

Otago Community Trust

Statement of Investment Objectives and Policy

Adopted on 28th June 2022

Contents

Statement of Investment Policy and Objectives.....	1
1. Introduction.....	2
2. Governance.....	3
3. Investment beliefs	4
4. Investment strategy.....	5
5. Risk	8
6. Performance measurement, review & reporting	9
7. Appendices.....	10

Statement of Investment Policy and Objectives

Effective date

This Statement of Investment Policy and Objectives ('SIPO') takes effect from the date of approval by the Board, 28th June 2022

Review date

This is the revised SIPO for the Otago Community Trust's assets and was adopted in 2022.

The date of the next annual SIPO review is December 2022 with a formal three-year review in December 2024 or sooner if policies, strategy or market conditions warrant.

1. Introduction

This Statement of Investment Policy and Objectives (the “SIPO”) prepared by the Trustees (the “Trustees”) of the Otago Community Trust (the “Trust”) sets out the beliefs, objectives and policies governing decisions about investments of the Trust’s assets.

This SIPO takes account of the requirements of:

- The Trust Deed;
- The Trusts Act 2019; and
- The Community Trusts Act 1999.

Background

The Trust’s investment portfolio (the “Fund”) began in its current form following the public listing of Trust Bank in 1994, when around \$63m was generated by the sale of 30m shares at \$2.10 per share. The base capital of the Fund was formally established at \$63m in December 1994 and then increased to \$131.4m in June 1996 when the remaining shareholding (24m shares) in Trust Bank was sold.

Investment Objectives

The investment objectives of the Trust are:

- To maintain a consistent and sustainable level of distributions which can be financed by the investment of the Fund over the long term; and
- To preserve the real value of capital; and
- To maintain equity between present and future generations with respect to the amounts available for distribution; and
- To maintain the highest degree of stability of investment earnings that is possible, consistent with the preceding objectives.

Investment Policy

- Investment risk must be minimised for the expected level of return;
- The Fund must be well diversified across various asset classes, across growth and income profiles, across countries, and across individual investments within each asset class;
- An appropriate level of liquidity must be maintained;
- Purely speculative investments must be avoided;
- Trustee legal responsibilities must be satisfied;
- Without compromising the long-term return outcomes of the Fund, Trustees should be conscious of the principles of responsible investing as detailed in the Trust’s Responsible Investment Policy, and apply those principles as they consider appropriate;
- Investment returns should, from time to time, be considered net of fees and other costs. Costs can be direct or indirect and may include implementation delays, transaction costs, fees, commissions, market impact costs and taxes;

2. Governance

The Trustee's powers and discretions are defined in the Trust Deed. In satisfying its responsibilities, the Trustee may delegate decision-making and implementation to other parties as it sees fit.

The consequent responsibilities of the various parties currently involved in the management of the Trust's assets are outlined below.

Management – CEO

- Providing performance reports to the Board
- Arranging redemptions to meet the Trust's commitment to grants and expenses
- Developing and implementing the annual investment workplan
- Liaising with the implemented consultant in relation to day-to-day investment matters and the overall performance of the Fund
- Ensuring appropriate documentation of Trustee decisions

Trustees

- Agreeing and reviewing investment objectives and policies
- Setting and reviewing on a regular basis a set of investment assumptions
- Setting and reviewing on a regular basis the Trust's reserving policy
- Setting and reviewing on a regular basis asset allocation strategy
- Developing and reviewing on a regular basis asset class strategies
- Selecting and reviewing on a regular basis the implemented consultant
- Setting and reviewing on a regular basis the rebalancing policy
- Determining and reviewing on a regular basis currency hedging levels
- Ensuring processes exist to receive and review the internal controls reports of the investment managers and their respective custodians, where applicable

Implemented consultant

- Offering funds or advice on suitable third-party products for each applicable asset class, consistent with the fundamental strategy and the foreign currency hedging policies determined by the Trustees.
- Maintaining the actual asset allocation within the specified rebalancing ranges in accordance with the rebalancing policies set out in the SIPO.
- Providing the Trustees with reports relating to the Fund's investment performance.
- Advising the Trustees of any market developments or best practice changes that may affect the way that the Fund's assets are or should reasonably be invested.
- Attending meetings with the Trustees, as required.
- Providing the Trustees with advice on other relevant investment issues.

3. Investment beliefs

The Trustees have an established set of investment beliefs or philosophies that guide its investment of the Trust's assets:

- The role of the Trustees is primarily one of governance. A robust governance structure that utilises suitably qualified resources with effective decision-making structures and clear accountabilities will improve the likelihood of the Trust's portfolio achieving its long-term investment goals.
- The strategic asset allocation is the key investment decision as this will have the greatest impact on the Trust's financial outcomes.
- Departures from the strategic asset allocation (SAA), including the foreign currency exposure, can enhance risk-adjusted returns, but can also add significant risk relative to the SAA portfolio. Such departures should only be contemplated where confidence in success is commensurate with the risk involved, and there is an appropriate decision-making structure in place.
- Diversification across securities, asset classes and investment managers, has the potential to improve the risk/return trade-off.
- Higher levels of return are typically associated with higher levels of risk. By investing in a portfolio of efficiently diversified financial assets, the Trust is able to achieve returns over the long term that are in excess of the return on cash.
- Markets are highly competitive but not always perfectly efficient. Therefore, the identification and subsequent selection of active managers with genuine skill, while challenging, can add value. Opportunities to add value through active management are not uniformly distributed across asset classes or through time.
- Returns can be enhanced through investing in illiquid assets, but such investments must be considered in light of the associated risks and challenges which may include high fees, irregular valuations, sub-optimal asset allocation and more intensive governance.
- The Trust has a responsibility to consider, in the context of its investment decisions, the negative and positive effects on society and the natural environment of decisions made by the companies, institutions and governments in which it invests.
- The integration of environmental, social and governance factors into investment decision-making helps to identify opportunities and risks, resulting in better financial outcomes. The Trustees also recognise the increasing impact of climate change as an investment risk and an investment opportunity.

4. Investment strategy

The Trustees are responsible for the asset allocation strategy decision which is made after considering the advice of the Trust's implemented consultant.

Asset classes

The Fund comprises, in varying proportions, the following asset classes:

- New Zealand equities
- International equities
- New Zealand fixed interest
- International fixed interest
- New Zealand cash

The Trustees will review the suitability of the above asset classes from time to time.

Asset class benchmarks

The Board, with advice from the Investment Committee, has adopted the following benchmarks for the asset classes detailed:

ASSET CLASS	BENCHMARK
New Zealand equities	S&P/NZX 50 (TR)
International equities	MSCI ACWI (NR) – 50% NZD hedged
New Zealand fixed interest	Bloomberg NZBond Composite 0+ Yr Index (TR)
International fixed interest	Bloomberg Global Aggregate Bond Index (TR) – NZD hedged
New Zealand cash	S&P/NZX Bank Bills 90-Day

Strategic asset allocation

The current strategic asset allocation is set out in the table below and was agreed by the Trustees in August 2020.

ASSET CLASS	WEIGHT	RANGES
New Zealand equities	7%	+/- 2%
International equities	38%	+/- 4%
Total Growth Assets	45%	+/- 3%
New Zealand fixed interest	9%	+/- 2%
International fixed interest	43%	+/- 3%
New Zealand cash	3%	+/- 3%
Total Income Assets	55%	+/- 3%

Based on the most recent capital market assumptions provided by the implemented consultant, the Fund is expected to provide a return, after investment and operating expenses, that is 3.4% p.a. in excess of inflation over the next 10 years, with the likelihood of a negative real return 1 year in every 3.

It is the Trustees' policy to review the strategic allocation at least every three years. If there is a significant change in the capital markets or in the circumstances of the Trust a more frequent review may be conducted. The next triennial investment strategy review is scheduled for 2023.

Rebalancing

It is recognised that, as a result of market movements and cash flows, the Fund's asset allocation will deviate from the strategic policy. The Board has agreed rebalancing ranges so that the strategic asset allocation will be broadly maintained but without incurring excessive transaction costs. The Implemented Consultant will review the Fund's asset allocation on a quarterly basis (or in the event of a significant market event, more frequently) and, in the event of a breach of these ranges, undertake the necessary transactions to bring the breached exposure(s) to approximately the policy weight(s). Prior to any rebalancing transaction, the implemented consultant will liaise with the Trust, ensuring that any transaction is coordinated with expected redemptions.

Redemptions made from the Fund to finance the Trust's normal operating activities will be used by the implemented consultant to minimise, to the extent possible, the probability of breaches occurring.

Foreign currency

The Trustees have adopted a policy of fully hedging foreign currency exposures of offshore fixed interest and applying a 50% hedge ratio to global equity exposure. Foreign currency exposure is not actively managed at a strategic level. However, at an asset class level, both market movements and, where applicable, active positions taken by the underlying investment managers can result in currency exposures which vary from the strategic position.

Reserving

The Trust may change its investment strategy and/or granting depending on the outcomes relative to the inflation- adjusted capital, with a goal of avoiding falling significantly below the inflation-adjusted capital. A detailed Reserving policy is shown in Appendix 2.

Active management

A mix of active and passive management is used. Active management provides the expectation of a higher return but also results in higher management fees. In adopting an active approach, the Trustees have (where applicable) established minimum excess return and maximum tracking error expectations, as set out in Section 6, in order to:

- Justify the added expense of active management, and
- Preserve the broad characteristics of the chosen asset class benchmarks and, in turn, the integrity of the strategic asset allocation process.

Responsible Investment

The Trustees expect any appointed Fund Manager to avoid investing in any company whose activities would be deemed to be unlawful under New Zealand law, notwithstanding that the investment might be domiciled in another country. The Trust therefore would not expect to be invested in companies that are directly or indirectly involved in the following activities:

- produce components that are key and dedicated to the production of anti-personnel mines and/or cluster munitions;
- are involved, either directly or indirectly, in the production of the core nuclear weapon system, or components/services of the core nuclear weapon system, that are considered tailor-made and essential for the lethal use of the weapon.

Whilst not considered unlawful the Trust would generally not expect to be invested in companies that are directly or indirectly involved in the following activities:

- the manufacture of tobacco.

The Trust would expect to be divested of any securities within 30 business days upon the Fund Managers becoming aware that a security should be excluded based on the criteria described above.

The Trust holds investments through pooled funds and therefore recognises it will have little or no influence over the structure of the product or securities held in the funds. However, in an attempt to influence the ESG consideration of the Fund Managers with which it invests the Trustees have shared the Trust's Responsible Investment Policy with those managers.

The Trustees shall:

- Advise their Consultant of this policy;
- Require their Consultant to acknowledge, as part of its mandate from the Trust, that they will take this policy into account when providing investment research, analysis and advice to the Trust and in the choosing of the Trust's Fund Managers;
- Require their Consultant to seek to employ Fund Managers who incorporate ESG into their company analysis and who actively engage with companies on ESG issues;
- Require the Consultant to report regularly to the Trust on how the Fund Managers are addressing environmental, social and governance issues as part of their activities, with reference to the UNGCP and the UNPRI.
- Require the Consultant to advise the Trust if they become aware of any actions by the Fund Managers that may result in a breach in relation to this policy.
- If there is a breach of the PDS, the Trust will require the Consultant to report the breach to the trustees as part of their monthly compliance reporting or as soon as is practicable. The Consultant will also report the following information to the trustees as soon as we are able to do so:
 - Details of the Fund where the breach has occurred
 - The nature of the breach and organisations involved
 - The timeline involved (when breach occurred, when and how it was discovered, when it was rectified)
 - The amounts involved (holding, income and profit/loss experienced by the Trust)
 - What enhancements, if any, have been or will be made to processes as a result of the breach.
 - The CE will report any breaches notified to the Board Chair or the Chair of AR&FC and jointly they will decide on a course of action with reference to the circumstances presented.

Appendices 3 and 4 discuss the UN Global Compact Principles and the UN Principles for Responsible Investment.

5. Risk

The Trustees regard 'risk' as the likelihood that the Trust fails to achieve the objectives set out in Section 4 above. To mitigate this risk, the Trustees have adopted a series of strategies to manage investment and related risks. The strategies include, apart from those in Section 4:

- Retaining an appropriately resourced and qualified implemented consultant for:
 - Strategic investment advice, and
 - Fund implementation, incorporating:
 - Investment manager selection
 - Operational due diligence of investment managers
 - Rebalancing transactions as required in accordance with the Trust's rebalancing policy
- Prohibiting leverage of the Trust's assets;
- Maintaining adequate reserves;
- Periodically reviewing the Trust's investment objectives;
- Regularly reviewing investment performance.

6. Performance measurement, review & reporting

The Trust's consultant measures the returns of the Trust and provides the Trustees with monthly summary reporting and quarterly comprehensive reporting.

The returns of the Trust's assets are monitored by the Trustees and compared with that of the strategic asset allocation specified in Section 4 above.

The performance of each of the Trust's managers will be monitored on a quarterly basis against an appropriate benchmark. The Trustees understand that, in the short term, the Fund may under-perform the benchmark. A greater emphasis will be placed on the longer-term (at least three years) performance of the Fund.

The Fund's investment returns should be considered at a total portfolio and at individual asset class level relative to the agreed outperformance and tracking error targets over a rolling three-year period.

The performance targets for each asset class are as follows:

ASSET CLASS	PERFORMANCE TARGET (BEFORE FEES)	TRACKING ERROR
New Zealand equities	1% p.a. above index	2.5-3% p.a.
International equities*	2% p.a. above index	3-5% p.a.
New Zealand fixed interest	0.5% p.a. above index	1-2% p.a.
International fixed interest	1% p.a. above index	1.75% p.a.
New Zealand cash	Above index	n/a

**applies to active fund only*

Implemented consultant

The Trustees retain an implemented consultant, which is currently Russell Investments. The services provided by the implemented consultant under the Implemented Consulting Agreement dated 14 March 2017, updated September 2020 include implementation services in relation to investing and rebalancing the Fund and advisory services.

The Trustees shall assess the performance of the implemented consultant on an annual basis and also undertake a formal review once every three years or sooner should circumstances deem it necessary. Such assessments will also compare the investment performance of the portfolio for which the implemented consultant has delegated authority against agreed-upon risk and return objectives. The qualitative and quantitative measures against which the implemented consultant will be assessed are detailed in the Appendix 1.

7. Appendices

APPENDIX 1: Measures for assessing the Implemented Consultant

Key qualitative measures by which the Trust will assess the Implemented Consultant:

- a) Attendance and contribution to regular meetings, including timely supply of materials prior to, and engagement with material during, meetings.
- b) Responsiveness to ad hoc queries.
- c) Maintaining the portfolio in accordance with all aspects of the SIPO, including efficient implementation of rebalancing trades and timely implementation of redemption trades as requested by the Trust.
- d) Quality of general investment consulting advice and recommendations to the Trust in relation to:
 - its Statement of Investment Policy and Objectives;
 - its strategic asset allocation; and
 - its Income Reserving Policy and its Granting Policy.
- e) Provision of reporting in line with agreed time frames.
- f) Relevance and quality of general education and training on investment matters.
- g) Proactive provision to the Trust of new information relevant to its investment programme, including but not limited to such things as new products, strategies or implementation efficiencies.

The key quantitative measure by which the Trust will assess the Implemented Consultant is outperformance of the relevant index of 0.90 per cent per annum over rolling 3-year periods.

APPENDIX 2: Reserving and grants policy

The reserving policy is a key risk management tool to aid the fulfilment of the Trust’s objectives.

For this purpose, the value of independently managed funds plus self-managed funds less all approved but unpaid amounts to grantees or for special initiatives (“Available Funds”) is determined monthly. Its adequacy to pay for grants and expenses can then be measured.

Adequacy is determined with reference to the reserving bands within which the value of Available Funds falls.

Reserving bands shall be as follows:

- Band 1 The Fund has sufficient reserves to ensure continuation of safety of capital.
- Band 2 The Fund has a normal level of reserves.
- Band 3 The Fund has insufficient reserves.
- Band 4 The Fund has fallen below the level of the inflation-adjusted amount of the original capital.

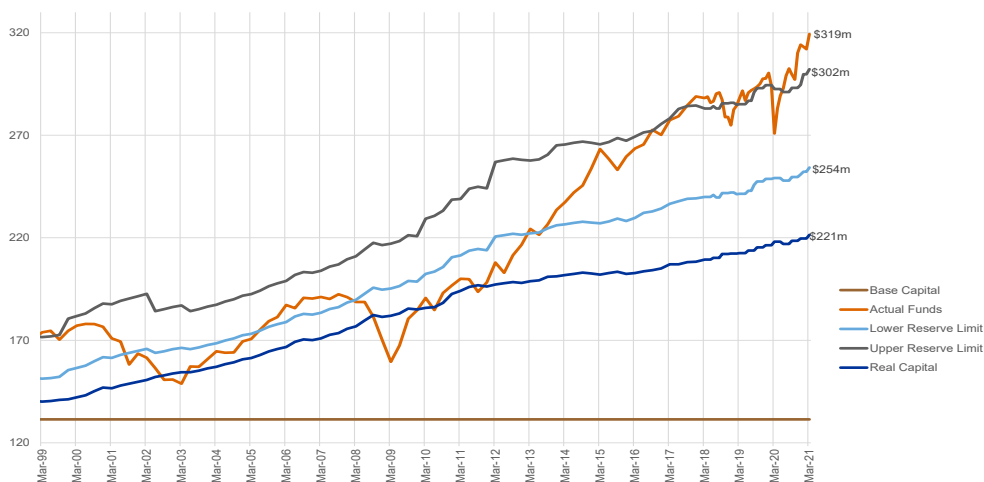
While the value of Available Funds remains within Band 2, normal grants may continue. Where the value moves to Band 1, 3 or 4 action may be required by Trustees including, adjustment of the level of grants or review of asset allocations. Either or both of these options would be designed to restore Available Funds to within Band 2.

The level of the reserving bands referred to above will be determined by the Board from time to time having regard to the Fund’s risk and return characteristics. Based on the adopted strategic asset allocation (see Section 6) and current economic assumptions:

- The lower bound of Band 2 equals the value of the original capital plus inflation (as measured by the CPI) plus a factor determined such that the probability (assuming that returns are normally distributed) of falling from this level to real capital in one year's time is approximately 1 in 50.
- The upper bound of Band 2 equals the value of the original capital plus inflation (as measured by the CPI) plus a factor determined such that the probability of falling from this level to the lower bound of Band 2 in one year's time is approximately 1 in 150.

For accounting purposes a capital maintenance reserve is established and maintained which preserves the real value of the initial capital allowing for inflation as measured by the Consumers Price Index (CPI). The total amount of capital and capital maintenance reserve when deflated by the CPI will equal the original capital.

An example of the Reserving chart is shown below:



APPENDIX 3: United Nations Global Compact Principles

The UN Global Compact asks companies to embrace, support and enact, within their sphere of influence, a set of core values in the areas of human rights, labour standards, the environment and anti-corruption.

Human Rights

Principle 1 Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2 Make sure they are not complicit in human rights abuses.

Labour

Principle 3 Businesses should uphold the freedom of association and the effective recognitions of the right to collective bargaining;

Principle 4 The elimination of all forms of forced and compulsory labour;

Principle 5 The effective abolition of child labour; and

Principle 6 The elimination of discrimination in respect of employment and occupation.

Environment

Principle 7 Business should support a precautionary approach to environmental challenges;

Principle 8 Undertake to promote greater environmental responsibility; and

Principle 9 Encourage development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10 Businesses should work against all forms of corruption, including extortion and bribery.

APPENDIX 4: Principles for Responsible Investment

As institutional investors, we have a duty to act in the best long-term interests of our beneficiaries. In this fiduciary role, we believe that environmental, social, and corporate governance (ESG) issues can affect the performance of investment portfolios (to varying degrees across companies, sectors, regions, asset classes and through time).

We also recognise that applying these Principles may better align investors with broader objectives of society. Therefore, where consistent with our fiduciary responsibilities, we commit to the following:

- Principle 1 We will incorporate ESG issues into investment analysis and decision-making processes.
- Principle 2 We will be active owners and incorporate ESG issues into our ownership policies and practices.
- Principle 3 We will seek appropriate disclosure on ESG issues by the entities in which we invest.
- Principle 4 We will promote acceptance and implementation of the Principles within the investment industry.
- Principle 5 We will work together to enhance our effectiveness in implementing the Principles.
- Principle 6 We will each report on our activities and progress towards implementing the Principles.

The Principles for Responsible Investment were developed by an international group of institutional investors reflecting the increasing relevance of environmental, social and corporate governance issues to investment practices. The process was convened by the United Nations Secretary-General.

In signing the Principles, we as investors publicly commit to adopt and implement them, where consistent with our fiduciary responsibilities. We also commit to evaluate the effectiveness and improve the content of the Principles over time. We believe this will improve our ability to meet commitments to beneficiaries as well as better align our investment activities with the broader interests of society.

We encourage other investors to adopt the Principles.