Maritime KiwiSaver Scheme

Statement of Investment Policy and Objectives

Date: 10 March 2025

Introduction

This Statement of Investment Policy and Objectives (**SIPO**) applies to the Maritime KiwiSaver Scheme (**Scheme**) which is a restricted KiwiSaver scheme registered under the Financial Markets Conduct Act 2013 (**Act**).

Principal Purpose

The principal purpose of the Scheme is to provide retirement benefits to

- workers within the waterfront industry
- seafarers who are members of the Maritime Union of New Zealand (MUNZ).

The Scheme solely invests into and is a member of the Maritime Retirement Scheme. The principal purpose of the Maritime Investment Scheme is the same as the Scheme's.

Governance and Administration

The Scheme is governed by trustees appointed by MUNZ to represent members and by employer organisations or the trustees to represent the employers of waterside workers and the employers of seafarers. These trustees also appoint a chairman and a Licensed Independent Trustee.

The Scheme is administered by Melville Jessup Weaver (MJW). MJW is also the Scheme's Investment Consultant.

Member Choices

The Scheme offers its members three investment options, a growth portfolio, a balanced portfolio and a conservative portfolio, with members having the right to invest in any of these portfolios and the right to shift their funds between these portfolios. This gives members a choice of investment options so that they can match their investments to their individual financial circumstances. The members can elect to split their investment across multiple portfolios.

Tax Treatment

The Scheme operates as a Portfolio Investment Entity (**PIE**). Tax is paid on behalf of members based on the individual Prescribed Investor Rates notified by members.

Effective and Review Dates

This SIPO takes effect on 10 March 2025 and will next be reviewed, in consultation with the Scheme's Investment Consultant, no later than March, 2026. Depending on the overall performance of the Scheme, the trustees may review this SIPO at any time.

Availability of this SIPO

The most current version of this SIPO is available on the register entry for MKS on the Disclose website at https://disclose-register.companiesoffice.govt.nz/.

Roles and Responsibilities

The trustees are responsible for the investment of the Scheme's assets in accordance with the legislative requirements of the Act, the Trust Deed, the Product Disclosure Statement (**PDS**) and this SIPO. The Act requires the trustees to exercise the care, diligence and skill that a prudent person of business would exercise in the same circumstances.

The trustees' roles and responsibilities include:

- maintaining an investment governance framework
- defining their investment beliefs and prescribing their investment processes
- setting investment objectives and a risk tolerance for each investment option
- determining the investment strategy for each investment option, including target asset allocations, tolerance ranges, and benchmark indices
- implementing the investment strategies including the appointment of investment managers
- monitoring the investment performance of the portfolios relative to their objectives, and the performance of each investment manager and product relative to their benchmark indices and the returns for equivalent investment products
- communicating investment performance to members.

The trustees seek advice from time to time from its Administrator and Investment Consultant (MJW), recognising that the trustees are ultimately responsible for the investment of the funds of the Scheme.

Investment Beliefs and Philosophies

The beliefs and philosophies of the trustees are:

- asset allocations between growth and income assets is the primary determinant of investment returns and risks
- portfolios with more growth assets and less income assets are expected to realise higher long-term returns but these returns are expected to be more volatile with more risk of negative returns and conversely portfolios with less growth assets and more income assets are expected to realise lower long-term returns but these returns are expected to be less volatile with less risk of negative returns
- well-constructed diversified portfolios reduce overall volatility and delivers more consistent returns
- although investment markets are generally efficient, asset prices do not always reflect fair
 value and investors do not always behave rationally hence good fund managers can
 potentially add value from active management (stock selection) but tactical asset allocation
 and active currency management are unreliable source of added value
- good governance, robust decision-making processes and well-managed implementation and monitoring are important to achieving the Scheme's objectives.

Objectives

The objective of the growth, balanced and conservative portfolios is to outperform, over the medium term, the weighted average return of the market indices used to measure the performance of the underlying assets of each portfolio.

The growth portfolio aims to achieve a return which is higher than the return from fixed income and cash. Over the long term, the growth portfolio aims to grow the real value of the capital invested (i.e. allowing for the effects of inflation), after fees and tax are deducted.

The Balanced Portfolio aims to achieve a return which is higher than the return from fixed income and cash but is less volatile than the growth portfolio. Over the long term, the balanced portfolio aims to modestly grow the real value of the capital invested, after fees and tax are deducted.

The Conservative Portfolio aims to achieve a return which is less volatile than the Balanced Portfolio, but which is marginally better than could be had from investing solely in fixed income and cash. Over the long term, the Conservative Portfolio aims to maintain the real value of the capital invested, after fees and tax are deducted.

The trustees recognise that investment markets are volatile and there will be times when investment returns lag or exceed expectations. The asset allocations have been set in the expectation that the investment returns being sought will be achieved over a medium-term timeframe of 5 to 10 years and that they might not be achieved over the short term.

Strategic Asset Allocation

In determining a strategic asset allocation for each investment option, i.e. the growth, balanced and conservative portfolios, the trustees determine the overall allocation to growth and income assets, and then the allocation to each sector within the growth and income asset classes, taking into account:

- expected risks and returns of different mixes of assets relative to the objectives of each investment option
- overall composition and diversification of the portfolios
- availability of suitable investment opportunities within each sector.

The current target asset allocations and ranges of the portfolios are:

| Asset Class/Sector Growt | | Portfolio 6) | Balanced Portfolio (%) | | Conservative Portfolio (%) | |
|------------------------------------|--------|-----------------|---------------------------|-----------------|----------------------------|-----------------|
| | Target | Range | Target | Range | Target | Range |
| Growth Assets | | | | | | |
| Global Equities | 64 | 54-74 | 48 | 38-58 | 16 | 1-21 |
| Australasian Equities | 16 | 9-23 | 12 | 7-17 | 4 | 1-7 |
| Subtotal –Growth Assets | 80 | 75-85 | 60 | 55-65 | 20 | 15-25 |
| Income Assets | | | | | | |
| Global Bonds | 12.75 | 7.75-17.75 | 26.25 | 16.25- 36.25 | 48.75 | 38.75- 58.75 |
| NZ Bonds | 4.25 | 1.25-7.25 | 8.75 | 3.75- 13.75 | 16.25 | 8-24.5 |
| Subtotal - Bonds | 17 | 10-27 | 35 | 25-45 | 65 | 55-75 |
| Cash | 3 | 0-8 | 5 | 0-10 | 15 | 10-20 |
| Subtotal – Income Assets | 20 | 15-25 | 40 | 35-45 | 80 | 75-85 |
| Total | 100 | | 100 | | 100 | |
| Global Equities Currency hedging % | 50 | 45-55 | 50 | 45-55 | 50 | 45-55 |

The target currency allocations are to hedge currency 100% for global bonds and 50% (after tax at 28%) for global equities (excluding Australian equities). Australian equities are hedged at discretion of the managers. These hedging strategies are generally managed passively by the respective fund managers.

The Maritime KiwiSaver Scheme seeks to achieve these target asset allocations by investing solely into and being a member of the Maritime Retirement Scheme. The strategic asset allocation of the Maritime Retirement Scheme is identical to the Scheme's.

Investments

The investment policy of the Maritime KiwiSaver Scheme is identical to the investment policy of the Maritime Retirement Scheme which is to invest into pooled investment products, managed by specialist investment managers within their investment market, generally with mandates to invest in the full range of investment opportunities within their sector. The trustees seek products that are well constructed and have achieved above average returns, consistent with the risk profile of each portfolio.

Specific factors taken into account by the trustees of the Maritime Retirement Scheme in selecting fund managers and products for each asset sector include, inter alia:

- clearly defined and consistently applied investment philosophies
- investment styles consistent with their philosophies
- sound and disciplines investment processes
- organisational and personnel strength and stability
- the availability and reliability of valuation information
- the need for liquidity having regard to expected cash flow requirements
- tax efficiency
- investment management fees
- past performance
- responsible investment policy and/or integration of environmental, social and governance factors.

Investment managers' products are selected under the expectation that their characteristics will broadly reflect the market sector they are tasked with managing. While active managers (where they are used in lieu of passive or index-tracking managers) are expected to take active positions away from the market index in order to achieve superior investment returns (or mitigate risk), they are not expected to modify the characteristics of their portfolios such that their portfolios do not broadly reflect market dynamics. The trustees regularly monitor the performance of the Scheme's investment managers to ensure their products are performing as expected.

The table below lists the current investments including their benchmark indices against which returns are measured. It also shows currency hedging arrangements and tax treatment for each investment.

| Asset Sector | Fund Manager | Investment Product | Benchmark Index | Performance Objective | Currency Hedge | Tax Treatment |
|--------------------------|---------------------------------------|---|---|----------------------------|--|-------------------------------|
| Global Equities | Nikko AM New Zealand | Global Equity Multi- Manager Hedged | MSCI All Countries World Index (net dividends reinvested) 100% gross hedged to NZD | Index + 2% per annum | 100% hedged | FDR |
| | Mercer Investments | Mercer Overseas Shares Index Portfolio A | MSCI World Index excluding Tobacco, Controversial and Nuclear Weapons | Index + 0% per annum | 0% hedged | FDR |
| Australasian Equities | Fisher Funds Management Ltd | Australian Growth Fund | S&P ASX 200 | Index + 0% per annum | 70% hedged | Taxed on dividends only |
| | Fisher Funds Management Ltd | Trans- Tasman Equity Fund | S&P/NZX50 Gross Index (50%) / S&P/ASX 200 Index (50%) | Index + 0% per annum | 70% hedged on the Australian component | Taxed on dividends only |
| | Salt Funds Management | Salt NZ Core Fund | S&P/NZX50 Gross Index (incl Imputation Credits) | Index + 0% per annum | NZ (any Australian exposure hedged at manager's discretion) | Taxed on dividends only |
| Global Bonds | Harbour Asset Management Ltd | Hunter Global Fixed Interest Fund | Bloomberg Global Aggregate | Index + 0.75% per annum | 100% | CV |
| | Nikko AM New Zealand | Global Bond Fund | Bloomberg Global Aggregate | Index + 1% per annum | 100% | CV |
| NZ Bonds | Nikko AM New Zealand | Wholesale NZ Bond Fund | Bloomberg NZBond Composite 0+ Yr Index | Index + 0.6% per annum | NA | CV |
| Cash | Nikko AM New Zealand | Wholesale NZ Cash Fund | Bloomberg NZBond Bank Bill Index | Index + 0.2% per annum | NA | CV |

Restrictions that trustees impose on the Scheme's investments are:

- futures contracts and options are generally to be restricted to hedging techniques and not be used to leverage the portfolio
- financial products may not be lent to any third party without the consent of the trustees.

Implementation Policies and Procedures

The trustees have a range of policies and procedures to support its investment governance framework, as follows:

Investment Performance Monitoring

The trustees continuously review the overall performance and risks of each portfolio and of each investment. This process involves:

- monitoring the returns of each portfolio relative to the investment objectives set down in this SIPO and the returns of equivalent products
- assessing the extent to which the objectives of each portfolio are being achieved and are expected to be achieved in the future
- monitoring the performance of each asset sector and each investment against the selected asset sector benchmarks set down in this SIPO
- assessing the value being added from the active management of each asset sector
- monitoring the investment risks associated with each portfolio and identifying and assessing any particular weaknesses or concerns with the investment strategies of each portfolio, fund manager or investment product
- assessing whether each investment is expected to successfully meet its objectives.

This monitoring is generally undertaken on a quarterly basis with advice from the Investment Consultant. In addition to investment performance, factors taken into account in monitoring fund managers include investment style, organisational strength including personnel changes, and other factors considered relevant to the manager's continuing ability to meet the applicable investment objectives.

Benchmark Returns and Rebalancing

The trustees employ a rebalancing process to ensure that generally the actual asset allocations of each portfolio are close to the target asset allocation. Rebalancing may be required as a consequence of variations between the returns of the different asset sectors or members shifting their investments between portfolios. A tolerance range of plus or minus 1.5% is applied.

The Investment Consultant monitors the actual allocations against the target allocations on a monthly basis and if the actual allocations of any asset sector is outside a tolerance range of 1.5% the portfolios are generally rebalanced. This rebalancing can often be achieved within the cash flow resulting from member contributions and benefit payments but it also may involve selling investments in asset sectors that are overweight and reinvesting in asset sectors that are underweight.

The trustees may decide not to rebalance to be within the 1.5% tolerance range provided the actual asset allocations to each sector are within the target asset allocation ranges.

For the avoidance of doubt, a breach of the 1.5% tolerance will not be treated as a limit break for the purpose of reporting to the Financial Markets Authority. Additionally, a breach of the ranges which is short-term in nature and due to transitioning between managers or funds will not generally be considered a limit break.

Liquidity Management

Liquidity is maintained to meet member benefit payments, fees and expenses, and taxation payments. Most investments are in pooled products of equities and bonds, which can be redeemed at short notice to avoid distorting overall asset allocations.

The Administrator closely monitors cash flow requirements. Generally, cash investments are utilised initially to meet liquidity requirements and investments are subsequently rebalanced as necessary.

Conflicts of Interest

Trustees are appointed by MUNZ to represent the members, the Ports Industry Association appoints trustees to represent the contributing employers ie; Port and Stevedoring companies. The trustees appoint trustees to represent the New Zealand Shipping Federation employers.

Notwithstanding the individual interests of these members and the interests of employers, all trustees recognise their responsibility to act in the wider interests of all members and to treat members equitably.

Trustees, the Administrator and other professional services providers all recognise and acknowledge the requirement for them to avoid improper use of information and to comply with general prohibitions regarding unauthorised transactions between related parties.

Any specific conflicts of interest are managed as they arise. If a conflict arises, the process for managing the conflict will entail identifying and recording the conflict, assessing the conflict and taking appropriate measures, if necessary, to manage the conflict. In the case of trustees, this could involve the trustee standing aside from any decisions related to the conflict.

Risk Management

The trustees mitigate risks by solely investing in the Maritime Retirement Scheme, which in turn spreads investments across a range of growth and income assets, including cash and alternative assets (if suitable investment products are available).

Equities are spread across global and Australasian markets and bonds are spread across global and New Zealand markets. Managers are appointed with pooled products that spread the investments within their sectors across a wide range of investments.

The table below describes each investment risk and the measures adopted by the trustees of the Maritime Retirement Scheme to mitigate these risks:

| Risk | Description | Mitigation Measures |
|--------------------------------|---|--|
| Market risks | Macro-economic effects, global and in New Zealand, can and do affect investment markets and hence affect overall investment returns and/or the returns of individual asset classes. | The trustees engage an Investment Consultant who monitors macroeconomic trends and advises the trustees on changes to portfolio asset allocations and investment management appointments to take account of macro-economic trends. |
| Stock selection risks | The trustees generally engage active managers. This policy of active management of investments may result in investments underperforming benchmark returns if managers make poor short-term stock selections. | The trustees rigorously assess managers during the selection process and select managers which are considered to have the capability to achieve superior results based on good stock selections. The trustees continuously monitor the performance of the selected fund managers with advice from the Investment Consultant |
| Interest rate and credit risks | Movements in interest rates and risks of credit defaults may adversely affect the value of securities and the return on bond investments. | The trustees invest in bond pools with managers who have discretion to take account of expected movements in interest rates and credit risks. |
| Currency risks | Global investments denominated in foreign currencies can be adversely affected if the NZ dollar appreciates in value. | Global bond investments are fully hedged back to NZ dollars and global equity investments are partially hedged. |
| Liquidity risks | The Scheme periodically needs cash to pay member benefits, tax and other expenses. There is a risk that the Scheme may not be able to redeem investments to make such payments or, if investments in only some investment sectors can be redeemed, asset allocations may deviate from the target allocations. | The Scheme invests primarily in pools of equities and bonds that are generally liquid. Also the portfolios have cash holding. |
| Derivative risks | rivative risks Using derivatives could expose the Scheme to additional investment risks. | |

Responsible investment

The Scheme generally invests in pooled funds and hence the Trustees have limited ability to influence the investment, and the voting and other engagement activities of the Scheme's underlying fund managers. Nonetheless, the trustees have an expectation that fund managers will invest responsibly to avoid or mitigate environmental, social and governance (ESG) risks.

The trustees' criteria for assessing the ESG policies of fund managers are their:

- processes for integrating ESG risks in their investment decisions
- exclusion of companies which have material activities in the manufacture of controversial weapons (such as cluster munitions, anti-personnel mines, and biological/chemical weapons), the manufacture and distribution of tobacco products, or activities that are banned under New Zealand law or by international treaties to which New Zealand is a signatory
- ESG policies on proxy voting and engagement with companies with whom they invest.