

WHAI RAWA FUND LIMITED

STATEMENT OF INVESTMENT POLICY AND OBJECTIVES
WHĀIKA ME TE KAUPAPAREHERE TAUĀKĪ HAUMITAKA



SECTION ONE

INTRODUCTION

PURPOSE

The purpose of this Statement of Investment Policy and Objectives (“SIPO”) is to document the decisions of Whai Rawa Fund Limited (“the Manager”) in respect of the investment of funds within the Whai Rawa Unit Trust (“the Trust”).

The SIPO provides all parties involved in the investment management of the Trust with a working document that identifies the investment philosophy, objectives, strategy, implementation, performance measurement criteria, risk management and review procedures to be observed.

It also specifies that the investment management process is to be implemented in accordance with the requirements of the Financial Markets Conduct Act 2013 and the Financial Markets Conduct Regulations 2014 (together the FMCA), Trusts Act 2019 and the Trust’s rules as set out in the Whai Rawa Trust Deed (as amended from time to time) (“Trust Deed”).

The SIPO identifies the responsibilities of the parties involved in the management of the Trust’s investments; namely the Manager in its capacity as manager of the Trust and any appointed investment manager or underlying fund manager.

This SIPO is effective from 9 December 2024 and replaces all previous SIPOs.

THE TRUST

The Trust was established by Te Rūnanga o Ngāi Tahu (“TRoNT”) in 2006 to build the wealth of Ngāi Tahu Whānui members by encouraging savings and facilitating receipt of distributions from TRoNT.

The Trust is a registered managed investment scheme under the FMCA and as at the date of this SIPO is governed by a Trust Deed dated 1 October 2019.

The Manager of the Trust is Whai Rawa Fund Limited.

The Supervisor of the Trust is Trustees Executors Limited.

On 17 February 2020, the Manager made three socially responsible investment options available to the Trust’s members and invested the funds of the Trust accordingly in the Mercer Investment Trusts New Zealand Socially Responsible Conservative Portfolio, the Mercer Investment Trusts New Zealand Socially Responsible Balanced Portfolio, and the Mercer Investment Trusts New Zealand Socially Responsible Growth Portfolio (together “Portfolios”), each managed by Mercer (N.Z.) Limited (“Mercer”) as the underlying fund manager for the Trust.

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SECTION TWO

RESPONSIBILITIES OF THE PARTIES

MANAGER**The Manager:**

1. Determines the objectives for the investment of the Trust's assets having regard to the nature of those assets, tax implications, and the appropriate level or risk; and
2. determines the appropriate number of external investment managers and / or underlying fund managers (together with applicable underlying funds) of the Trust, and select, review and make changes to such manager(s) and funds as appropriate. The selection of such investment manager(s) and underlying fund managers is based on criteria determined by the Manager and includes a review of:
 - a) the investment processes carried out by the investment manager and / or underlying fund manager;
 - b) the quality of the investment manager's and / or underlying fund manager's personnel and the range of skills offered by the investment manager and / or underlying fund manager(s);
 - c) the ability of the investment manager and / or underlying fund manager to comply with the Manager's reporting requirements;
 - d) the performance of the investment manager and / or underlying fund manager(s); and
 - e) the investment manager's and / or underlying fund manager's ability to meet Portfolio Investment Entity Vehicle flow through requirements and the integrity of the investment manager's and / or underlying fund manager's systems.

As at the date of this SIPO, the Manager has determined to invest the Trust's assets in the Portfolios (which are 'underlying funds'). The Portfolios are managed by Mercer (which is the 'underlying fund manager').
3. determines and periodically reviews the investment strategies and risk management constraints for the investment of the Trust's assets. This may include long term sector allocation mix, trading ranges and method of implementation. For example, the Manager may select a unit trust or pooled investment arrangement (whether offered by a selected investment manager or an alternative underlying fund manager) which, in part or as a whole, is appropriate for the Manager to invest in;
4. establishes investment performance criteria for the selected investment manager(s) and/or underlying funds in which the Trust invests;
5. establishes and maintains appropriate contractual arrangements with the investment manager and underlying fund manager(s) and any other parties involved in the investment of the Trust's assets;
6. regularly monitors the investment results to assess the progress being made towards the Trust's long-term objectives;

7. monitors appointed investment manager(s) and underlying funds to determine whether they have:
 - a) performed satisfactorily relative to their objectives;
 - b) adhered to the investment guidelines and constraints, and invested in a manner consistent with the stated philosophy and any pooled fund guidelines; and
 - c) maintained appropriate safe custody of assets and supporting processes, systems and controls.
8. periodically reviews, at least annually, the fees charged to members in the Trust (including fees charged at the underlying fund level) ensuring that they receive value for money, including taking into account fees charged in relation to similar investment options;
9. advises the investment manager and / or underlying fund manager of any material changes to the operation of the Trust;
10. reviews this SIPO at least every year (in consultation with the Supervisor), or more frequently if appropriate due to material changes in investment conditions or circumstances including investment strategy, policies or the parties included in this SIPO; and
11. ensures compliance by the Trust with this SIPO and the requirements of the FMCA.

The Trust Deed permits the establishment of more than one investment option/fund, with the objective of enabling the Manager to provide investment choice to Members.

As at the date of this SIPO, the Manager offers conservative, balanced and growth investment options named the Tōtara-Conservative Fund, Matai-Balanced Fund, and Rātā-Growth Fund (each a "Fund" and together the "Funds").

The Manager may appoint an independent investment adviser to provide advice from time to time on asset allocation and other investment matters.

INVESTMENT AND UNDERLYING FUND MANAGERS

For each Fund, the selected investment manager and / or underlying fund manager:

1. invests the assets of the Trust provided to it in accordance with this SIPO and the governing documents of any underlying investment funds invested in pursuant to this SIPO;
2. advises the Manager in writing before any changes in the investment objectives, guidelines or constraints of any unit trust or pooled investment fund provided by the investment manager and / or underlying fund manager in which the Manager invests;
3. provides a written copy of its policy on its use of derivatives and advise the Manager in writing of any change to this policy before a change being implemented;
4. each month provides the Manager with a written report summarising the month and the year-to-date returns, and the asset allocation between investment sectors if appropriate;
5. on request by the Manager, provides the Manager with any other information that the Manager may reasonably require to meet reporting obligations and maintenance of disclosures under the FMCA (for example in respect of SIPO Limit Breaks, Related Party Transactions, Pricing Error or Non-Compliance Reports, the Product Disclosure Statement (PDS), Fund Updates, Annual Reports, and the information required to be disclosed on the Disclose Register);
6. within an agreed period following the conclusion of each quarter in respect of the Trust's investments for which the relevant manager is responsible, provides the Manager with a written report setting out:
 - a) the time weighted returns for the Trust's investments, for the quarter, year to date and for rolling three-year periods, before tax and investment expenses;
 - b) an attribution analysis of the returns achieved, including performance against benchmarks;
 - c) the allocation of the Trust's assets between investment sectors at the end of the quarter;
 - d) a summary of assets held, accounting and taxation information over the period including balance sheets, financial transactions showing cost, book and market values. Where pooled funds are held, a summary of the major holdings and any changes during the period;
 - e) a description of the fees and expenses incurred during the reporting period;
 - f) a statement of compliance with any constraints in the mandate or pooled product guidelines, and with its stated operational constraints, processes and policies; and
 - g) any other information that the Manager may reasonably require, including information required by the Manager to meet reporting obligations and maintenance of disclosures under the FMCA (for example in respect of SIPO limit breaks, the PDS, any Fund Update documents and Disclose Register).
7. participates with the Manager in reviewing the SIPO from time to time.

SECTION THREE

INVESTMENT PHILOSOPHY AND OBJECTIVES

INVESTMENT PHILOSOPHY (“BELIEFS”)

Underpinning the Trust’s general objectives and specific investment strategy are the following set of investment “beliefs”.

Any investment should be consistent with the Responsible Investment Policy outlined below. The Manager has elected to offer investment options that align with the Manager’s Responsible Investment Policy outlined below. In determining its policy, the Manager has taken TRoNT’s Investment Charter into consideration.

The key determinant of risk and return and, as a result, whether or not investment objectives are achieved, is the allocation between asset classes. Investment decisions on specific securities are expected to have a lesser impact.

Risk and return are generally (although not always) related with investors expecting to be compensated for accepting risk, or increased volatility of returns, by higher returns over an appropriate time frame.

The Manager believes that investment risk can be reduced by appropriate diversification. Where appropriate, the assets of each Fund within the Trust should be diversified across investment products, asset classes, countries, industries, durations, and securities. Investments for each Fund will be managed to ensure there is sufficient liquidity to meet expected cash flow requirements with appropriate liquidity management tools available also to respond to unexpected circumstances.

Investment managers and underlying fund managers are expected to ensure that their portfolios are adequately diversified such that the failure of any one investment or combination of investments is unlikely to permanently impair or put at risk the viability of the funds being managed.

External investment specialists are currently able to offer greater skills, resources and flexibility in relation to investment solution design and implementation.

RESPONSIBLE INVESTMENT POLICY

The Manager of the Trust has adopted the following Responsible Investment Policy.

The key components of the policy are:

- 1. Sustainable Investment.
- 2. Ethical Exclusions.
- 3. Corporate Governance and Proxy Voting.

The Manager believes a sustainable investment approach is more likely to create and preserve long-term investment capital.

As an investor in New Zealand and international markets, the Manager believes that Environmental, Social and Governance (ESG) factors can have a material impact on long term risk and return outcomes. Further, the Manager believes that principles of active ownership and investment stewardship are of value in the investment process.

The Manager believes that the principles above can be applied across asset classes. In determining its policy, the Manager has taken TRoNT’s Investment Charter into consideration.

The Manager has elected to invest in the Mercer Investment Trusts New Zealand Socially Responsible Conservative, Balanced and Growth Portfolios, where ESG factors are incorporated in decision making and ownership practices. The Manager will take into consideration the extent to which those Portfolios are consistent with the above and the overarching principles of TRoNT’s Investment Charter. Those principles involve considering the extent to which investments are consistent with Ngāi Tahu values and do not undermine:

- » environmental stewardship;
- » consumer protection;
- » human rights; or
- » racial or gender diversity.

The Portfolios chosen by the Manager may exclude investments in companies that the underlying fund manager (Mercer) views as doing substantial and irreparable harm to society or the environment.

As at the date of this SIPO, the following exclusions are currently applied to the direct holdings in all Portfolios.

- » Controversial Weapons companies, means companies that:
 - Manufacture whole weapons systems, or delivery platforms, or key components that were developed or are significantly modified for use in cluster munitions, anti-personnel landmines, biological or chemical weapons, or nuclear weapons (regardless of revenue).
 - Are involved in the production and retailing of automatic or semi- automatic civilian firearms and ammunition (regardless of revenue).
- » Tobacco Companies, companies that:
 - Are involved in the manufacture and/or production of tobacco, manufacture of nicotine alternatives or tobacco-based products (regardless of revenue), including subsidiaries and joint ventures. Nicotine alternatives and tobacco-based products include nicotine vaping products (such as ‘vaping’ devices and e-cigarettes).
 - Derive 50% or more of their gross revenue from tobacco-related business activities such as packaging, distribution and retailing.
- » Russian Assets, defined as:
 - Sanctioned Russian entities and related entities of sanctioned entities;
 - Equity - for publicly held companies with Russia as the country of incorporation and where the security has a primary listing in Russia (including ADRs/GDRs), plus subsidiary mapping;
 - Fixed income - issuers captured in the equity screening (as above) by country of incorporation, plus Russian sovereign bonds and bonds issued by Russian government-related entities (Rouble or foreign currency denominated).
 - Cash holdings in Russian currency;
 - Russian FX exposure;
 - Private markets assets domiciled in Russia;
 - All secondary issues of excluded securities; and
 - Derivatives having a Russian asset as primary exposure.

The Exclusions Criteria and Additional Exclusions listed below are current as at the date of this document and changes may occur from time to time.

Additional Exclusions are applied in addition to the above Exclusions Criteria, to direct holdings in Equities and Global Credit asset classes within the Portfolios, unless other factors beyond the underlying fund manager’s control mean they are not possible to apply. The Additional Exclusions apply to investments in alcohol, gambling, adult entertainment and fossil fuels within certain revenue thresholds. Other Fixed Income, Overseas Sovereign Bonds and New Zealand Sovereign Bonds asset classes do not have the below Additional Exclusions. Additional Exclusions are defined as:

- » Companies that are involved in the following as defined by
- » Global Industry Classification Standard (GICS) sub-industry:
 - Oil & Gas Drilling
 - Oil & Gas Equipment & Services
 - Integrated Oil & Gas
 - Oil & Gas Exploration & Production
 - Coal & Consumable Fuels



- » Companies that own proved or probable reserves in coal, oil, or gas; and derive in excess of 15% of their revenue from exploration and extraction of coal, oil or gas. Where referred to above, 'coal, oil, or gas' includes these fuels where derived from unconventional sources such as tar sands or shale. However, metallurgical coal is not included in the term "coal".*
- » Companies with more than 10% of revenue from adult entertainment-related business activity (adult entertainment-related activities mean production, distribution and not accessible to minors as defined by third-party data provider).
- » Companies with more than 10% of revenue from alcohol-related business activities (alcohol-related activities mean production, distribution and services to the production of alcoholic beverages alcohol as defined by third-party data provider).
- » Companies with more than 10% of revenue from gambling-related business activities (gambling-related activities mean production, services and distribution of gambling products as defined by third-party data provider).
- » Companies involved in the development and production of depleted uranium ammunition/armour.

Revenue is based on the latest reported company financial year end.

Net revenue is used where gross revenue is unavailable.

The Manager has approved these additional exclusions as being consistent with its responsible investment philosophy, and they are incorporated within this SIPO accordingly.

INVESTMENT OBJECTIVES

This table shows a brief description and the investment objective for each of the Funds available within the Trust:

FUND NAME	DESCRIPTION OF THE FUND AND IT'S INVESTMENT OBJECTIVES ¹
TŌTARA-CONSERVATIVE FUND	This Fund provides an investment exposure to mostly cash and fixed interest assets, with only some investment in shares and real assets. It seeks to provide growth of your investment through consistent returns using a diversified portfolio that has a bias towards defensive assets.
MATAĪ-BALANCED FUND	This Fund provides an investment exposure to a wide range of assets and seeks to provide long-term capital growth for your investment by using a diversified portfolio with a slight bias towards growth assets.
RĀTĀ-GROWTH FUND	This Fund provides an investment exposure to mainly shares and property related assets. It seeks to provide higher long-term capital growth for your investment from its stronger exposure to growth assets and lower investment in defensive assets.




PERFORMANCE OBJECTIVES

The Manager notes that the investment objectives should recognise the risks of inflation eroding the value of future returns. The return objectives have been set (as shown in the table below) seeking to achieve a certain level of real return (both before and after tax of 28%, being the highest Prescribed Investor Rate) over a given rolling period. The objectives shall be reviewed from time to time to ensure reasonableness.

The table below outlines the performance objectives that have been set for each Fund. Outperformance will also be sought relative to the return of each Fund's benchmark

portfolios (the structure of which are outlined in Section Six) over given investment timeframes.

The benchmark returns of the Funds and the underlying Portfolios are calculated by adding the return of each asset class (given by the relevant indices shown in Section Six) weighted according to the specific asset class weights shown in Section Four. To do this, each index return is sought for the relevant period, then multiplied by the benchmark weight of that asset class to give the overall benchmark return.

	 TŌTARA-CONSERVATIVE FUND INVESTMENT OBJECTIVES	 MATAĪ-BALANCED FUND INVESTMENT OBJECTIVES	 RĀTĀ-GROWTH FUND INVESTMENT OBJECTIVES
RATE OF RETURN ABOVE CPI (AFTER FEES AND AFTER TAX)	1.0%	2.5%	3.0%
RATE OF RETURN ABOVE CPI (AFTER FEES AND BEFORE TAX)	2.0%	3.50%	4.0%
INVESTMENT TIMEFRAMES	3 years	8 years	10 years
RATE OF RETURN ABOVE BENCHMARK (BEFORE FEES AND TAX) OVER 3 YEARS	0.50%	1.0%	1.0%

* ISS ESG definitions as follows: 'Metallurgical/coking coal' designates the various grades of coal suitable for carbonisation to make coke for steel manufacture. Metallurgical coal has a particularly high heating value and a low ash content. 'Thermal/steam coal' designates coal used by power plants and industrial steam boilers to produce electricity or process steam. It generally has a lower heat content and a higher share of volatile matter than metallurgical coal.'

¹ Each Fund currently invests in one of the socially responsible fund portfolios within Mercer Investment Trusts New Zealand in order to gain exposure to the desired the mix of investments.




SECTION FOUR

INVESTMENT STRATEGY AND IMPLEMENTATION




The Manager determines the investment strategy for the Trust and each Fund. The investment strategy for the Trust is to invest so as to gain exposure to an appropriate mix of defensive and growth assets with a benchmark split between defensive and growth assets for each of the Funds as set out below.

The actual allocation may vary from a strategic asset allocation for a Fund from time to time but must stay within the benchmark ranges specified as a percentage of the total assets of each Fund within the Trust (see below). Currently the Manager implements the strategy by investing the Trust's assets in the Portfolios.

The strategic asset allocations for each Fund, as at the date of this SIPO, are specified in the table below.

ASSET CLASS/ SECTOR (%)	 TŌTARA- CONSERVATIVE FUND	 MATAĪ- BALANCED FUND	 RĀTĀ- GROWTH FUND
Trans-Tasman Shares	5.0	13.0	19.0
Overseas Shares	12.0	39.0	52.0
Total Global Shares	12.0	39.0	52.0
Total Shares (excluding Real Assets)	17.0	52.0	71.0
Unlisted Property	1.0	3.0	3.0
Listed Infrastructure Shares	1.0	2.0	3.0
Unlisted Infrastructure	1.0	3.0	3.0
Total Real Assets investments	3.0	8.0	9.0
NZ Sovereign Bonds	25.0	10.0	5.0
Overseas Sovereign Bonds	18.0	11.0	5.5
Global Credit	15.0	10.0	4.5
Other Fixed Interest	2.0	5.0	4.0
Private Debt	0.0	0.0	0.0
Total Fixed Interest	60.0	36.0	19.0
Total Cash	20.0	4.0	1.0
Total	100.0	100.0	100.0
Growth Investments	20	60	80
Defensive Investments	80	40	20

The benchmark ranges for each Fund, as at the date of this SIPO, are outlined in the table below.

ASSET CLASS / SECTOR (%)	 TŌTARA-CONSERVATIVE FUND	 MATAĪ-BALANCED FUND	 RĀTĀ-GROWTH FUND
Trans-Tasman Shares	0 - 10	3 - 23	9 - 29
Global Shares	6.5 - 16.5	29 - 49	42 - 62
Real Assets investments	0 - 10	2 - 20	4 - 26
Alternative investments	-	0 - 10	0 - 10
Fixed Interest	45 - 75	21 - 51	9 - 29
Private Debt	0 - 10	0 - 10	0 - 10
Cash	10 - 40	0 - 20	0 - 15
Growth Investments	5 - 35	40 - 70	60 - 90
Defensive Investments	65 - 95	30 - 60	10 - 40

The Manager recognises that it has no direct role in the management of the assets, including the division of investments in the general investment categories of fixed interest, shares and real assets across international and local investments or other more specific “sub class” investment categories.

INVESTMENT PROCESS AND REVIEW FOR THE UNDERLYING FUNDS (THE PORTFOLIOS)

Mercer, as the underlying fund manager, seeks to achieve the expected return target on a risk-adjusted basis by investing across a wide range of assets, diversified across asset classes, regions, sectors and markets.

It expects to undertake strategic asset allocation reviews of its Portfolios at least every three years, with interim health-checks in-between the reviews. The process takes into account a number of risks, including the probability of achieving the investment objective, expected volatility, expected frequency of negative returns, expected outcomes from different scenarios, liquidity risk and risk-factor analysis.

Mercer adopts a multi-manager approach, in many cases selecting multiple managers for each asset class. Underlying managers are selected based on comprehensive research, are monitored regularly and typically reviewed annually.

DYNAMIC ASSET ALLOCATION

Mercer, as the underlying fund manager, undertakes a dynamic asset allocation process whereby it tilts exposure to asset classes with the primary goals of reducing risk, preserving capital and enhancing returns of the overall Portfolios. The process is designed to reduce exposure to those assets considered over-valued and increase exposure to those assets deemed to be under-valued taking a medium-term view (1-3 years).

REBALANCING

Mercer, as the underlying fund manager, will continuously review the breakdown of each Portfolio’s assets at least monthly and undertake any required rebalancing to maintain the asset class, sector and growth / defensive asset allocations within benchmark ranges for each Portfolio and Fund, particularly in the event that the exposure to growth assets has drifted outside of the permitted applicable bands for the Portfolios (which mirror the permitted applicable bands for the Funds, as specified above). Unless extraordinary circumstances exist, the underlying fund manager is expected to immediately, upon discovery, report such benchmark range breach to the Manager and undertake any rebalancing within 5 working days of recognition.

CURRENCY HEDGING

The Manager considers currency hedging an essential part of any long-term investment strategy.

Mercer, as the underlying fund manager of the Trust, also believes that an active approach to currency hedging is appropriate, and therefore, manages the level of currency exposure in the Portfolios as part of its dynamic asset allocation process. This implies that the Portfolios will not maintain the same level of currency hedging at all times.

Currency hedging is essentially protection against changes in currency exchange rates. Overseas assets that are not hedged will have exposure to currency exchange rate movements. This results in a benefit when the value of the New Zealand dollar decreases, and a disadvantage in value when the value of the New Zealand dollar goes up.

Mercer sets a benchmark level of currency hedging for each overseas asset class, as detailed in the table below. The dynamic asset allocation process establishes the target level of currency exposure. This is then monitored as part of Mercer’s daily processes.

Currency hedging may be carried out either by Mercer at the asset class level using a currency manager or by the Portfolios’ underlying fund managers. The table below details the current New Zealand dollar strategic hedging levels for the Funds.

ASSET CLASS/ SECTOR	BENCHMARK	ACTIVE MANAGEMENT RANGE (TARGET)
Global Shares ¹	50	0 - 100
Real Assets investments ²	100	-
Global Fixed Interest ²	100	-

¹ hedged to NZ\$ such that total global shares are 50% hedged on a net of tax basis for a 28% PIR taxpayer. The level of currency hedging for global shares is managed between 0% and 100% (on a net of tax basis) and may change over time depending on Mercer’s view of the relative strength (or weakness) of the New Zealand dollar.

² 100% hedged to NZ\$ on a net of tax basis for a 28% PIR taxpayer.

SECTION FIVE

RISK MANAGEMENT

The principal risk management policies and constraints which will apply in respect of the investment strategy are:

1. **Legal:** The investment of the Trust's assets held by each Fund will comply with all legal requirements having regard to the terms of the Trust's Trust Deed and any other legal requirements.
2. **Diversification:** An appropriate level of diversification across asset classes, sectors, securities and countries must be maintained. Each Fund should not hold more than 10% of its assets in any one underlying security (other than units in an underlying fund). Government guaranteed securities are not subject to these maximums.
3. **Asset Rebalancing:** Investment managers and underlying fund managers are to maintain appropriate periodic investment rebalancing processes to ensure asset exposure ranges and security guidelines and limits as specified in mandates or pooled product guidelines are maintained.
4. **Borrowing:** No constraints are placed on the Manager's, any investment manager's or any underlying fund manager's ability to raise cash for the management of short-term cash flow transactions but normally the Trust should not borrow and any borrowing on the security of Trust assets must be disclosed.
5. **Liquidity:** The Trust primarily requires liquidity to meet payment obligations to members as they arise. Given the general "locked in" nature of member funds and the limited range of benefit types available to members there is not a requirement for a high level of immediate liquidity to be maintained in the investment structure. However, material exposure to listed investment markets provides a sound core of liquidity to the Trust.
6. **Taxation:** As the Trust is a Portfolio Investment Entity (PIE), investment returns will be attributed to members at the PIR they provide, or the default tax rate of 28% as applicable.
7. **Asset lending:** The assets of the Trust are not to be used for the purposes of lending nor for backing the credit position of other parties.
8. **Derivatives:** The use of futures, options and other synthetic investments (derivatives) by an investment manager or underlying fund manager or their delegates is permitted only as a hedge to manage exposure to foreign currency or other investment risks or to reduce transaction costs and / or improve liquidity by taking a position which would otherwise have been taken by buying or selling the actual stock. In particular, derivatives will not be used in a speculative manner that would gear the Funds.
9. **Currency Hedging:** Overseas assets with foreign currency exposure should generally be fully hedged back to NZ dollars with the exception of overseas shares, which are to be 50% hedged on a net of tax basis. The level of currency hedging within overseas shares is managed and may change over time depending on an investment manager's or underlying fund manager's view of the relative strength (or weakness) of the New Zealand dollar.
10. **Responsible Investing:** The Manager will take into consideration the extent to which the underlying investments of the Trust are consistent with the Responsible Investment Policy and Ngāi Tahu values. Where an individual investment made by a Portfolio in which the Trust invests is identified as being inconsistent with Ngāi Tahu values or TRoNT's Investment Charter, that discrepancy is assessed to determine whether it materially undermines the desired overall consistency with Ngāi Tahu values, and the Manager will engage with the underlying fund manager to discuss the discrepancy. If concerns over the extent to which the investment in question undermines the Manager's Responsible Investment Policy cannot be addressed then the Fund in question is likely to be regarded as not performing satisfactorily against the agreed responsible investing criteria and the Manager will explore options for an alternative Portfolio for the Fund to invest in. If the investment of concern is not regarded as materially undermining overall consistency with Ngāi Tahu values, a watching brief will be maintained.
11. Where the Manager determines that an appropriate investment vehicle is a unit trust or pooled investment arrangement it is recognised by the Manager that the strict enforcement of the investment guidelines, constraints and requirements may not be possible in the overall best interests of the Trust. Where such an investment is made, the Manager may continually reassess the overall suitability of such an investment vehicle in light of these guidelines.

SECTION SIX

INVESTMENT PERFORMANCE MONITORING

OBJECTIVES

The principal objectives of performance monitoring are to:

1. Assess the extent to which each Fund's long-term objectives are being achieved;
2. Compare the performance of the selected investment vehicles against the performance of other relevant assets, market indices and comparable products or peer group;
3. Assess the performance of appointed investment manager(s) and underlying fund manager(s) where active decisions have been taken around the strategic asset allocation or active management is undertaken within asset classes (as opposed to passive);
4. Confirm that all investment constraints have been complied with; and
5. Ascertain the existence of any particular weakness in the product(s) utilised.

SATISFACTORY PERFORMANCE

The Manager will review the Trust's performance against its objectives at least quarterly. Among other things, the investment performance may be considered unsatisfactory:

1. If it fails to match the investment performance objective set out in Section Three for each Fund;
2. If, for each Fund, overall investment performance is below the return that would have been earned by investing the relevant benchmark asset mix on a passive basis;
3. If, for any Fund, peer group or appropriate product comparisons show returns to have been below average; or
4. If any Fund did not perform against the responsible investing criteria agreed from time to time between the Manager and any underlying fund manager.

BENCHMARK INDICES

The Manager will adopt the various investment sector benchmark indices used from time to time by the Portfolios for investment performance measurement and reporting and for its own performance review purposes.

ASSET CLASS	BENCHMARK INDICES
Cash	S&P/NZX Bank Bills 90-Day Index
NZ Fixed Interest	S&P/NZX NZ Government Bond Index
International Fixed Interest	JP Morgan Global Government Bond Index (100% hedged to NZD on an after-tax basis)
Global Credit	Bloomberg Barclays Global Aggregate Corporate Index (100% hedged to NZD on an after-tax basis)
Other Fixed Interest	S&P/NZX Bank Bills 90-Day Index
Australasian Equities	S&P/ NZX 50 Index with Imputation Credits
International Equities	<p>Unhedged: MSCI World Index with net dividends reinvested in NZD;</p> <p>Hedged: MSCI World Index with net dividends reinvested (100% hedged to NZD on an after-tax basis)</p>
Listed Property	FTSE EPRA/NAREIT Developed Index (with net dividends reinvested) (100% hedged to NZD on an after-tax basis)
Unlisted Property	Composite: 70% MSCI/Mercer Australia Core Wholesale Monthly Property Fund Index - NAV Weighted Post-Fee Total Return (All Funds) 1M Lag ³ (100% hedged to NZD on an after-tax basis), & 30% MSCI/Property Council of New Zealand Annual Property Index published quarterly
Other	<p>Listed Infrastructure: FTSE Developed Core Infrastructure 50/50 Index with net dividends reinvested (100% hedged to NZD on an after-tax basis)</p> <p>Unlisted Infrastructure: MSCI Australia Quarterly Private Infrastructure Fund Index (unfrozen) - 50th percentile Post-Fee Total Return (All Funds) 3M Lag³ (100% hedged to NZD on an after-tax basis)</p> <p>Alternative Assets: HFRI FOF - Market Defensive Index (100% hedged to NZD on an after-tax basis)</p>

³ Unlisted Property and Unlisted Infrastructure benchmarks are peer group indices, all other benchmarks are market indices.

SECTION SEVEN

LIMIT BREAKS

The Financial Markets Conduct Act 2013 requires reporting of material breaches of the SIPO (limit breaks) to the Financial Markets Authority.

MATERIALITY

Whether or not a breach of this SIPO is material is determined at the discretion of the Manager. In considering whether or not a breach is material, the Manager will give consideration to:

1. The nature of the breach;
2. The cause of the breach, including whether or not the breach is the result of sharp short-term market movements; and
3. The size of the breach.

A breach of a range resulting from market movements, which is corrected within 5 business days, will not ordinarily be deemed material for limit break reporting purposes.

MONITORING PROCESS

The Manager will monitor the investments of each Fund for compliance on a monthly basis, including monthly, quarterly or other reporting from any investment manager and underlying fund managers to certify compliance with the investment agreement (or, in the case of an underlying fund manager, the governing and offer documents of the relevant investment product).

RESOLUTION AND REPORTING

Where the Manager becomes aware of a limit breach, the investment or underlying fund manager will be instructed to remedy the breach immediately.

Where the Manager determines that a material limit breach has occurred, and that breach is not resolved within 5 business days, the Manager will immediately report the limit break to the Supervisor; otherwise the Manager will report limit breaks to the Supervisor each quarter.

SECTION EIGHT

SIPO REVIEWS

This revised SIPO was put in place on 9 December 2024.

The date of the next standard SIPO review is 26 January 2026 or sooner if conditions or changes to the Trust warrant.

SIPO reviews are approved by the Board of the Manager. The Manager may use professional investment advice if considered appropriate. The underlying fund manager’s views will be sought on any SIPO review. We may make changes to the SIPO from time to time, with the agreement of the Supervisor and without notifying you.



THE MOST RECENT VERSION OF THE SIPO IS AVAILABLE ON THE DISCLOSE REGISTER >
www.disclose-register.companiesoffice.govt.nz



TE PĀTAKA

*The storehouse raised upon
posts, pantry, larder.*

*The Whai Rawa account is symbolic of and
can represent your financial storehouse.*



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Whai Rawa Fund Limited is the issuer of the Whai Rawa Unit Trust. A copy of the Product Disclosure Statement is available at www.whairawa.com/pds

Whai Rawa NGĀI TAHU



Te Rūnanga o NGĀI TAHU