

New Zealand Fire Service Superannuation Scheme

Statement of Investment Policy and Objectives

Adopted on 14 June 2018

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1. Introduction

Purpose

The purpose of this Statement of Investment Policy and Objectives (SIPO) is to provide all parties involved in the investment management of the New Zealand Fire Service Superannuation Scheme (the Scheme) with guidance on how the assets of the Scheme are to be managed. It sets out the investment governance and management framework, philosophy, strategies and expectations of the Scheme in accordance with the requirements of the Financial Markets Conduct Act 2013 (the FMCA).

The SIPO is structured as follows:

- introduction,
- governance,
- investment beliefs,
- investment strategy, including strategic asset allocation,
- investment expectations,
- implementation,
- risk management, and
- review procedures.

A summary of the approach to asset class management and performance benchmarks is set out in appendix 1.

Description

The Scheme commenced on 2 December 1987.

The Scheme is registered under the FMCA as a restricted employer-related and workplace savings scheme and its supervisor is the Financial Markets Authority (the FMA). It is a complying superannuation fund, which allows the Trustee to accept certain contributions under the same rules as would apply to a KiwiSaver scheme.

The Scheme is defined contribution in nature and currently offers four Member Investment Choice options – Cash, Conservative, Balanced and Growth. The options are designed to deliver a range of investment outcomes, recognising that individuals have different needs and risk tolerances.

The Trustee applies investment earnings to each member's accounts in accordance with its earning rates policy.

The current Trustee is FireSuper Trustee Limited. The Trustee's board of directors comprises three directors appointed by the New Zealand Fire Service Commission, three directors appointed by the New Zealand Professional Firefighters Union Incorporated and one independent director selected by the other directors.

Effective date

This SIPO is adopted by the Trustee with effect from 14 June 2018 and remains effective until the next review date.

2. Governance

The Trustee's powers and discretions are defined in the Scheme's Trust Deed. In particular, the Trustee has responsibility for those functions and duties of a manager under the FMCA and for acting in a manner consistent with the Trustee Act 1956.

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 Scheme's assets are outlined below.

2.1 Trustee

- Governance
 - (i) Appointing and regularly reviewing all external parties identified in this SIPO, including an ongoing review of their responsibilities;
 - (ii) Reviewing this SIPO on a regular basis; and
 - (iii) Satisfying the reporting requirements under the FMCA.
- Investments
 - (i) Setting and periodically reviewing the Scheme's investment beliefs (philosophy);
 - (ii) Determining and periodically reviewing the strategic asset allocation for each Member Investment Choice option, having regard to the levels of risk that the Trustee considers to be appropriate;
 - (iii) Setting and periodically reviewing the Scheme's foreign currency strategy;
 - (iv) Determining and periodically reviewing the fundamental strategy (such as active or passive management) to be used for each asset class;
 - (v) Establishing and periodically reviewing the risk management policies (including the rebalancing policy/ranges), and the review and monitoring procedures;
 - (vi) Establishing criteria for the measurement of the performance of the Scheme's assets;
 - (vii) Selecting fund managers and, where applicable, determining how the monies within an asset class are to be distributed between the various fund managers;
 - (viii) Regularly reviewing the investment objectives and constraints adopted by the fund managers of the Scheme;
 - (ix) Regularly monitoring the investment results to determine whether the fund managers have performed satisfactorily relative to their objectives;
 - (x) Performing such audits of the processes and controls of any of the fund managers appointed as it feels is necessary for the Trustee to obtain assurance that the Scheme's assets are being managed appropriately;
 - (xi) Advising all or any of the fund managers of the Scheme of any material changes to either or both the design and operation of the Scheme which could affect their role; and
 - (xii) Establishing and regularly reviewing a workplan addressing the key decisions underlying the investment of the Scheme's assets.
- Other
 - (i) Establishing and regularly reviewing the earning rates policy of the Scheme.

2.2 Scheme secretary

- (i) Communicating the Trustee's decisions to the relevant parties and following up to ensure action items are completed;
- (ii) Acting as a conduit for communication from external parties to the Trustee;
- (iii) Collating the monthly compliance certificates from the investment consultant and fund managers, and reporting on the same to the Trustee; and
- (iv) Collating and filing the reporting required under the FMCA.

The current scheme secretary is Mercer (N.Z.) Limited.

2.3 Investment consultant

■ Governance

- (i) Participating with the Trustee in the regular review of this Statement of Investment Policy and Objectives; and
- (ii) Assisting the Trustee with its reporting requirements under the FMCA.

■ Investments

- (i) Advising the Trustee on all matters contained in the 'Investments' section of clause 2.1 above;
- (ii) Providing the Trustee with monthly and quarterly reports relating to the Scheme's investment performance. The quarterly reports shall include assessment of: the performance of the Scheme overall, the Member Investment Choices options offered, and individual fund managers against the agreed performance measurement criteria;
- (iii) Advising the Trustee of any market developments or best practice changes that may affect the way that the Scheme's assets are or should reasonably be invested; and
- (iv) Providing the Trustee with advice on other relevant investment issues.

■ Other

- (i) Undertaking procedures with respect to the monthly interim and annual declared earning rates as detailed in the Scheme's earning rates policy;
- (ii) On a monthly basis, determining if any trades are required to maintain the Member Investment Choice options within their rebalancing ranges and instructing the Scheme's administrator accordingly; and
- (iii) Furnishing monthly compliance certificates in respect of the Scheme's rebalancing ranges.

The current investment consultant is Russell Investment Group Limited.

2.4 Fund managers

- (i) Selecting securities (or sub-managers in the case of multi-manager products), subject to the constraints and guidelines advised in the applicable offer documents;
- (ii) Advising the Trustee of any variations that may arise relating to the operation of their products;

- (iii) Producing investment reports in advance of regular meetings and, at the Trustee's request, participating in those meetings. The reports shall contain such information and be in such format as agreed with the Trustee; and
- (iv) Furnishing monthly mandate compliance certificates.

The current fund managers are shown in appendix 1.

3. Investment beliefs

Underpinning both the Scheme's general investment objectives and the specific investment strategies employed are the Trustee's investment beliefs. These investment beliefs represent a set of propositions that, while they cannot be proven, reflect current investment theory and literature, empirical evidence, investment experience and personal judgment.

Governance

A robust governance structure that utilises suitably qualified resources with clear accountabilities will improve the Scheme's effectiveness in managing risk and ultimately providing value to members. The Trustee's role is strategic in nature and entails oversight of the management of the Scheme's investments. Given the present size and characteristics of the Scheme, the Trustee considers that a fully outsourced model is currently the most appropriate approach.

Investment strategy

In setting the investment strategy, the Scheme's broad membership characteristics and the fact that individuals have different needs, risk tolerances and levels of understanding in financial matters need to be considered. Accordingly, a number of distinctive portfolios, including a suitable default option, should be offered.

Asset allocation

Asset allocation is the key determinant of investment outcomes. A strategic approach, using both quantitative analysis and qualitative judgment, should be adopted.

Market efficiency

Market timing is not a reliable way of investing, as, in the short term, returns are generally unpredictable. However, at times, markets may become so far removed from equilibrium value that tilting away from the strategic position could be considered. Nonetheless, such deviations must be reasonably constrained.

Risk

Investors are generally compensated for accepting risk by realising higher returns over time. Consideration of risk should include the probability of real, rather than nominal, loss.

Diversification

Diversification should improve the risk/return relationship at both the total portfolio and asset class levels. However, diversification has a diminishing marginal impact and, in considering the Scheme's strategic mix, the cost/benefit trade-off associated with adding additional asset classes and/or managers needs to be considered. The benefits of diversification are not stable over time.

Active management

Although investment markets are highly competitive, securities are not always priced efficiently and active management can therefore generate excess returns. However, value added will fluctuate as opportunities are unlikely to be uniformly distributed through time or across asset classes.

Suitable active managers can be identified through focused analysis by specialist researchers.

Liquidity

A portfolio's risk/return characteristics can be enhanced through investing in illiquid assets, although these benefits can be time-dependent. However, illiquidity can give rise to unique risks and challenges, including inequity between investors, sub-optimal asset allocation and, in the extreme, an inability to meet obligations.

Currency

Currency can have a significant impact on a portfolio's risk/return characteristics. Currency hedging is a strategic decision that should take account of the Scheme's underlying investment objectives.

Execution

Costs (including fees, taxes, transaction expenses and implementation delays) can contribute to return leakage.

4. Investment strategy

The Trustee sets the investment strategy based on the investment beliefs set down in section 3 and its desire to offer a suitable range of risk/return options to members. The Trustee takes advice from the investment consultant in so doing. The fundamental investment strategy is expressed as a strategic asset allocation (SAA) for each Member Investment Choice option. For the avoidance of doubt, strategic asset allocation is the equivalent of the term 'target asset allocation' as used in the product disclosure statement.

4.1 Asset classes

The SAAs of the Member Investment Choice options currently comprise, in varying proportions, the following asset classes:

- Australasian equities
- International equities
- International listed property
- International listed infrastructure
- NZ private equity
- NZ fixed interest
- International fixed interest
- NZ cash and cash equivalents

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

4.2 Asset class benchmarks

The Trustee has adopted the asset class benchmarks set out in appendix 1.

4.3 Strategic asset allocation

The following SAAs apply to the Member Investment Choice options offered to members under the Scheme. These exclude any operational cash held by the Scheme's administrator.

Asset class	Cash %	Conservative %	Balanced %	Growth %
Australasian equities	-	5	11	15
Intl. equities (see note 1)	-	15	35	52.5
Intl. listed property	-	-	5	7.5
Intl. listed infrastructure	-	-	7.5	10
NZ private equity	-	-	See note 2	-
Total growth assets	-	20	58.5	85
NZ fixed interest	-	9	8	2.5
Intl. fixed interest	-	36	31	10
NZ cash and equivalents	100	35	2.5	2.5
Total income assets	100	80	41.5	15

Note 1: Encompasses target exposures of 90% to developed markets and 10% to emerging markets.

Note 2: The Trustee has made a commitment to private equity of up to \$5m.

4.4 Foreign currency strategy

For each diversified Member Investment Choice option, the target foreign currency exposure is equal to approximately 50% of the international equities exposure. Foreign currency exposure is not actively managed at a strategic level. However, at an asset class and sub-asset class level, both market movements and, where applicable, active positions taken by the underlying fund managers can result in deviations away from the target level. The resultant foreign currency exposure would normally be expected to sit within a range of 40-60% of the international equities exposure.

4.5 Taxation

In determining the SAAs of the Member Investment Choice options, the following tax treatment has been assumed:

- Australasian equities: taxed on dividends only after allowance for imputation credits
- International equities, international listed property, international listed infrastructure (including the associated currency hedging contracts): taxed under the fair dividend rate regime
- All other investments including currency hedging contracts (other than in respect of the international listed infrastructure): taxed on a comparative value basis

5. Investment expectations

Based on the underlying asset allocation of each Member Investment Choice option, the Trustee currently has the following investment expectations:

- **Cash option:** As a guide to members, the Cash option is constructed with a focus on there being negligible risk of a member incurring a loss in any year. The option is expected to provide a return after tax and investment expenses broadly in line with the after-tax movement of the S&P/NZX Bank Bills 90-Day Index.
- **Conservative option:** As a guide to members, the Conservative option is constructed with a focus on there being a reasonably small risk (approximately 1 in 100 years) of a member losing more than 7.5% after inflation in any year, with a likelihood of a negative return of (currently) 1 year in every 5. The option is expected to provide a long-term (10 years plus) return after tax and investment expenses of approximately 1-1.5% above inflation.
- **Balanced option:** As a guide to members, the Balanced option is constructed with an expectation of providing a long-term (10 years plus) return after tax and investment expenses of approximately 2-2.5% p.a. above inflation. There is a reasonably small risk (approximately 1 in 100 years) of a member losing more than 20% after inflation in any year, with a likelihood of a negative return of (currently) 1 year in every 3.
- **Growth option:** As a guide to members, the Growth option is constructed with an expectation of providing a long-term (10 years plus) return after tax and investment expenses of approximately 3-3.5% p.a. above inflation. There is a reasonably small risk (approximately 1 in 100 years) of a member losing more than 30% after inflation in any year, with a likelihood of a negative return of (currently) 1 year in every 3.

The quantitative analysis of the investment consultant is used as a basis for setting and reviewing these investment expectations on a regular basis. However, given that returns ultimately cannot be forecast with any precision, and can themselves be volatile, the Trustee will also use its judgement in assessing whether a revision of either the investment strategy and/or these investment expectations is necessary.

Members are able to tailor their own risk/return profile through investing in more than one Member Investment Choice option.

6. Implementation

This section sets out general principles for implementing the Scheme's investment strategy.

Internal versus outsourced management

The Trustee has outsourced the investment of the Scheme's assets to external fund managers.

Active versus passive asset class management

Active management (as opposed to passive management) is pursued in all asset classes.

In adopting an active approach to asset class management, the Trustee has (where applicable) established minimum excess return and maximum tracking error expectations, as set out in appendix 1, 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.

These expectations serve as a guide in assessing, *ex ante*, a fund manager's proposed management of an asset class.

Responsible investment

To the extent feasible, the Scheme will not invest in any company involved materially in activities that are contrary to New Zealand law. However, the directors have determined that investing through commingled funds offered by professional managers is the most practicable and efficient way of delivering desired outcomes to members. Accordingly, the directors have no direct influence over the individual securities held, or the responsible investment policies, voting decisions and engagement activities of the investment managers. Nonetheless, the directors will regularly question the investment managers in this regard and on their general approach to incorporating responsible investment practices into their processes.

7. Risk management

Rebalancing

Asset allocations will drift over time as a result of differences in asset class returns and cashflows, while rebalancing incurs transaction costs. Defining rebalancing ranges within which actual asset allocations must be maintained is therefore a trade-off between these factors. The following rebalancing ranges apply to the diversified Member Investment Choice options:

	Conservative %	Balanced %	Growth %
Australasian equities	±2.5	±2.5	±2.5
Intl. equities	±2.5	±5	±5
Intl. listed property	-	±2.5	±2.5
Intl. listed infrastructure	-	±2.5	±2.5
NZ private equity	-	<\$5m	-
Total growth assets	± 2.5	± 5	± 5
NZ fixed interest	±2.5	±2.5	±2.5
Intl. fixed interest	±5	±5	±2.5
NZ cash and equivalents	±5	±2.5	±2.5
Total income assets	± 2.5	± 5	± 5

For each diversified Member Investment Choice option, the actual asset allocation will be compared to the SAA on a monthly basis. In the event that one or more of the exposures fall outside of the rebalancing ranges, the necessary transactions will be determined to bring the breached exposure(s) to approximately the mid-point between the rebalancing range limit and the SAA.

A breach of a rebalancing range resulting from market movements, which is corrected as soon as is practicable, will not be deemed to be material for the purposes of the limit break reporting requirements under the FMCA.

Gearing

The Scheme does not borrow at a total portfolio level. Gearing may, however, apply within the underlying investments.

Lending and credit

The assets of the Scheme are not to be used for the purposes of lending nor for backing the credit position of other parties.

Derivatives

Derivative contracts may only be employed by the fund managers:

- as a hedge to manage exposure to foreign currency or other investment risks; and
- to reduce transaction costs and improve liquidity in taking a position which would otherwise have been taken by buying or selling physical securities.

Diversification

An appropriate level of diversification across securities, sectors, asset classes and countries will be maintained.

Liquidity

Liquidity will be considered and maintained at an appropriate level.

Prohibited investments

Management of the Scheme's assets is through a series of pooled products offered by the fund managers. In approving the various products, it is recognised that the Trustee has no direct control of the underlying investment mandates.

8. Review and monitoring procedures

8.1 SIPO

The SIPO will be reviewed no less frequently than annually, or sooner if appropriate due to events including but not limited to material changes in: the SAAs, relevant Government policy, the Scheme's governance model, the parties included in this SIPO, or market conditions.

Any changes to the SIPO must be approved via resolution by the Trustee.

The most current version of the SIPO is available on the Disclose Register (<http://www.business.govt.nz/disclose>).

8.2 Investment strategy

The SAAs are to be reviewed, in principle, every three years, or more frequently if there are significant changes to the economic and commercial environment, or as the Trustee sees fit.

Any changes to the SAAs must be approved via resolution by the Trustee.

Other elements of asset class strategy, such as the use of active or passive approaches to asset management, will be reviewed periodically.

8.3 External parties

The Trustee will monitor and review on a regular basis the performance of the following external parties:

(i) Investment consultant

The efficacy of the advice provided by the investment consultant will be regularly assessed.

(ii) Fund managers

The Trustee's excess return and tracking error expectations and, unless otherwise agreed between the parties, the benchmarks adopted by the Trustee will serve as a guide in assessing each fund manager's rolling 3-year performance.

The performance of each fund manager will also be regularly assessed on a peer-relative basis.

8.4 Performance report

The investment consultant will prepare a performance report for the attention of the Trustee and discussion at a meeting shortly after each financial quarter-end. This report will consolidate asset values and performance at both asset class and total portfolio levels for each Member Investment Choice option.

Investment returns should be considered net of taxes and expenses. Expenses can be direct or indirect and include fees, implementation delays, transaction costs, commissions and market impact costs.

Appendix 1 – Asset class management and performance benchmarks

Asset class	Approach	Benchmark	Min. excess return exp. % p.a.	Max. tracking error exp. % p.a.	Fund
Australasian equities	Active, multi-manager ¹	S&P/NZX 50	1	5	AMP Capital NZ Shares Fund ² ; Harbour Australasian Equity Fund WUT ³
Intl. equities	Active, multi-manager	MSCI World*/MSCI Emerging Markets (weighted as per section 4.3)	1	5	AMP Capital Core Global Shares Fund ² ; AMP Capital Core Hedged Global Shares Fund ² ; AMP Capital Emerging Markets Shares Fund ²
Intl. listed property	Active, single-manager	FTSE EPRA/NAREIT Developed Rental*	1	5	ANZ Investments Wholesale International Property Securities Fund ⁴
Intl. listed infrastructure	Active, single-manager	S&P Global Infrastructure*	1	5	First State Investments Global Listed Infrastructure Fund ⁵
NZ private equity	Active, single-manager	n/a	n/a	n/a	Direct Capital IV ⁶
NZ fixed interest	Active, single-manager	S&P/NZX NZ Government Stock	0.5	2.5	ANZ Investments Sovereign Bond Fund ⁴ ; ANZ Investments High Grade Bond Fund ⁴
Intl. fixed interest	Active, multi-manager	Bloomberg Barclays Global Aggregate*	0.5	2.5	Russell Investments Global Fixed Interest Fund ⁷
NZ cash and equivalents	Active, single-manager	S&P/NZX Bank Bills 90-Day	-	0.5	ANZ Investments Wholesale Cash Fund ⁴

* Indices are in \$NZ hedged terms consistent with the Trustee's strategy, as set out in section 4.4, which targets a foreign currency exposure of approximately 50%, with a typical range of 40-60%, of the international equities exposure.

¹ The policy weights are 50% to each fund. There are no operational ranges.

² Issued by AMP Capital Investors (New Zealand) Limited. For international equities, the respective policy weights and operational ranges are: 35%, 25-45%; 55%, 50-60%; and 10%, 5-15%. Positions are rebalanced should the operational ranges be breached.

³ Issued by Harbour Asset Management Limited

⁴ Issued by ANZ New Zealand Investments Limited. For NZ fixed interest, the respective policy weights and tactical ranges are: 40%, 20-60%; and 60%, 40-80%.

⁵ Issued by First State Investments (NZ) Limited

⁶ Issued by Direct Capital Limited

⁷ Issued by Implemented Investment Solutions Limited