



Statement of Investment Policy and Objectives (SIPO)

8 July 2019



Simplicity

The nonprofit KiwiSaver plan

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Simplicity's Governing Principles

- Providing our investors with dignity in retirement
- Offering New Zealanders high quality, low cost financial products.
- Giving profits back to members.
- Being socially responsible.

Description of the Scheme

The Simplicity KiwiSaver Scheme (**Scheme**) is a KiwiSaver Scheme offering four investment options – the Guaranteed Income Fund, the Conservative Fund, the Balanced Fund and the Growth Fund (**the Funds**). The Funds are designed to deliver a range of investment outcomes, recognising that individuals have different needs and risk tolerances.

Simplicity NZ Limited (**Simplicity, we, us, our**) is the manager of the Scheme.

We are a “not for profit” organisation. We donate 15% of our annual management fee (0.30% p.a.) to the Simplicity Charitable Trust, who chooses which charities receive the donations.

More details of how this works and the charities that benefit are on our website www.simplicity.kiwi.

The Supervisor of the Scheme is Public Trust, and MMC Limited is the Administrator of the Scheme.

Purpose and Philosophy

Each of the Funds has a strategic asset allocation to the major asset classes i.e. shares (including listed property) and fixed interest (bonds).

We believe that markets are efficient and so we have adopted a ‘passive’ index approach to investing. We do not actively pick or select securities, because we believe that using index funds and having very low costs will return investors more money over time.

Each asset class is represented by an index fund where possible. These funds are designed to track the investment return of a particular market index. For offshore investments, the scheme invests in funds managed by Vanguard Asset Management Limited (**Vanguard**), a subsidiary of the Vanguard Group, Inc.

Established in 1975, the Vanguard Group, Inc. is owned by its US-domiciled mutual funds, which are in turn owned by their investors. Based in Valley Forge, Pennsylvania, USA, as at 31 January 2019, it managed over NZ\$7.7 trillion of client funds worldwide.

If no suitable Vanguard index fund is available for a particular asset class (specifically New Zealand bonds and shares) we have established our own sector funds that hold a portfolio of securities, designed to provide the respective market return. Although these funds are not index funds, we invest as closely as practically possible to the market index, and minimise costs wherever practicable by keeping transaction and holding costs low.

By investing in index funds, we also maximise diversification, with over 2,000 different share and bond investments in each Fund.

Within its New Zealand shares allocation, the Growth Fund also has a limited investment in unlisted securities issued by New Zealand businesses with high growth potential. This investment is managed by Icehouse Ventures Limited (**Icehouse**); the investment arm of The Icehouse Limited that was formed in 2001 to assist small to medium sized enterprises grow their businesses.



We continually monitor each Fund's asset allocation and rebalance whenever a specified threshold is reached.

Each Fund invests in the same mix of funds, however the weightings to each sector will differ to reflect the risk versus return characteristics of the Fund e.g. the Growth Fund will target 78% in shares, while the Conservative Fund target is 22%.

The relationship between risk and return means that growth asset classes such as shares are likely to deliver higher returns over time but may be more volatile (prices falling as well as rising). Fixed interest securities such as government bonds are usually less volatile but are also likely to deliver a lower return over the long term.

Investment Objectives

The investment objective for each Fund is for its performance to be ranked in the top 25% of its respective KiwiSaver category after tax and fees over the medium to long term. For the Conservative Fund, its category is funds with an average allocation to income assets such as bonds, of around 80%. For the Growth Fund, its category is funds with an average of around 75% allocated to growth assets such as shares.

For the Guaranteed Income Fund and the Balanced Fund, their category is funds with a fairly even split between income and growth assets. The Guaranteed Income Fund and the Balanced Fund benchmark asset allocation is 44% income, 56% growth.

Investment Policies

Currency hedging

Our hedging policy is set using the average of the 12 main KiwiSaver providers that we monitor, resulting in our equity investments being 65% hedged into New Zealand dollars. The hedging policy will be monitored quarterly and adjusted from time to time to follow the average within a range 50% - 70%.

The foreign exchange exposures in each Fund are hedged as follows:

Asset class	Hedging style	Benchmark (%)	Range
International equities	Passive	(' 5 to) 5	' 5 to) 5
Australian equities	Passive	(' 5 to) 5	' 5 to) 5
International fixed interest	Passive	100	95 to 105

International markets are accessed through a series of index funds managed by Vanguard. In the case of the Australian Share Index Fund, we hedge 65% of the Australian dollar exposure into New Zealand dollars.

For the remaining international equities, 65% of the exposure is invested in a Vanguard fund that is fully hedged into New Zealand dollars and 35% into an unhedged Vanguard fund.

For international bonds, we invest in a Vanguard fund that is fully hedged into New Zealand dollars.

The hedging strategy is managed using forward exchange contracts with New Zealand registered banks. The current value of all outstanding foreign exchange contracts is constantly monitored by the Administrator and advised to us daily. Sufficient cash and liquid assets are retained in each Fund to cover the current value of the outstanding forward contracts at all times.



Rebalancing

The current asset allocation of the Funds will be monitored by us on a daily basis in consultation with the Administrator.

Where a Fund is within 2.0% of the maximum or minimum permitted range of exposure to an asset class (as detailed in Schedule 1, 2 and 3 respectively) or within 2.0% of the permitted total weighting to income or growth assets, we will determine the rebalancing amounts required and will rebalance the Fund accordingly. The exception is cash which may vary more than 2% from its target for liquidity management purposes.

In the event of significant financial market volatility, there is the possibility that the asset allocation of the Funds may breach the assigned range. Any such breach must be remedied within 5 working days. We provide a report to the Supervisor setting out all breaches that occur on a quarterly basis.

Tactical asset allocation Policy

We believe that markets are efficient and we have therefore adopted a passive investment approach. No attempt is made to increase returns by actively over-weighting or under-weighting particular asset classes at the expense of others.

Derivatives Policies

Apart from forward exchange contracts to hedge currencies, our preference is not to use derivatives and the nature of our investments means this is almost always the case. Derivatives are only used if there is no cost effective means to gain an essential investment exposure using physical securities. Where derivatives are used, they will be structured to achieve the same investment returns as if the investments were held physically (commonly referred to as 'One Delta' investments).

Leverage Policies

No leverage is permitted at the Fund level. Some of the underlying assets (such as equities) may operate with some leverage. The inclusion of these assets reflects our investment philosophy to mirror the index rather than to increase returns.

Diversification Requirements/Limits

Where possible, the Scheme invests into index funds managed by Vanguard that have a high level of diversification.

Where we manage a fund designed to generate a similar return to a particular market, the respective Investment Guidelines are drafted to ensure that concentration risk is prudently managed within that asset class.

Market Risk Management Policy

Market risk is an inevitable aspect of investing in financial markets. We believe that the strategic asset allocation of each investment option provides a diversified exposure to each asset class at an appropriate level for that options' label; Conservative, Guaranteed Income, Balanced or Growth.

While market risk varies for each of the funds, education and communication are key to understanding risk and/or being comfortable with it in the funds. We are committed to providing the information that investors need to understand how and why markets (hence their investments) are performing as they are.



Credit Risk Management

There will be a degree of credit risk in the New Zealand Cash, New Zealand Fixed Interest and International Fixed Interest portfolios in each of the investment options.

The New Zealand Cash portfolios of each Fund are designed to ensure that any credit risk is primarily to New Zealand registered banks, or securities with a credit rating equal to, or better than, the single A rated banks.

A high proportion of the New Zealand Fixed Interest portfolio will be in New Zealand government stock. Only highly rated investments are authorised investments.

The International Fixed Interest portfolio invests in a diversified portfolio of securities (bonds), containing approximately 750 securities (bonds) issued by governments, government related entities and companies with an investment grade rating (investment grade means an issue is rated at least BBB- or equivalent by a recognised rating agency such as Standard & Pooers). All securities are included in a recognised international index issued by Bloomberg Barclays. The weighted average credit rating is AA-.

Other Relevant Policies

Liquidity and Cash Flow Management

We maintain a balance of transactional cash on call in a specific bank account for each investment option. This is to ensure that there is sufficient liquidity to fund the normal course of business.

The Funds' targeted level of cash is 2% and we monitor this, in conjunction with the Administrator, on a daily basis. In all cases, the maximum cash balance before Funds must be invested in other asset classes is 10%.

A cash flow forecast is maintained with a 2 working day time horizon. This is considered sufficient time to redeem from underlying investments if required. Most authorised investments have a maximum settlement period of 2 working days. Similarly, 2 working days is sufficient to ensure that inflows are invested and the 10% maximum cash balance is not exceeded.

Conflicts of Interest Policy

Conflicts of Interest may occur at multiple levels and Scheme members' interests take priority at all times.

In order to avoid, mitigate and manage potential conflicts, we have adopted a Conflicts of Interest Policy. Our key principle is that any potential conflicts of interest are avoided where possible. If that is not possible, then they are clearly disclosed by any person making decisions on behalf of Scheme members and mitigated to the extent possible.

A register of potential conflicts of interest is maintained by the chair of our Board of Directors. The chair must be notified of any changes to the register if and when they occur. Continual disclosure of potential conflicts of interest is a contractual requirement for all members of staff or parties contracted to Simplicity.



Voting Policies

Where the exposure to an asset class is achieved through an index fund managed by Vanguard, the following voting policy applies:

<https://about.vanguard.com/vanguard-proxy-voting/voting-guidelines/>

Where the securities are held directly, we will vote by proxy where it is in the best interests of Scheme members to do so. Voting decisions are made on a case by case basis. We intend to actively vote in line with the principles of good corporate governance. We may decide not to vote.

Environmental, Social and Governance Policies

Our business is ultimately a social enterprise, thus investing responsibly is an important issue for us and our members. Although our investment policy means that the Funds may have an investment in any company whose securities are a constituent of the index our funds are following, the indices for the Vanguard international share fund and the Vanguard international bond fund that we use specifically exclude investments in companies with significant involvement in the following activities:

- Fossil fuels
- Alcohol
- Tobacco
- Gambling
- Military weapons
- Civilian firearms
- Nuclear power
- Adult entertainment

We exclude securities issued by companies involved in those activities from any investments we control directly, such as the New Zealand share investments. We are currently unable to screen these activities from our Vanguard Australian share fund.

We also focus on areas of social responsibility where we can have a constructive involvement e.g. donating 15% of our management fee to charities and being an activist shareholder in those New Zealand companies we invest in.

Pricing/Valuation Policies

The nature of the Scheme's authorised investments means there should always be a valuation at close of business in almost all cases. We have outsourced the pricing and valuation of the investments to the Administrator.

Where an investment is traded on financial markets, the Administrator will determine the valuation in accordance with the last market prices available at the valuation point. Where the investments are Vanguard unlisted trusts, the Administrator will be provided with a unit price each day by Vanguard.

The valuation of assets is generally based on information provided to the Administrator by independent third party providers. Where practicable the Administrator will look to verify this data by comparing information from a second independent source.



The Growth Fund's investment into unlisted securities will be valued once a month based on annual independent valuations. At least once every year, each investment will be valued by an independent registered valuer appointed by us. Additionally, the investments will be valued by Icehouse on a rolling quarterly basis so that there are valuations spread over the calendar year.

This annual independent valuation noted above will be based on information provided by Icehouse. The methodology for valuing each investment will take into account the business model provided by each business to Icehouse. It will also take into account available financial information relating to each investment.

We will also engage on a monthly basis with Icehouse to obtain information (either relating to a specific investment, the market sectors within which they operate, or a segment of the market generally) to enable us to assess whether there has been a material change that may impact on the valuation of an investment, that would in turn impact on the Fund's monthly valuation.

Taxation Policy

The Scheme is Portfolio Investment Entity (PIE). Tax on investment income is calculated at each member's prescribed investor rate (currently either 10.5%, 17.5% or 28% depending on each member's circumstances) and paid to the Inland Revenue on members' behalf annually.

Investment Performance Monitoring and Reporting

The performance of each asset class is monitored against its respective benchmark on a daily basis.

Performance is reported to the Supervisor monthly. Investors will receive a quarterly fund update, with current information available through the Scheme's website on a daily basis.



Investment Strategy and SIPO Review

Investment Strategy

We believe our return objectives will be achieved by maintaining a consistent asset allocation through market cycles. We do not believe in frequent re-balancing of asset allocations, which can cause unnecessary activity (and associated costs) and can be overly emotionally driven in times of market volatility. In our opinion this approach has not shown that it can add value to investors.

The asset allocation of each Fund is set by determining the average strategic asset allocation to each asset class by the main KiwiSaver providers for each risk category; conservative, balanced and growth. This data is released every quarter as part of each provider's regulatory disclosure.

While we use the averages as a basis for our asset allocation, we do not believe our investors need to hold the levels of liquidity that the average manager holds. We are a long term investor and believe we should collect the additional return from holding long term bonds. Our approach is therefore to allocate the average cash weighting over and above what is required for cashflow management (around 2%) into highly rated New Zealand corporate bonds.

Where the average allocations amongst our peers includes unlisted investments, or those not accessible via public markets (e.g. direct property, private equity, hedge funds), we will allocate the same amount into their listed equivalents i.e. shares or bonds. Liquidity and low costs of investing, are paramount to our investors' wellbeing.

The average strategic asset allocations are checked quarterly when the data is released.

SIPO Review

A review of this SIPO is undertaken by us at least annually, but we believe that investors are best served by maintaining a steady and consistent investment policy. This means that significant changes to our SIPO are unlikely to be required unless there are product changes or if there has been a significant market development that makes the existing SIPO redundant or impossible to implement.

If we decide a change is appropriate, it can only be made following prior consultation with the Supervisor.

The most current version of the SIPO is available on the Scheme's register, which is available at www.simplicity.kiwi or on the Disclose website at www.business.govt.nz/disclose.



Schedule 1: Investment strategy for the Conservative Fund

The Conservative Fund provides investors with a limited exposure to growth assets, but most of its investments are in income assets. As a result, the return from the Fund is likely to be lower over the longer term (10 years or more) than the Balanced or Growth Funds, but the value of its investments are unlikely to fluctuate as much as the Balanced or Growth Funds.

Where possible, the Fund's investments are in index funds, managed by Vanguard.

In the case of New Zealand assets (cash, fixed interest and equities), no suitable externally managed index fund is currently available at a reasonable investment management fee.

For New Zealand bonds and shares the Fund therefore invests in funds managed by us to provide the respective market return.

Benchmark Asset Allocations and Ranges

Asset class	Benchmark Asset Allocation	Range
Cash and cash equivalents	2%	0% – 10%
New Zealand fixed interest	36%	26% – 46%
International fixed interest	40%	30% – 50%
Total Income Assets	78%	68% – 88%
New Zealand equities	7%	0% – 17%
Australian equities	2.5%	0% – 12.5%
International equities	12.5%	2.5% – 22.5%
Total Growth Assets	22%	12% – 32%

Authorised investments

Authorised investments for each asset class are detailed in Schedule 5 on page 15.



Schedule 2: Investment strategy for the Balanced Fund

The Balanced Fund provides investors with an exposure to a mix of growth and income assets. As a result, the return from the Fund is likely to be lower over the longer term (10 years or more) than the Growth Fund but higher than the Conservative Fund. At the same time the value of its investments are likely to fluctuate more than the Conservative Fund but are likely to be more stable than the Growth Fund.

Where possible, the Fund's investments are in index funds, managed by Vanguard.

In the case of New Zealand assets (cash, fixed interest and equities), no suitable externally managed index fund is currently available at a reasonable investment management fee. For New Zealand bonds and shares the Fund therefore invests in funds managed by us to provide the respective market return.

Benchmark Asset Allocations and Ranges

Asset class	Benchmark Asset Allocation	Range
Cash and cash equivalents	2%	0% – 10%
New Zealand fixed interest	16.5%	6.5% – 26.5%
International fixed interest	25.5%	15.5% – 35.5%
Total Income Assets	44%	34% – 54%
New Zealand equities	15%	5% – 25%
Australian equities	6%	0% – 16%
International equities	35%	25% – 45%
Total Growth Assets	56%	46% – 66%

Authorised investments

Authorised investments for each asset class are detailed in Schedule 5 on page 15.



Schedule 3: Investment Strategy for the Growth Fund

The Growth Fund provides investors with a limited exposure to income assets, but most of its investments are in growth assets. As a result, the return from the Fund is likely to be higher over the longer term (10 years or more) than the Conservative and Balanced Funds, but the value of its investments are likely to fluctuate more than the Balanced and Conservative Funds.

Where possible, the Fund's investments are in index funds, managed by Vanguard.

In the case of New Zealand assets (cash, fixed interest and equities), no suitable externally managed index fund is currently available at a reasonable investment management fee.

For New Zealand bonds the Fund therefore invests in a fund managed by us to provide the respective market return.

For New Zealand shares the Fund primarily invests in a fund managed by us to provide the respective market return, but also has a limited allocation (maximum 5%) to unlisted New Zealand securities issued by New Zealand businesses with high growth potential.

Benchmark Asset Allocations and Ranges

Asset class	Benchmark Asset Allocation	Range
Cash and cash equivalents	2%	0% – 10%
New Zealand fixed interest	7.5%	0% – 17.5%
International fixed interest	12.5%	2.5% – 22.5%
Total Income Assets	22%	12% – 32%
New Zealand equities	21%	11% – 31%
Australian equities	8.5%	0% – 18.5%
International equities	48.5%	38.5% – 58.5%
Total Growth Assets	78%	68% – 88%

Authorised investments

Authorised investments for each asset class are detailed in Schedule 5 on page 15.



Schedule 4: Investment strategy for the Guaranteed Income Fund

The Guaranteed Income Fund provides investors with an exposure to a mix of growth and income assets. As a result, the return from the Fund is likely to be broadly in line with the Balanced Fund (over 10 years or more) and its investments are likely to fluctuate in a similar manner to the Balanced Fund. The Fund is designed to provide the basis of a long term income stream for its investors, alongside the insurance policy that guarantees the income stream for life.

Where possible, the Fund's investments are in index funds, managed by Vanguard.

In the case of New Zealand assets (cash, fixed interest and equities), no suitable externally managed index fund is currently available at a reasonable investment management fee. For New Zealand bonds and shares the Fund therefore invests in funds managed by us to provide the respective market return.

Benchmark Asset Allocations and Ranges

Asset class	Benchmark Asset Allocation	Range
Cash and cash equivalents	2%	0% – 10%
New Zealand fixed interest	16.5%	6.5% – 26.5%
International fixed interest	25.5%	15.5% – 35.5%
Total Income Assets	44%	34% – 54%
New Zealand equities	15%	5% – 25%
Australian equities	6%	0% – 16%
International equities	35%	25% – 45%
Total Growth Assets	56%	46% – 66%

Authorised investments

Authorised investments for each asset class are detailed in Schedule 5 on page 15.



Schedule 5: Asset Class Investment Guidelines

The investment guidelines and authorised investments for each Asset Class in the Funds is governed by the same restrictions:

Cash and Cash Equivalent Portfolio

Investment Policy

The Funds invest primarily in cash on call and liquid, investment grade fixed interest securities issued in New Zealand.

Investment Objective

The objective is to track the Reserve Bank New Zealand Official Cash Rate return on a rolling 12 month basis before tax and fees.

Benchmark Index

The Benchmark Index is the Reserve Bank New Zealand Official Cash Rate as published by the Reserve Bank New Zealand, or any replacement index with the agreement of the Supervisor.

Authorised Investments

Cash on call or any debt security or a Derivative thereof that is denominated in New Zealand dollars.

Manager shall ensure that the Cash portfolios of each Fund remain at all times within the following prudential limits:

Type of debt security	Maximum % with single issuer of debt security	Maximum % class of issuer of debt security
Cash on call at a registered New Zealand bank	100	100
New Zealand fixed interest	100	100
Debt securities issued or guaranteed by a New Zealand Registered Bank rated at least A+ (S&P rating or equivalent)	30	100
Debt securities issued by the New Zealand Local Government Funding Agency Limited	100	30
In addition to Bank securities, debt securities of at least AA- (S&P rating or equivalent)	10	50
Specific authorisations	as approved by the Supervisor	

The weighted average duration of the Cash and Cash Equivalent portfolios for each Fund must not exceed 60 days.



New Zealand Fixed Interest Portfolio

Investment Policy

The Funds invest in the Simplicity NZ Bond Fund (or its equivalent). The Simplicity NZ Bond Fund invests in New Zealand government bonds and other highly rated liquid bonds.

Investment Objective

To generate a return similar to the performance of the NZ government bond market.

Benchmark Index

The Benchmark is the Bloomberg NZBond Govt O+ Yr Index as calculated and published by Bloomberg, or any replacement index with the agreement of the Supervisor.

International Fixed Interest Portfolio

Investment Policy

The Funds invest in the Vanguard Ethically Conscious Global Aggregate Bond Index Fund (or its equivalent).

The Vanguard Ethically Conscious Global Aggregate Bond Index Fund (Hedged) invests in a diversified portfolio of securities (bonds) selected from an index containing approximately 18,700 securities (bonds) issued by governments, government-related entities, investment grade corporate issues and securitised assets from around the world.

Investment Objective

To track the Benchmark Index (defined below) return on a rolling 12 month basis before tax and fees.

Benchmark Index

The Benchmark is the Bloomberg Barclays MSCI Global Aggregate SRI ex ESG Exclusions Index 100% hedged into the New Zealand dollar.

Hedging Policy

Returns from the Vanguard Ethically Conscious Global Aggregate Bond Index Fund are fully hedged into New Zealand dollars by Vanguard.

New Zealand Equity Portfolio

Investment Policy

The Funds invest in the Simplicity NZ Share Fund (or its equivalent). The Simplicity NZ Share Fund invests in companies and property trusts listed on the New Zealand stock exchange (NZX). The Growth Fund also has a limited allocation (maximum 5%) to unlisted securities issued by New Zealand companies with high growth potential.

Investment Objective

To generate a return similar to the performance of the NZ share market.

Benchmark Index

The Benchmark is the S&P/NZX 50 Gross Index including imputation credits as calculated and published by the NZX, or any replacement index with the agreement of the Supervisor.



Australian Equity Portfolio

Investment Policy

The Funds invest in the Vanguard Australian Shares Index Fund. The Vanguard Australian Shares Index Fund invests in approximately 290-300 of the largest companies and property trusts listed on the Australian Securities Exchange (ASX).

Investment Objective

To track the Benchmark Index (defined below) return on a rolling 12 month basis before tax and fees.

Benchmark Index

The Benchmark is the S&P/ASX300 Index 65% hedged into the New Zealand dollar, or any replacement index with the agreement of the Supervisor

Hedging Policy

Returns from the Vanguard Australian Shares Index Fund are in Australian dollars. We implement forward exchange contracts to hedge 65% of the returns into New Zealand dollars.

International Equity Portfolio

Investment Policy

The Funds invest 65% in the Vanguard Ethically Conscious International Shares Index Fund - NZD Hedged and 35% in the Vanguard Ethically Conscious International Shares Index Fund which is unhedged. The Vanguard Ethically Conscious International Shares Index Funds provide investors with exposure to over 1,500 of the world's largest companies listed on the exchanges of the world's major developed economies.

Investment Objective

To track the Benchmark Index return (defined below) on a rolling 12 month basis before tax and fees.

Benchmark Index

The Benchmark Index is the FTSE Developed World ex Australia ex ESG Exclusions Index 65% hedged to the New Zealand dollar, or any replacement index with the agreement of the Supervisor.

Hedging Policy

Returns from the Vanguard Ethically Conscious International Shares Index Fund - NZD Hedged are fully hedged into New Zealand dollars by Vanguard. Returns from the Vanguard Ethically Conscious International Shares Index Fund are unhedged.

