B.21

GUARDIANS OF NEW ZEALAND SUPERANNUATION







## WHAT OUR INDEX COVERS

The boundary of our reporting in the Content Index below covers the Guardians of New Zealand Superannuation (Guardians), the New Zealand Superannuation Fund (NZ Super Fund) and the Elevate NZ Venture Fund (Elevate).

The Guardians, as the manager of the funds, invests money on behalf of the New Zealand Government to help pre-fund future universal superannuation payments. The Guardians is a Crown entity and its assets, along with the assets of both funds, are Crown assets. The Guardians is accountable to Parliament through the Minister of Finance. The funds and Guardians together comprise the 'organisation' referred to in the index for direct operations.

Our approach to sustainable investment is governed by our Statement of Investment Policies, Standards and Procedures (SIPSP). Our Sustainable Investment Framework sets out how we monitor the performance of, and engage with, investee companies and external managers on environmental, social and governance (ESG) issues.

The subsidiaries listed on pages 120, 142 and 200 of the Annual Report are excluded from the index. These are nominee companies only.

Information locations referred to in the index are the Annual Report, Climate Change Report and Stewardship Report, published in October 2025, and the NZ Super Fund website. Page numbers refer to page numbers in the Annual Report.

Our Annual Report, Climate Change Report and Stewardship Report are available on our website. Our website also contains our Statement of Intent and Statement of Performance Expectations for the NZ Super Fund and Elevate; information about how we invest; and other key organisational documents including our Communications and Engagement Policy.

## **GENERAL DISCLOSURES**

| DISCLOSURE                   | DESCRIPTION   | PAGE/S  | EXTERNAL ASSURANCE |
|------------------------------|---|---|--------------------|
| The organisation and its rep | orting practices  |   |                    |
| 2-1                          | Organisational details  | 6, 10, 53, 227  | No                 |
| 2-2                          | Entities included in the organisation's reporting                                 | 10, 28, 106, 112  | No                 |
| 2-3                          | Reporting period, frequency and contact point                                     | 6   | No                 |
| 2-4                          | Restatements of information   | N/A   | No                 |
| 2-5                          | External assurance  | 88-90, 132-134,<br>191-192, 217-218   | No                 |
| Activities and workers       |   |   |                    |
| 2-6                          | Activities, value chain and other business relationships                          | 10-11, 50-51, 53-63,<br>65-68, 75   | No                 |
| 2-7                          | Employees   | 33-34   | No                 |
| 2-8                          | Workers who are not employees   | We define workers who are not employees as contingent workers (contractors, consultants, freelancers, and temporary workers who are typically under a contract to complete a project or fill a role for a defined amount of time).  As at 30 June 2025, we had 32 contingent workers, with the majority (29) in the Technology business unit. |                    |
| Governance                   |   |   |                    |
| 2-9                          | Governance structure and composition  | 16-19, 80, 82-88  | No                 |
| 2-10                         | Nomination and selection of the highest governance body                           | 80, 83  | No                 |
| 2-11                         | Chair of the highest governance body  | 85  | No                 |
| 2-12                         | Role of the highest governance<br>body in overseeing the<br>management of impacts | 12-15, 20-21, 26-27,<br>70-74, 76-77, 81-82,<br>85-88, 92-96  | No                 |
| 2-13                         | Delegation of responsibility for managing impacts                                 | 76, 82, 92-93   | No                 |
| 2-14                         | Role of the highest governance body in sustainability reporting                   | 20-21, 28, 86, 88-89  | No                 |
| 2-15                         | Conflicts of interest   | 83, 86-87   | No                 |
| 2-16                         | Communication of critical concerns  | 83, 92-95   | No                 |

| DISCLOSURE                     | DESCRIPTION  | PAGE/S   | EXTERNAL ASSURANCE |
|--------------------------------|--|--|--------------------|
| 2-17                           | Collective knowledge of the highest governance body          | 16-17, 84  | No                 |
| 2-18                           | Evaluation of the performance of the highest governance body | 84-85  | No                 |
| 2-19                           | Remuneration policies  | 85, 98-103   | No                 |
| 2-20                           | Process to determine remuneration                            | 85, 98-103   | No                 |
| 2-21                           | Annual total compensation ratio                              | The 2025 annual total compensation ratio between the Guardians' highest paid employee to the median annual total compensation for all employees (excluding the highest paid individual) is 5.81:1.   | No                 |
|                                |  | The calculation is based on total remuneration paid for all employees for the period ended 30 June 2025 (including part-time workers' actual earnings). Total remuneration includes base salary, at risk discretionary incentive payments and KiwiSaver contributions. |                    |
| Strategy, policies and practic | es   |  |                    |
| 2-22                           | Statement on sustainable development strategy                | 12-15, 21, 70-71   | No                 |
| 2-23                           | Policy commitments   | 70-74, 76-77, 81, 97   | No                 |
| 2-24                           | Embedding policy commitments                                 | 32, 70-74, 76-78,<br>81, 92-93   | No                 |
| 2-25                           | Processes to remediate negative impacts                      | 70-78  | No                 |
| 2-26                           | Mechanisms for seeking advice and raising concerns           | 83   | No                 |
| 2-27                           | Compliance with laws and regulations                         | Over the past year<br>there have been no<br>significant instances of<br>non-compliance with laws<br>and regulations, and no<br>fines issued against the<br>Guardians or Funds.   | No                 |
| 2-28                           | Membership associations                                      | 70-73, 76-77, 91   | No                 |
| Stakeholder engagement         |  |  |                    |
| 2-29                           | Approach to stakeholder engagement                           | 28, 90-91  | No                 |
| 2-30                           | Collective bargaining agreements                             | 226  | No                 |
|                                |  |  |                    |

## **MATERIAL TOPICS**

| DISCLOSURE                       | DESCRIPTION   | PAGE/S   | EXTERNAL ASSURANCE   |  |
|----------------------------------|---|--|--|--|
| Disclosures on Material Topics   |   |  |  |  |
| 3-1                              | Process to determine material topics  | 28   | No   |  |
| 3-2                              | List of material topics   | 28   | 28   |  |
| <b>Economic Standards</b>        |   |  |  |  |
| GRI 201:<br>Economic Performance | Management of material topic 3-3  | 20-28, 40-78, 90,<br>96, 106-112                                       | No   |  |
|                                  | Strategy elements related to: businesses goals; the intended benefits for the recipient and the business; desired/expected outcomes from community investment activity; how community investment activities are identified and managed; and how performance and value for money is assessed |  |  |  |
|                                  | 201-1: Direct economic value generated; revenues; economic value distributed; operating costs, employee wages and benefits; payments to providers of capital; payments to government by country; and community investments  Economic value retained: 'direct economic value generated' less | 5, 35, 41-45, 47-68, 72,<br>98-103, 106-112                            | No   |  |
|                                  | 'economic value distributed'  201-2: Risks and opportunities posed by climate change that have the potential to generate substantive  | 76, 95 and 2025 Climate<br>Change Report (available<br>on our website) | Our Climate Change Report is subject to limited assurance. See the report for details. |  |
|                                  | changes in operations, revenue or expenditure   |  |  |  |
| GRI 205: Anti-Corruption         | Management of material topic 3-3  | 83, 95   | No   |  |
|                                  | 205-1: Total number and percentage of operations assessed for risks related to corruption and the significant risks identified  | 73-74, 95 and 2025<br>Stewardship Report<br>(available on our website) | No   |  |
| <b>Environmental Standards</b>   |   |  |  |  |
|                                  | Management of material topic 3-3  | 36-38  | No   |  |
| GRI 302: Energy                  | 302-1: Energy consumption within the organisation   | 36-38  | Yes  |  |
| GRI 305: Emissions               | 305-1: Estimated greenhouse<br>gas emissions (GHG) resulting<br>from business travel – Scope 1  | 36-38  | Yes  |  |
|                                  | 305-2: Estimated greenhouse<br>gas emissions (GHG) of<br>financing portfolio – Scope 2  | 36-38  | Yes  |  |

| DISCLOSURE                              | DESCRIPTION  | PAGE/S              | EXTERNAL ASSURANCE |
|---|--|---------------------|--------------------|
|   | 305-3: Estimated greenhouse<br>gas (GHG) emissions resulting<br>from business travel – Scope 3   | 36-38               | Yes                |
|   | 305-4: GHG emissions intensity   | 36-38               | Yes                |
|   | 305-5: Reduction of GHG emissions  | 36-38               | Yes                |
| GRI 306: Effluent and Waste             | 306-2: Total weight of waste by type and disposal method.  | 36-38               | Yes                |
| Social Standards                        |  |                     |                    |
| GRI 401: Employment                     | Management of material topic 3-3   | 30-34, 98-103, 226  | No                 |
|   | 401-1: New employee hires and employee turnover  | 30, 33-34           | No                 |
|   | 401-2: Benefits which<br>are standard for full-time<br>employees of the organisation<br>but are not provided<br>to temporary or part-time<br>employees, by significant<br>locations of operation | 98-99, 101-103, 226 | No                 |
|   | 401-3: Return to work and retention rates after parental leave, by gender  | 33, 226             | No                 |
| GRI 403: Occupational Health and Safety | Management of material topic 3-3   | 32, 83              | No                 |
|   | 403-1: Occupational health and safety management system  | 32                  | No                 |
|   | 403-2: Hazard identification, risk assessment, and incident investigation  | 32                  | No                 |
|   | 403-3: Occupational health services  | 32                  | No                 |
|   | 403-4: Worker participation, consultation, and communication on occupational health and safety   | 32                  | No                 |
|   | 403-5: Worker training on occupational health and safety   | 32                  | No                 |
|   | 403-6: Promotion of worker health  | 32                  | No                 |
|   | 403-7: Prevention and mitigation of occupational health and safety impacts directly linked by business relationships   | 32                  | No                 |
|   | 403-8: Workers covered by an occupational health and safety management system  | 32                  | No                 |
|   | 403-9: Work-related injuries   | 33                  | No                 |

## MATERIAL TOPICS (CONTINUED)

| DISCLOSURE                               | DESCRIPTION   | PAGE/S  | EXTERNAL ASSURANCE |
|--|---|---|--------------------|
| GRI 404: Training and Education          | Management of material topic 3-3  | 32  | No                 |
|  | 404 -1: Average hours<br>of training per year per<br>employee by gender, and by<br>employee category  | 32  | No                 |
| GRI 405: Diversity and Equal Opportunity | Management of material topic 3-3  | 32, 99 and our Diversity,<br>Equity and Inclusion<br>Strategy 2022-2027,<br>available on our website. | No                 |
|  | 405-1: Composition of<br>governance bodies and<br>breakdown of employees per<br>employee category according<br>to gender, age group, minority<br>group membership, and other<br>indicators of diversity | 33-34, 87   | No                 |