

Fisher Funds KiwiSaver Scheme

Statement of Investment Policy and Objectives

Issued by Fisher Funds Management Limited | 30 June 2023



1. Introduction

1.1.1 Name of Managed Investment Scheme: Fisher Funds KiwiSaver Scheme

1.1.2 Name of Fund: Conservative Fund

1.1.3 Description of the Fund: The Fisher Funds KiwiSaver Conservative Fund aims to provide stable returns over the long term by investing mainly in income assets with a modest allocation to growth assets.

1.1.4 Supervisor: The supervisor of the fund is Trustees Executors Limited (the Supervisor).

1.1.5 Purpose of this SIPO: This document sets out the objectives and policies governing investment decisions in relation to the fund. The current SIPO is available on the Fisher Funds website, at <https://fisherfunds.co.nz/> and on the Disclose Register, at <https://disclose-register.companiesoffice.govt.nz/>.

2. Risk and Return

2.1.1 Investor Suitability: This fund is suitable for a short term or naturally cautious investor, who is nearing retirement or looking to make a withdrawal in the short term and who values lower volatility of returns over achieving potential higher returns.

2.1.2 Risk Description: This is a low to medium risk fund.

2.1.3 Investment Type: This is a conservative diversified fund.

2.1.4 Return Expectations: On a scale of 1 to 5, where returns from Cash assets are 1 and returns from Share assets are 5, we expect the fund to be 2.

2.1.5 Primary Investment Objective: The aim of the fund is to provide moderate protection for savings, while also providing a moderate level of return over the medium term.

2.1.6 Secondary Investment Objective: The aim is to meet or exceed the return of the investment benchmark before fees and tax over the long term.

2.1.7 Investor Liquidity Requirements: KiwiSaver members are able to make withdrawals within five business days when they reach retirement age or certain other criteria are met. All KiwiSaver members are able to switch to another provider within ten business days. However, it is highly unlikely that all members will be withdrawing or switching at the same time and therefore as a whole, investor liquidity requirements are deemed to be low and therefore liquidity is not given significant consideration when making investment decisions.

3. Investments

3.1 General

3.1.1 Typical Investments: Predominantly cash and fixed interest securities. Also shares in New Zealand, Australia and other international markets. The Manager may also hold derivatives, property, and alternative assets.

3.1.2 Investment Philosophy: We believe superior investment returns can be achieved over time through adopting an active management approach. The principles that underpin this are:

- a) We are long term investors, seeking to build deep knowledge of our investments, which we think give us the best chance of picking winners and avoiding losers.
- b) We focus on the factors that we can predict and understand, like the quality and competitive advantage of a particular company, rather than unpredictable factors such as exchange rates.
- c) We understand the difference between price and value, and we know the market will get it wrong from time to time. We rely on our own assessment of value, rather than the market's price.
- d) By diversifying our investment portfolios across industries, sectors, and geographies we seek to guard against any one investment having an undue influence on overall returns.
- e) We are responsible investors who embed our environmental, social, and governance principles inside our research process.

3.1.3 Aspects of the Fund that will be managed by External Managers: It is possible that some of the fund's assets will be managed by external investment managers. When selecting an external manager we conduct due diligence including an assessment of their investment performance, financial stability, experience, reputation and history, quality and reliability of services provided to other customers, fees and costs, and the transparency of each, number and competence of staff and managers, organisational 'fit' with Fisher Funds and its strategic direction.

3.1.4 Investing in Other Funds: The fund may invest in units or sub-units or other shares or interest in any fund or managed investment scheme where the underlying assets are primarily investments that are authorised investments in other sections of this SIPO.

3.1.5 Minimum, Benchmark and Maximum Asset Class weightings:

Asset Class	Benchmark Asset Allocation (Long Term Target)	Minimum	Maximum
Cash	14.5%	0.0%	100.0%
New Zealand Fixed Interest	26.0%	10.0%	100.0%
International Fixed Interest	32.0%	0.0%	60.0%
Total Income Assets	72.5%	50.0%	100.0%
Direct Property	5.0%	0.0%	10.0%
Australasian Shares	5.5%	0.0%	16.0%
International Shares	12.0%	0.0%	20.0%
Other*	5.0%	0.0%	10.0%
Total Growth Assets	27.5%	0.0%	50.0%
Alternatives	0.0%	0.0%	10.0%

*Other refers to a portfolio of listed property and listed infrastructure assets.

3.1.6 Classification of Alternatives: The characteristics of any Alternative asset will determine whether it is classified as an Income or Growth Asset.

3.1.7 Need for Liquidity in Assets: Given the stable nature of KiwiSaver investors, it is expected that liquidity needs of the fund can be met through the market liquidity of its securities and no special provisions for additional liquidity are needed.

3.1.8 Prohibited Investments: The fund is prohibited from investing directly or indirectly in securities issued by companies on the Fisher Funds Prohibited Companies List. This list is informed by the Fisher Funds Responsible Investment Policy available at www.fisherfunds.co.nz.

3.1.9 Responsible Investing: Where company analysis is carried out, the Manager will have regard for the environmental, social and governance issues of companies that the fund invests in.

3.1.10 Use of Derivatives: The fund is permitted to use derivatives that reference investments that are authorised in this SIPO. Where derivatives are used the resulting portfolio exposures to investments plus the economic exposure derived by derivative positions must comply with all appropriate guidelines in this SIPO.

3.1.11 Asset Class Rebalancing: The weightings in each asset class will be reviewed, at least, weekly and rebalanced if appropriate. The Manager will have regard for transaction costs when considering whether a rebalancing is appropriate.

3.1.12 Hedging Policy: Active currency management is used to control risk and improve risk-adjusted returns. Benchmark hedge ratios (detailed below) are established for each asset class. Tactical shifts away from these benchmark hedge ratios are permitted. These tactical shifts reflect our in-house view of the respective currencies.

Hedge levels are monitored daily to check that the fund's hedge ratios remain in line with the desired benchmark level and within the SIPO limits.

3.1.13 Investment strategy review: Investment strategy reviews are conducted periodically as part of our strategic asset allocation review process. As part of this process, we determine the most effective target investment mix for each fund, based on each fund's stated investment objectives.

Asset class weightings are monitored daily to ensure they remain within the limits set out in this document. Funds are not automatically rebalanced to their benchmark weights, provided they remain within their permitted ranges.

3.2 Cash

3.2.1 Authorised Investments – Cash: Cash, cash on call, term deposits, debt securities and derivatives thereof.

3.2.2 Maturity Limits on Single Investments: The ultimate time to maturity of any single authorised investment must be no greater than six months.

3.3 New Zealand Fixed Interest

3.3.1 Authorised Investments – New Zealand Fixed Interest: Cash, term deposits, debt securities and derivatives thereof that are denominated in New Zealand dollars.

3.4 International Fixed Interest

3.4.1 Authorised Investments – International Fixed Interest: Term deposits, debt securities and derivatives thereof that are non-New Zealand dollar denominated. Outright short positions in debt securities or derivatives thereof are permitted. Forward foreign exchange contracts and currency swaps.

3.4.2 Currency Hedging Policy: The benchmark hedge ratio for International Fixed Interest securities is 100% hedged into NZD. The permitted range is 90% to 110%.

3.5 Direct Property

3.5.1 Authorised Investments – Direct Property: Interests in directly owned real property or related real property instruments and unlisted vehicles investing in real property. Derivatives thereof.

3.5.2 Options over Property Assets: Purchased options over property must be cash collateralised.

3.6 Australasian Shares

3.6.1 Authorised Investments – Australasian Shares: Securities issued traded in New Zealand or Australia (listed and unlisted) at time of purchase. Derivatives thereof. Forward foreign exchange contracts and currency swaps.

3.6.2 Underwriting or Sub-underwriting: Underwriting or sub-underwriting is permitted in terms of the authorised investments in this SIPO.

3.6.3 Currency Hedging Policy: The benchmark hedge ratio for Australian equities is 70% hedged into NZD. The permitted range is 0% to 110%. Proxy hedging is permitted.

3.7 International Shares

3.7.1 Authorised Investments – International Shares: Securities issued or traded outside of New Zealand and Australia (listed and unlisted). Derivatives thereof. Forward foreign exchange contracts and currency swaps.

3.7.2 Underwriting or Sub-underwriting: Underwriting or sub-underwriting is permitted in terms of the authorised investments in this SIPO.

3.7.3 Currency Hedging Policy: The benchmark hedge ratio for the International Shares portfolio is 50% hedged into the NZD. The permitted range is 0% to 110%. Proxy hedging (i.e. using the currency of a country as a proxy for the currency of another country) is permitted.

3.8 Other (Listed Property And Infrastructure)

3.8.1 Authorised Investments – Listed Property and Infrastructure: Securities in property and infrastructure companies traded in New Zealand, Australia and internationally. Derivatives thereof. Forward foreign exchange contracts and currency swaps.

3.8.2 Underwriting or Sub-underwriting: Underwriting or sub-underwriting is permitted in terms of the authorised investments in this SIPO.

3.8.3 Currency Hedging Policy: The benchmark hedge ratio for the Listed Property and Infrastructure portfolio is 70% hedged into the NZD. The permitted range is 0% to 110%. Proxy hedging (i.e. using the currency of a country as a proxy for the currency of another country) is permitted.

3.9 Alternative Assets

3.9.1 Authorised Investments – Alternative Assets: Investments, strategies or derivatives that may lie outside the traditional investment classes of cash, fixed interest, equities and property and therefore may not be included in the asset classes mentioned

above. Before any asset is classified as an alternative it must be approved by the Investment Policy Committee.

4. Benchmarks

4.1.1 Investment Benchmark: The Investment benchmark is calculated by using the respective asset class benchmarks weighted by the benchmark asset allocations.

4.1.2 Expected Tracking Error Relative to Investment Benchmark: It is expected that the tracking error (annualised standard deviation of quarterly excess return) will be less than 3%.

4.2 Cash

4.2.1 Asset Class Benchmark – Cash: S&P/NZX 90 Day Bank Bill Index or equivalent index.

4.3 New Zealand Fixed Interest

4.3.1 Asset Class Benchmark – New Zealand Fixed Interest: Bloomberg New Zealand Bond Composite 0+ Year Index or equivalent index.

4.4 International Fixed Interest

4.4.1 Asset Class Benchmark – International Fixed Interest: Barclays Capital Global Aggregate Index hedged into NZD or equivalent index.

4.5 Direct Property

4.5.1 Asset Class Benchmark – Direct Property: S&P/NZX All Real Estate Index.

4.6 Australasian Shares

4.6.1 Asset Class Benchmark – Australasian Shares: 50% S&P/NZX50 Gross Index including imputation credits and 50% S&P/ASX 200 Accumulation Index 70% hedged into NZD.

4.7 International Shares

4.7.1 Asset Class Benchmark – International Shares: S&P Global Large MidCap Index 50% hedged into NZD.

4.8 Other (Property And Infrastructure Assets)

4.8.1 Investment Benchmark: 65% S&P Global Infrastructure Index (70% hedged to NZD), 15% S&P/ASX200 A-REIT Index (70% hedged to NZD) and 20% S&P/NZX All Real Estate Index.

5. Governance

5.1.1 Role of the Manager: The Manager's role is to select investments that best achieve the aims of this SIPO, to exercise voting powers where appropriate in respect of these investments, to select external managers, to execute transactions to implement the investment strategy, monitoring adherence to this SIPO and reporting on this to the Fisher Funds Investment Policy Committee and the Supervisor, and to make recommendations as to how this SIPO could be improved.

The Manager is also responsible for appointing any external managers, ensuring they are competent to manage the asset class they are responsible for, and for monitoring their performance on a quarterly basis once they have been appointed. The performance of any external managers is reported to, and recommendations to appoint, or change an external manager are made to, the Investment Policy Committee.

5.1.2 Monitoring of compliance with this SIPO: Compliance with the benchmark asset allocations and prudential limits imposed by this SIPO is taken into consideration before trades are executed and monitored post-trade. The pre-trade compliance consists of using models that show the resulting asset allocation of the fund assuming the planned trade is executed. Portfolio Managers fully understand the prudential limits of the portfolios and take this into account when determining appropriate trades. Each day monitoring is undertaken to ensure the investments of the fund remain within the limits of the SIPO.

5.1.3 Consequences of Active Limit Breaks: An active limit break is a breach of this SIPO that is caused by the actions of the Manager. The Manager must correct such a breach within five business days and report it to the Compliance Officer who will then report it to the Supervisor as soon as practicable but in any instance within ten business days of the breach being identified by the Manager. The Compliance Officer will continue to keep the Supervisor informed until such a time as the breach has been rectified.

5.1.4 Consequences of Passive Infringements: A passive infringement is a violation of this SIPO that occurs due to cash flows or market movements or any other actions outside of the Manager's control. The Manager has five business days to correct the infringement from when it is identified. Passive infringements which are not corrected in this time frame must be reported to the Compliance Officer who will then report it to the Supervisor as soon as practicable.

5.1.5 Materiality of Limit Breaks: The following breaches of the SIPO are considered material:

- a) The range of an asset class is exceeded due to
 - i. an active break; or
 - ii. a passive infringement that is not rectified within ten business days of identification.
- b) An investment is made in a specifically prohibited security.
- c) An investment is made in a security that is not an authorised investment of the fund.
- d) The limit of borrowing is breached.
- e) Any other matter that is agreed as being material in consultation with the Supervisor.

Where any of the above breaches occur, the Manager will notify the breach to the Supervisor within five business days of becoming aware of the breach. A report will be provided as soon as practicable thereafter but in any instance within ten business days of the breach being identified by the Manager.

Any other breaches of the SIPO will be reported to the Supervisor on a quarterly basis.

5.1.6 Responsibility for Determining the SIPO: This SIPO has been determined by the Fisher Funds Investment Policy Committee in consultation with the Supervisor.

5.1.7 Responsibility for Executing the SIPO: The Manager is responsible for executing this SIPO.

5.1.8 Methodology for Measuring Performance against the Investment Objectives and the performance of external managers: The Fisher Funds Investment Policy Committee will monitor performance against both the primary and secondary investment objectives. Performance is measured and reviewed at least quarterly. This committee can make changes to delegated investment responsibilities if appropriate to correct investment performance shortfalls. External managers who manage discrete portfolios of assets for us provide monthly reports that enable us to measure performance versus benchmark, and to reconcile their performance and strategies to the objectives they are managing the portfolio to. We meet with Portfolio Managers or senior management either in person or via conference call periodically to discuss in detail the performance of the portfolio and the managers' current outlook and strategies that are in place. The performance of the funds and the manager's strategies are an agenda item for the Investment Policy Committee to review and discuss on a quarterly basis. Where we invest in a fund managed by external managers we will follow a similar procedure, though potentially we may not have the same accessibility to senior management and Portfolio Managers where our investment in the fund is not substantial.

5.1.9 Process for Reviewing and Updating the SIPO: The Fisher Funds Investment Policy Committee is responsible for conducting a review every two years of this SIPO and updating it if appropriate (subject to Supervisor approval). SIPO reviews take into consideration, but are not limited to, the following:

- a) review of a fund's target investment mix or investment objectives

- b) legal and regulatory changes; and
- c) industry best practice.

Ad hoc reviews are undertaken, where required, to implement changes to reflect current market conditions. The SIPO changes are drafted by the relevant Portfolio Manager and reviewed by the Chief Investment Officer, Head of Trading and the Compliance Manager prior to review by the Supervisor and sign off by the Investment Policy Committee.

5.1.10 Conflicts of Interest: The Manager has in place policies to identify and resolve potential conflicts of interest. Our Conflicts of Interest Policy can be found at <https://fisherfunds.co.nz/> and on the Disclose website.

5.11 Related Party Investment Transactions: With respect to investments or investment transactions with Fisher Funds Management Limited, the Supervisor, or related parties, Fisher Funds Management Limited may enter into any transaction provided that the transaction is effected on an arm's length basis and on normal commercial terms, is in accordance with this SIPO and is in the best interests of investors.

1. Introduction

1.1.1 Name of Managed Investment Scheme: Fisher Funds KiwiSaver Scheme

1.1.2 Name of Fund: Growth Fund

1.1.3 Description of the Fund: The Fisher Funds KiwiSaver Growth Fund aims to grow your investment over the long term by investing in mainly growth assets.

1.1.4 Supervisor: The supervisor of the fund is Trustees Executors Limited (the Supervisor).

1.1.5 Purpose of this SIPO: This document sets out the objectives and policies governing investment decisions in relation to the fund. The current SIPO is available on the Fisher Funds website, at <https://fisherfunds.co.nz/> and on the Disclose Register, at <https://disclose-register.companiesoffice.govt.nz/>.

2. Risk and Return

2.1.1 Investor Suitability: This fund is suitable for a long term investor who can tolerate volatility of returns in the expectation of potential higher returns and who has time on their side.

2.1.2 Risk Description: This is a high risk fund.

2.1.3 Investment Type: This is a growth-oriented diversified fund.

2.1.4 Return Expectations: On a scale of 1 to 5, where returns from Cash assets are 1 and returns from Share assets are 5, we expect the fund to be 4.

2.1.5 Primary Investment Objective: The aim of the fund is to grow savings with more focus on capital growth over the long term.

2.1.6 Secondary Investment Objective: The aim is to meet or exceed the return of the investment benchmark before fees and tax over the long term.

2.1.7 Investor Liquidity Requirements: KiwiSaver members are able to make withdrawals within five business days when they reach retirement age or certain other criteria are met. All KiwiSaver members are able to switch to another provider within ten business days. However, it is highly unlikely that all members will be withdrawing or switching at the same time and therefore as a whole, investor liquidity requirements are deemed to be low and therefore liquidity is not given significant consideration when making investment decisions.

3. Investments

3.1 General

3.1.1 Typical Investments: Predominantly shares in New Zealand, Australia and other international markets. Cash and fixed interest securities. The Manager may also hold derivatives, property and alternative assets.

3.1.2 Investment Philosophy: We believe superior investment returns can be achieved over time through adopting an active management approach. The principles that underpin this are:

- a) We are long term investors, seeking to build deep knowledge of our investments, which we think give us the best chance of picking winners and avoiding losers.
- b) We focus on the factors that we can predict and understand, like the quality and competitive advantage of a particular company, rather than unpredictable factors such as exchange rates.
- c) We understand the difference between price and value, and we know the market will get it wrong from time to time. We rely on our own assessment of value, rather than the market's price.
- d) By diversifying our investment portfolios across industries, sectors, and geographies we seek to guard against any one investment having an undue influence on overall returns.
- e) We are responsible investors who embed our environmental, social, and governance principles inside our research process.

3.1.3 Aspects of the Fund that will be managed by External Managers: It is possible that some of the fund's assets will be managed by external investment managers. When selecting an external manager, we conduct due diligence including an assessment of their investment performance, financial stability, experience, reputation and history, quality and reliability of services provided to other customers, fees and costs, and the transparency of each, number and competence of staff and managers, organisational 'fit' with Fisher Funds and its strategic direction.

3.1.4 Investing in Other Funds: The fund may invest in units or sub-units or other shares or interest in any fund or managed investment scheme where the underlying assets are primarily investments that are authorised investments in other sections of this SIPO.

3.1.5 Minimum, Benchmark and Maximum Asset Class weightings:

Asset Class	Benchmark Asset Allocation (Long Term Target)	Minimum	Maximum
Cash	1.0%	0.0%	30.0%
New Zealand Fixed Interest	11.0%	0.0%	30.0%
International Fixed Interest	7.0%	0.0%	15.0%
Total Income Assets	19.0%	0.0%	30.0%
Direct Property	4.5%	0.0%	10.0%
Australasian Shares	25.0%	10.0%	50.0%
International Shares	47.0%	20.0%	80.0%
Other*	4.5%	0.0%	10.0%
Total Growth Assets	81.0%	70.0%	100.0%
Alternatives	0.0%	0.0%	10.0%

***Other** refers to a portfolio of listed property and listed infrastructure assets.

3.1.6 Classification of Alternatives: The characteristics of any Alternative asset will determine whether it is classified as an Income or Growth Asset.

3.1.7 Need for Liquidity in Assets: Given the stable nature of KiwiSaver investors it is expected that liquidity needs of the fund can be met through the market liquidity of its securities and no special provisions for additional liquidity are needed.

3.1.8 Prohibited Investments: The fund is prohibited from investing directly or indirectly in securities issued by companies on the Fisher Funds Prohibited Companies List. This list is informed by the Fisher Funds Responsible Investment Policy available at www.fisherfunds.co.nz.

3.1.9 Responsible Investing: Where company analysis is carried out, the Manager will have regard for the environmental, social and governance issues of companies that the fund invests in.

3.1.10 Use of Derivatives: The fund is permitted to use derivatives that reference investments that are authorised in this SIPO. Where derivatives are used the resulting portfolio exposures to investments plus the economic exposure derived by derivative positions must comply with all appropriate guidelines in this SIPO.

3.1.11 Asset Class Rebalancing: The weightings in each asset class will be reviewed, at least, weekly and rebalanced if appropriate. The Manager will have regard for transaction costs when considering whether a rebalancing is appropriate.

3.1.12 Hedging Policy: Active currency management is used to control risk and improve risk-adjusted returns. Benchmark hedge ratios (detailed below) are established for each

asset class. Tactical shifts away from these benchmark hedge ratios are permitted. These tactical shifts reflect our in-house view of the respective currencies.

Hedge levels are monitored daily to check that the fund's hedge ratios remain in line with the desired benchmark level and within the SIPO limits.

3.1.13 Investment strategy review: Investment strategy reviews are conducted periodically as part of our strategic asset allocation review process. As part of this process, we determine the most effective target investment mix for each fund, based on each fund's stated investment objectives.

Asset class weightings are monitored daily to ensure they remain within the limits set out in this document. Funds are not automatically rebalanced to their benchmark weights, provided they remain within their permitted ranges.

3.2 Cash

3.2.1 Authorised Investments – Cash: Cash, cash on call, term deposits, debt securities and derivatives thereof.

3.2.2 Maturity Limits on Single Investments: The ultimate time to maturity of any single authorised investment must be no greater than six months.

3.3 New Zealand Fixed Interest

3.3.1 Authorised Investments – New Zealand Fixed Interest: Cash, term deposits, debt securities and derivatives thereof that are denominated in New Zealand dollars.

3.4 International Fixed Interest

3.4.1 Authorised Investments – International Fixed Interest: Term deposits, debt securities and derivatives thereof that are non-New Zealand denominated. Outright short positions in debt securities or derivatives thereof are permitted. Forward foreign exchange contracts and currency swaps.

3.4.2 Currency Hedging Policy: The benchmark hedge ratio for International Fixed Interest securities is 100% hedged into NZD. The permitted range is 90% to 110%.

3.5 Direct Property

3.5.1 Authorised Investments – Direct Property: Interests in directly owned real property or related real property instruments and unlisted vehicles investing in real property. Derivatives thereof.

3.5.2 Options over Property Assets: Purchased options over property must be cash collateralised.

3.6 Australasian Shares

3.6.1 Authorised Investments – Australasian Shares: Securities issued traded in New Zealand or Australia (listed and unlisted) at time of purchase. Derivatives thereof. Forward foreign exchange contracts and currency swaps.

3.6.2 Underwriting or Sub-underwriting: Underwriting or sub-underwriting is permitted in terms of the authorised investments in this SIPO.

3.6.3 Currency Hedging Policy: The benchmark hedge ratio for Australian equities is 70% hedged into NZD. The permitted range is 0% to 110%. Proxy hedging is permitted.

3.7 International Shares

3.7.1 Authorised Investments – International Shares: Securities issued or traded outside of New Zealand and Australia (listed and unlisted). Derivatives thereof. Forward foreign exchange contracts and currency swaps.

3.7.2 Underwriting or Sub-underwriting: Underwriting or sub-underwriting is permitted in terms of the authorised investments in this SIPO.

3.7.3 Currency Hedging Policy: The benchmark hedge ratio for the International Shares portfolio is 50% hedged into the NZD. The permitted range is 0% to 110%. Proxy hedging (i.e. using the currency of a country as a proxy for the currency of another country) is permitted.

3.8 Other (Listed Property and Infrastructure)

3.8.1 Authorised Investments – Listed Property and Infrastructure: Securities in property and infrastructure companies traded in New Zealand, Australia and internationally. Derivatives thereof. Forward foreign exchange contracts and currency swaps.

3.8.2 Underwriting or Sub-underwriting: Underwriting or sub-underwriting is permitted in terms of the authorised investments in this SIPO.

3.8.3 Currency Hedging Policy: The benchmark hedge ratio for the Listed Property and Infrastructure portfolio is 70% hedged into the NZD. The permitted range is 0% to 110%. Proxy hedging (i.e. using the currency of a country as a proxy for the currency of another country) is permitted.

3.9 Alternative Assets

3.9.1 Authorised Investments – Alternative Assets: Investments, strategies or derivatives that may lie outside the traditional investment classes of cash, fixed interest, equities and property and therefore may not be included in the asset classes mentioned

above. Before any asset is classified as an alternative it must be approved by the Investment Policy Committee.

4. Benchmarks

4.1.1 Investment Benchmark: The Investment benchmark is calculated by using the respective asset class benchmarks weighted by the benchmark asset allocations.

4.1.2 Expected Tracking Error Relative to Investment Benchmark: It is expected that the tracking error (annualised standard deviation of quarterly excess return) will be less than 5%.

4.2 Cash

4.2.1 Asset Class Benchmark – Cash: S&P/NZX 90 Day Bank Bill Index or equivalent index.

4.3 New Zealand Fixed Interest

4.3.1 Asset Class Benchmark – New Zealand Fixed Interest: Bloomberg New Zealand Bond Composite 0+ Year Index or equivalent index.

4.4 International Fixed Interest

4.4.1 Asset Class Benchmark – International Fixed Interest: Barclays Capital Global Aggregate Index hedged into NZD or equivalent index.

4.5 Direct Property

4.5.1 Asset Class Benchmark – Direct Property: S&P/NZX All Real Estate Index.

4.6 Australasian Shares

4.6.1 Asset Class Benchmark – Australasian Shares: 50% S&P/NZX50 Gross Index including imputation credits and 50% S&P/ASX 200 Accumulation Index 70% hedged into NZD.

4.7 International Shares

4.7.1 Asset Class Benchmark – International Shares: S&P Global Large MidCap Index 50% hedged into NZD.

4.8 Other (Property and Infrastructure Assets)

4.8.1 Investment Benchmark: 65% S&P Global Infrastructure Index (70% hedged to NZD), 15% S&P/ASX200 A-REIT Index (70% hedged to NZD) and 20% S&P/NZX All Real Estate Index

5. Governance

5.1.1 Role of the Manager: The Manager's role is to select investments that best achieve the aims of this SIPO, to exercise voting powers where appropriate in respect of these investments, to select external managers, to execute transactions to implement the investment strategy, monitoring adherence to this SIPO and reporting on this to the Fisher Funds Investment Policy Committee and the Supervisor, and to make recommendations as to how this SIPO could be improved.

The Manager is also responsible for appointing any external managers, ensuring they are competent to manage the asset class they are responsible for, and for monitoring their performance on a quarterly basis once they have been appointed. The performance of any external managers is reported to, and recommendations to appoint, or change an external manager are made to, the Fisher Funds Investment Policy Committee.

5.1.2 Monitoring of compliance with this SIPO: Compliance with the benchmark asset allocations and prudential limits imposed by this SIPO is taken into consideration before trades are executed and monitored post-trade. The pre-trade compliance consists of using models that show the resulting asset allocation of the fund assuming the planned trade is executed. Portfolio Managers fully understand the prudential limits of the portfolios and take this into account when determining appropriate trades. Each day monitoring is undertaken to ensure the investments of the fund remain within the limits of the SIPO.

5.1.3 Consequences of Active Limit Breaks: An active limit break is a breach of this SIPO that is caused by the actions of the Manager. The Manager must correct such a breach within five business days and report it to the Compliance Officer who will then report it to the Supervisor as soon as practicable but in any instance within ten business days of the breach being identified by the Manager. The Compliance Officer will continue to keep the Supervisor informed until such a time as the breach has been rectified.

5.1.4 Consequences of Passive Infringements: A passive infringement is a violation of this SIPO that occurs due to cash flows or market movements or any other actions outside of the Manager's control. The Manager has five business days to correct the infringement from when it is identified. Passive infringements which are not corrected in this time frame must be reported to the Compliance Officer who will then report it to the Supervisor as soon as practicable.

5.1.5 Materiality of Limit Breaks: The following breaches of the SIPO are considered material:

- a) The range of an asset class is exceeded due to
 - i. an active break; or
 - ii. a passive infringement that is not rectified within ten business days of identification.
- b) An investment is made in a specifically prohibited security.
- c) An investment is made in a security that is not an authorised investment of the fund.
- d) The limit of borrowing is breached.
- e) Any other matter that is agreed as being material in consultation with the Supervisor.

Where any of the above breaches occur the Manager will notify the breach to the Supervisor within five business days of becoming aware of the breach. A report will be provided as soon as practicable thereafter but in any instance within ten business days of the breach being identified by the Manager.

Any other breaches of the SIPO will be reported to the Supervisor on a quarterly basis.

5.1.6 Responsibility for Determining the SIPO: This SIPO has been determined by the Fisher Funds Investment Policy Committee in consultation with the Supervisor.

5.1.7 Responsibility for Executing the SIPO: The Manager is responsible for executing this SIPO.

5.1.8 Methodology for Measuring Performance against the Investment Objectives and the performance of external managers: The Fisher Funds Investment Policy Committee will monitor performance against both the primary and secondary investment objectives. Performance is measured and reviewed at least quarterly. This committee can make changes to delegated investment responsibilities if appropriate to correct investment performance shortfalls. External managers who manage discrete portfolios of assets for us provide monthly reports that enable us to measure performance versus benchmark, and to reconcile their performance and strategies to the objectives they are managing the portfolio to. We meet with Portfolio Managers or senior management either in person or via conference call periodically to discuss in detail the performance of the portfolio and the managers current outlook and strategies that are in place. The performance of the funds and the manager's strategies are an agenda item for the Investment Policy Committee to review and discuss on a quarterly basis. Where we invest in a fund managed by external managers we will follow a similar procedure, though potentially we may not have the same accessibility to senior management and Portfolio Managers where our investment in the fund is not substantial.

5.1.9 Process for Reviewing and Updating the SIPO: The Fisher Funds Investment Policy Committee is responsible for conducting a review every two years of this SIPO and updating it if appropriate (subject to Supervisor approval). SIPO reviews take into consideration, but are not limited to, the following:

- a) review of a fund's target investment mix or investment objectives
- b) legal and regulatory changes; and

c) industry best practice

Ad hoc reviews are undertaken where required to implement changes to reflect current market conditions. The SIPO changes are drafted by the relevant Portfolio Manager and reviewed by the Chief Investment Officer, Head of Trading and the Compliance Manager prior to review by the Supervisor and sign off by the Investment Policy Committee.

5.1.10 Conflicts of Interest: The Manager has in place policies to identify and resolve potential conflicts of interest. Our Conflict of Interest Policy can be found at <https://fisherfunds.co.nz/> and on the Disclose website.

5.11 Related Party Investment Transactions: With respect to investments or investment transactions with Fisher Funds Management Limited, the Supervisor, or related parties, Fisher Funds Management Limited may enter into any transaction provided that the transaction is effected on an arm's length basis and on normal commercial terms, is in accordance with this SIPO and is in the best interests of investors.