

Statement of Investment Policy and Objectives

Local Government
Superannuation Scheme

SuperEasy KiwiSaver
Superannuation Scheme

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1. Introduction

1.1 Purpose

The purpose of this Statement of Investment Policy and Objectives (“the SIPO”) is to document the decisions the Trustee has made on the investment management of the Local Government Superannuation Scheme (“the LGSS”) and the SuperEasy KiwiSaver Superannuation Scheme (“the SKSS”), collectively referred to as “the Schemes”. In particular the SIPO:

- specifies the Trustee’s overall investment objectives;
- details the Schemes’ investment strategy;
- details the Schemes’ fund managers’ specific objectives;
- allocates responsibilities between the Trustee, the administration manager, the fund managers, and the investment consultant;
- specifies the terms of the investment mandates and constraints to be observed by the fund managers;
- sets out the process for reviewing the investment strategy and updating the SIPO; and
- details the process to follow in the event of a breach of the SIPO.

The SIPO provides a standalone picture of the investment policy and objectives of the LGSS and the SKSS and is consistent with the product disclosure statement for each Scheme.

1.2 Effective date and review of the SIPO

This SIPO takes effect on 1 July 2024. It replaces the previous version dated 2 August 2021. This version reflects a change in the underlying investment manager arrangements.

The SIPO will be reviewed every 3 years to assess its ongoing suitability in light of the circumstances of the Schemes and the prevailing economic environment, with the next review due in July 2027. In the event of a major change to the purposes of the Schemes or a major event impacting the Schemes’ investments the Trustee may consider an earlier review. The review will be carried out by the Trustee in conjunction with the Schemes’ investment consultant, and will consider the objectives of each investment option in light of the circumstances of the Schemes and take account of any changes in the investment outlook which may affect the relative value and role of the different investment sectors.

The Trustee is responsible for approving the SIPO. Changes to the SIPO will be made by resolution of the directors of the Trustee and the updated SIPO will be lodged as required by the Financial Markets Conduct Act 2013 (“FMCA”).

A copy of the current version of the SIPO will be available on each Scheme’s offers and schemes register entry at www.disclose-register.companiesoffice.govt.nz.

1.3 Description of the Schemes

The Schemes have been established to provide retirement and other benefits to employees in the local government sector.

The LGSS is registered under the FMCA as a restricted, employer-related, workplace savings scheme. It provides lump sum benefits to members principally upon leaving service with a participating employer, retirement, death, and hardship.

The SKSS is registered under the FMCA as a restricted, employer-related, KiwiSaver scheme. It provides lump sum benefits on or after attaining the age of entitlement to New Zealand Superannuation, death, and in the other limited circumstances permitted by the KiwiSaver scheme rules set out in the KiwiSaver Act 2006.

The amount of benefit available to a member in either Scheme is determined by the value of the member's savings in the Scheme at the time the benefit is paid.

Each Scheme is governed by a separate trust deed dated 15 March 2016, as amended from time to time.

Members of each Scheme have a choice of five investment options, as follows:

- Aggressive Fund
- Growth Fund
- Balanced Fund
- Conservative Fund
- Automatic Fund

Further details on the investment strategies and objectives of each investment option are set out in this document.

2. The Parties and their responsibilities

2.1 Trustee

The Trustee of the Scheme is Local Government Superannuation Trustee Limited (“LGST”). The directors of LGST at the date of this SIPO are: Mr B J Morrison, Mr J T Hicks, Mr B J F Ferguson, Ms C M Bowers, and Ms L S Miller. The licensed independent trustee director of LGST at the date of this SIPO is Mr G D Hassell.

2.2 Fund managers

The Trustee is responsible for making investment decisions in respect of the Schemes. As at the date of this SIPO, the Trustee has determined to invest the Schemes’ assets in managed funds. The managers of those underlying funds (“fund managers”) are:

- Harbour Asset Management Limited (“HAM”)
- Mercer (N.Z.) Ltd (“Mercer”)

ANZ New Zealand Investments Limited (‘ANZI’), a former fund manager, also has a transitional role in managing underlying funds of the Schemes. The funds managed by ANZI in which the Schemes previously invested were replaced from July 2024, with ANZI’s involvement limited to transitioning the Schemes’ assets across to replacement funds. That involvement is expected to be completed by 31 July 2024.

2.3 Administration manager

The administration manager of the Schemes is Civic Financial Services Limited.

2.4 Investment consultant

The investment consultant is Melville Jessup Weaver.

2.5 Responsibilities of the Trustee

The FMCA requires the Trustee to exercise a prescribed level of care, diligence and skill in exercising any powers or performing any duties in respect of the Schemes. The Trustee, amongst other things, will have regard to the following matters:

- the desire to maintain the real value of capital;
- the risk of capital loss or depreciation;
- the potential for capital appreciation;
- the likely income return;
- taxation;
- the effects of inflation;
- the costs of maintaining the Schemes;
- statutory requirements.

The responsibilities of the Trustee as they relate to the Schemes' investments include:

- to establish the investment objectives and investment strategy for each investment option;
- to ensure the SIPO is adhered to;
- to select funds managed by third party fund managers in which the Schemes' assets are invested;
- to determine whether to appoint investment managers to invest the Schemes' assets;
- to review the performance and the fees of the funds in which the Schemes invest;
- to review the performance of the investment consultant, if one is appointed;
- to communicate to members the results of the Schemes' performance;
- to review the SIPO on a regular basis.

2.6 Fund managers

The responsibilities of the fund managers are:

- to invest the assets of the Schemes in accordance with the investment mandates of each underlying fund selected by the Trustee;
- to provide a copy of their investment guidelines for each underlying fund to the Trustee and to advise the Trustee and the investment consultant of any changes;
- to provide reporting to the Trustee and the investment consultant as required by the Trustee;
- to provide information on changes in personnel;
- to attend Trustee Board meetings when requested.

2.7 Administration manager

The responsibilities of the administration manager are to provide administrative, communication, and promotion services appropriate to the efficient and effective operation of the Schemes, and to ensure that all statutory and regulatory obligations of the Trustee and the Schemes are discharged. This includes assisting the Trustee with the discharge of its obligations in respect of this SIPO.

2.8 Investment consultant

The responsibilities of the investment consultant are:

- to assist the Trustee in the regular review of the Schemes' investment objectives and strategy, including the SIPO;
- to assist the Trustee in the selection of underlying funds and associated fund managers;
- to monitor the performance of the fund managers;
- to provide general advice to the Trustee on investment matters;
- to attend the Trustee's Board meetings when required;
- to provide the Trustee with such additional information as it may require from time to time.

3. Investment Philosophy and beliefs

3.1 Investment beliefs

The key investment beliefs of the Trustee are as follows:

- investment markets are broadly efficient;
- the prime driver of investment results will be the long term strategic asset allocation of the investment options;
- the Trustee does not believe that returns can be enhanced by making tactical asset allocation decisions, and accordingly the asset allocation should be managed on a passive basis;
- the Trustee does not believe that most investment managers can consistently achieve above index returns after taking into account the higher fees charged by active managers, however it believes that with appropriate processes and control of costs, some approaches which are not fully-index tracking can be justified;
- value can be added by efficient implementation and choosing tax effective funds and carefully managing investment costs;
- the Trustee considers that diversification of investment management risk is important.

3.2 How these views are expressed

The investment strategy for the Schemes has been developed in accordance with the above beliefs. A key consideration is the use of active funds versus passive (index-tracking) funds. While the latter usually come at lower fee, in some areas the Trustee believes it can identify active fund managers which are able to justify their incrementally higher fees.

Currently:

- New Zealand equities and international equities are managed on a pure passive basis. This means the fund manager aims to produce gross returns which are broadly in line with the applicable index.
- Other asset classes are managed on an active basis. This means that the fund manager aims to produce returns higher than the applicable index return through stock / security selection decisions. Notwithstanding this active approach, the Trustee does not expect its active fund managers' portfolios to deviate too far from market characteristics.

3.3 Socially responsible investing

The Trustee is mindful of applying the principles of socially responsible investing. The Trustee will evaluate the socially responsible investment policy of the fund managers when appointing or reviewing them. The fund managers' approach to Environmental, Social, and Governance ("ESG") issues will be considered by the Trustee regularly. Where the fund manager's ESG policy does not meet the Trustee's standards, the Trustee will take such actions as it considers appropriate, such as engaging with the fund manager to encourage improvement.

4. Investment Policies

4.1 Adopted policies

The Trustee has adopted the following key investment policies:

- socially responsible investing policy (see paragraph 3.3);
- currency hedging policy (see paragraphs 6.3 and 7.4);
- prohibition on tactical asset allocation (see paragraph 6.4);
- rebalancing policy (see paragraph 6.4); and
- derivatives policy (see paragraph 7.4).

5. Investment Objectives

5.1 Investment objectives of each Scheme

The objective and strategy of each Scheme is to provide members with a range of investment options that will enable members to meet their individual investment objectives in the context of a workplace savings scheme and/or KiwiSaver scheme (as applicable). The Trustee aims to achieve this objective through the individual investment strategies and objectives for each investment option, as set out in this SIPO.

5.2 Investment Options

Members have the choice of five investment options or a mixture thereof as follows:

- Aggressive Fund
- Growth Fund
- Balanced Fund
- Conservative Fund
- Automatic Fund

Each of these strategies has its own investment objectives and benchmark asset allocation.

5.3 Investment Objectives

Aggressive Fund

The investment objectives of the Aggressive Fund are to achieve a high level of real returns over the medium to long term primarily through substantial investment in equities, accepting that the returns may be subject to significant short-term variations. More specifically,

- the Aggressive Fund's investment objective is to achieve a real rate of return (after tax at the highest PIR rate and after investment fees and costs) of 2.00% pa over rolling five year periods;
- it is expected to have a negative return frequency of 1 in 3.0 years, using the investment modelling assumptions adopted by the investment consultant.

This option is suitable for members willing to take a reasonable amount of risk for potentially higher but more volatile returns over the long term.

Growth Fund

The investment objectives of the Growth Fund are to achieve positive real returns over the medium to long term through investment in growth assets, while managing volatility through diversification of the Fund's assets. More specifically,

- The Growth Fund's investment objective is to achieve a real rate of return (after tax at the highest PIR rate and after investment fees and costs) of 1.50% pa over rolling five year periods;
- it is expected to have a negative return frequency of 1 in 3.5 years, using the investment modelling assumptions adopted by the investment consultant.

This option is suited to members seeking long term growth with risk limited by broad diversification. It is intended to be less volatile than the Aggressive Fund, and therefore may realise lower returns over the longer term.

Balanced Fund

The investment objectives of the Balanced Fund are to achieve positive real returns over the medium to long term through investment in a balanced mix of growth and income assets. More specifically,

- the Balanced Fund's investment objective is to achieve a real rate of return (after tax at the highest PIR rate and after investment fees and costs) of 0.75% pa over rolling five year periods;
- it is expected to have a negative return frequency of 1 in 4.0 years, using the investment modelling assumptions adopted by the investment consultant.

This option is suited to members seeking a return profile which balances medium term growth with risk. It is intended to be less volatile than the Growth Fund, and therefore may realise lower returns over the longer term.

Conservative Fund

The investment objectives of the Conservative Fund are to reduce the likelihood of negative returns over the short term with higher proportions of investment in defensive assets, such as cash and bonds, while still providing an opportunity for positive real returns over the longer term by investing a smaller proportion of the assets in growth assets such as equities and property. More specifically,

- the Conservative Fund's investment objective is to achieve a real rate of return (after tax at the highest PIR rate and after investment fees and costs) of 0.00% pa over rolling five year periods;
- it is expected to have a negative return frequency of 1 in 5.5 years, using the investment modelling assumptions adopted by the Investment Consultant.

This option is suited to members seeking low volatility and low risk. It is intended to provide a low chance of a negative return, and therefore may realise lower returns.

Automatic Fund

The investment objectives of the Automatic Fund are to try to achieve an appropriate long-term outcome for investors by accepting a higher investment risk and return volatility in the early stages of a member's working life as a trade-off for potentially higher returns. When a member is younger, the Automatic Fund provides greater exposure to investments with the potential for growth such as overseas and New Zealand equities.

Each month, between the ages of 20 and 80, the Automatic Fund will automatically and smoothly change a member's target investments to a slightly more conservative mix. Thus the member's target exposure to income assets such as fixed interest securities and cash is slightly increased every month and the exposure to growth assets is correspondingly decreased.

This option is suitable for members who wish to start with a relatively high proportion of growth assets, but for that proportion to reduce over time, and who want the rebalancing done on a monthly basis without having to organise this for themselves.

As the Automatic Fund adjusts members' target investments based on age, it is a life cycle investment option for the purposes of the FMCA.

5.4 Taxation

The Schemes' investment income is subject to tax on the following basis:

- fixed interest investments, including cash, are taxed under the Comparative Value regime;
- global equities are taxed under the FDR regime;
- capital gains on NZ equities are not subject to tax. Dividends are taxable.

6. Investment Strategy

6.1 Benchmark asset / manager allocation – Aggressive, Growth, Balanced and Conservative Options

The following table sets out the benchmark asset allocation for the Aggressive, Growth, Balanced and Conservative Options. This may also be referred to as each investment option's 'target asset allocation' in reporting provided to members, as 'target asset allocation' is a term prescribed by regulations for use in those documents.

Asset Class	Product	Benchmark Allocation for Investment Option			
		Aggressive	Growth	Balanced	Conservative
NZ equities	Harbour NZ Index Shares Fund	20.0%	15.0%	10.0%	5.0%
Int. equities	Mercer Overseas Shares Index Portfolio	47.0%	28.5%	19.2%	6.4%
	Mercer Hedged Overseas Shares Index Portfolio	13.0%	11.5%	10.8%	3.6%
Listed property	Harbour Real Estate Investment Fund	10.0%	15.0%	10.0%	5.0%
Total Growth Assets		90.0%	70.0%	50.0%	20.0%
NZ fixed interest	Harbour NZ Core Fixed Interest Fund	3.0%	10.0%	20.0%	35.0%
Int. fixed interest	Hunter Global Fixed Interest Fund*	5.0%	15.0%	20.0%	15.0%
Cash	Harbour Enhanced Cash Fund	2.0%	5.0%	10.0%	30.0%
Total Income Assets		10.0%	30.0%	50.0%	80.0%

* The manager of the Hunter Global Fixed Interest Fund is HAM.

6.2 Benchmark asset / manager allocation – Automatic Option

Each month, between the ages of 20 and 80, the allocation to each asset class changes. Details at four specimen ages are shown in the table below. Due to market movements and cash flow requirements, actual asset allocations will inevitably vary by small amounts from the benchmark allocation.

Asset Class	Product	Age of the Member			
		Age 20	Age 40	Age 60	Age 80
NZ equities	Harbour NZ Index Shares Fund	20.0%	17.5%	12.5%	5.0%
Int. equities	Mercer Overseas Shares Index Portfolio	53.3%	33.7%	18.6%	6.4%
	Mercer Hedged Overseas Shares Index Portfolio	11.7%	11.3%	8.9%	3.6%
Listed property	Harbour Real Estate Investment Fund	10.0%	12.5%	15.0%	10.0%
Total Growth Assets		95.0%	75.0%	55.0%	25.0%
NZ fixed interest	Harbour NZ Core Fixed Interest Fund	1.0%	8.0%	20.0%	30.0%
Int. fixed interest	Hunter Global Fixed Interest Fund*	2.0%	12.0%	20.0%	15.0%
Cash	Harbour Enhanced Cash Fund	2.0%	5.0%	5.0%	30.0%
Total Income Assets		5.0%	25.0%	45.0%	75.0%

* The manager of the Hunter Global Fixed Interest Fund is HAM.

6.3 Foreign currency

The following table sets out the hedging position for each of the global products referred to in sections 6.1 and 6.2 above.

Asset Class	Product	Benchmark hedging position
Int. equities	Mercer Overseas Shares Index Portfolio	Unhedged
	Mercer Hedged Overseas Shares Index Portfolio	139% hedged*
Listed property	Harbour Real Estate Investment Fund	75%-100% hedged **
Int. fixed interest	Hunter Global Fixed Interest Fund	100% hedged

* Hedging gains and losses for international equities are taxable. Therefore, the hedging position stated for this sector is before tax.

** Hedging position applies to the Australian component

The purpose of the Scheme's hedging is:

- a for international bonds and the Australian component of the Harbour Real Estate Investment Fund is to eliminate all foreign currency risk;
- b for global equities, the hedging policy recognises that it is beneficial from a long term investment viewpoint to have some exposure to foreign currency, but that members should not have a full exposure to currency movements.

The hedging is carried out by the fund managers. The fund managers are responsible for ensuring that the hedging ratio is at the stated level, within tolerances, and will report to the Trustee if there have been any breaches.

6.4 Asset allocation ranges, tactical asset allocation and rebalancing

Tactical asset allocation

Mindful that any changes to the benchmark asset allocations, including temporary ones, can lead to losses instead of the hoped for gains, the Trustee currently does not attempt or desire to attempt to improve investment returns by making tactical asset allocation decisions.

Asset allocation ranges and rebalancing

It is recognised however that market movements and cash flow can result in the actual asset allocation becoming different to the benchmark asset allocation. Accordingly, the Trustee has adopted the following rebalancing approach:

If either:

- the allocation to any particular asset class as at the previous month end varies from the benchmark allocation to that sector by more than 7.5%; or
- the allocation to growth or income assets as at the previous month end varies from the benchmark allocation by more than 7.5%;

then the Trustee shall arrange for a rebalancing to take place such that the actual allocations are within the +/- 7.5% ranges above. Any required rebalancing shall be made within 1 month of the previous month end.

The maximum permitted variance of the allocation to either a particular asset class or to growth/ income assets from the relevant benchmark is 12%. If the Trustee identifies that the allocation to either a particular sector or to growth / income assets has varied from the relevant benchmark by more than +/- 12%, then the Trustee shall arrange for a rebalancing to within +/- 7.5% of the relevant benchmark to take place within five working days of becoming aware of that variation.

Formal monitoring will occur at the end of each month.

It is noted that the primary mechanism for managing the asset allocations within the ranges set out above shall be the allocation of cashflow. However, where this is not possible and an allocation to either a particular sector or the allocation to growth / income assets is outside the relevant range, then a rebalancing between sectors will be made.

On 31 May 2024 the Trustee determined to replace a number of the underlying funds of the Schemes. In order to achieve an orderly transition from the former underlying funds to the new ones, it may take a month or two to complete the changeover. During that period it is likely that the Schemes' asset class/manager allocation and ranges will differ from those contemplated above, and a greater weighting in cash may be held from time to time. Any such variation attributable to the change in underlying funds and fund managers that took place on 1 July 2024 is permitted. Accordingly, for the purposes of section 167 of the FMCA, no limit break will occur if the actual asset allocation to an underlying fund:

- was, in respect of a former underlying fund when the 1 July 2024 amendment took effect, within the range for that fund that applied immediately prior to the amendment; or
- is brought in line with the new asset class/manager allocated ranges contemplated above within two months of the amendment taking effect.

6.5 Investment strategy and benchmark review

The investment strategy shall be reviewed on a triennial basis, or as otherwise required, in accordance with paragraph 1.2. The review will consider the objectives of each investment option in light of the circumstances of the Schemes and take account of any changes in the investment outlook which may affect the relative value and role of the different investment sectors.

7. Investment Guidelines for underlying funds

7.1 Passive and active management

New Zealand equities and international equities are to be invested on an indexed basis. This means that the funds aim to passively track the market index (before the deduction of fees and tax).

Other investments are actively managed.

7.2 Fund Managers

A detailed description of the Mercer and HAM investments can be obtained on request to Civic Financial Services Limited. You can contact Civic Financial Services Limited at admin@civicfs.co.nz.

7.3 Investment restrictions

The investment parameters are:

- as far as practicable, all investments are to be readily marketable;
- for equity and fixed interest investments, reliable market quotations for prices available at all times;
- all investment portfolios are to be fully invested, subject to any cash held from time to time to allow for settlement mismatches and cashflows. Any other cash positions, unless part of the investment mandate, should be temporary and should reflect general repositioning of the portfolio or covering a futures position;
- currency exposure for international fixed interest is to be 100% hedged to the NZ dollar, with a tolerance of +/- 5%;
- futures contracts, options and other derivatives are to be restricted to hedging and efficient portfolio management techniques and not to leverage the portfolio;
- securities are not to be lent to any third party without the written consent of the Trustee;
- no more than 7.5% of a Fund shall be invested in any one company, except in the case of cash exposures to New Zealand registered banks and holdings in companies arising through passive trading of a particular index by a fund manager.

7.4 Agreement to deviate

A fund manager may request from the Trustee permission to go outside of the agreed guidelines. Any such request shall be in writing and include details of the reasons for such a request. The Trustee must approve any such request.

It is accepted that the assets are invested through managed funds. As a result, it may not be possible to comply with the investment guidelines at all times, and accordingly these guidelines are not limits for the purposes of the FMCA. However, any exceptions to the above should be approved by the Trustee.

8. Investment Monitoring

8.1 Monitoring compliance

The Trustee monitors compliance with the SIPO through the reporting provided to it (via the administration manager, where appropriate), as set out below. The fund managers' and Schemes' compliance with this SIPO is formally reviewed by the Trustee at each quarterly Board meeting, based on that information. Any required changes to the SIPO will be made as outlined in paragraph 1.2.

In addition, if a limit break occurs, the administration manager will provide all information required for the Trustee to make any required reports to the FMA. At that time the Trustee will consider whether any action needs to be taken in respect of the break, or whether any further compliance monitoring or assurance measures are required.

For the purposes of this SIPO, a "limit break" is any material breach of any limits on either the nature or type of investments that may be made by the Schemes or the proportion of each type of assets that may be invested in, as set out in this SIPO (see paragraph 6.4).

8.2 Evaluation Criteria

The criteria by which the performance of each fund manager will be measured are set out below:

Individual Sector Performance – performance relative to benchmark

Fund managers are expected to achieve a return before tax and investment fees and other expenses relative to the relevant index return as set out below.

Asset Class	Benchmark Index	Outperformance target (% pa) *
<i>NZ equities</i>		
Harbour NZ Index Shares Fund	S&P / NZX 50 Portfolio Index (incl imp credits)	Nil
<i>Int. equities</i>		
Mercer Overseas Shares Index Portfolio	MSCI World Index excluding Tobacco, Controversial and Nuclear Weapons (NZD)	Nil
Mercer Hedged Overseas Shares Index Portfolio	MSCI World Index excluding Tobacco, Controversial and Nuclear Weapons (139% hedged to the NZD)	Nil
<i>Listed property</i>		
Harbour Real Estate Investment Fund	S&P/NZX All Real Estate Index (incl imp credits)	1.0%
<i>NZ fixed interest</i>		
Harbour NZ Core Fixed Interest Fund	Bloomberg NZBond Composite 0+ Yr Index,	0.50%
<i>Int. fixed interest</i>		
Hunter Global Fixed Interest Fund	Bloomberg Barclays Global Aggregate Bond Index - 100% hedged	0.50%
<i>Cash</i>		
Harbour Enhanced Cash Fund	S&P/NZX Bank Bills 90 Day Index	0.2%

* Outperformance targets are measured over rolling three year periods

8.3 Investment Performance Monitoring

The individual sector performance objectives shall be monitored on a quarterly basis. For this purpose, the investment consultant will provide a quarterly monitoring report which provides actual and benchmark sector returns for the quarter, the previous year, the previous three years, and the previous five years.

8.4 Fund Manager Review

The fund managers shall be subject to a formal review at least every three years. More frequent reviews will take place if the Trustee has any cause for concern.

9. Investment Reporting

9.1 Fund Managers

Accurate unit prices are required from the fund managers for each business day, including relevant PIE tax information.

The following information is required from the fund managers on a monthly basis for each asset class under management:

- market values as at the month end;
- actual returns gross of fees and tax for the month, rolling quarter and year to date;
- index returns for the same periods;
- taxable income for the month and year to date;
- contributions and withdrawals for the month.

The reports are required no later than the tenth business day following month end.

In addition, at the end of each quarter, each fund manager is to provide a more comprehensive report including:

- accounting information over the period including a balance sheet, and transaction details;
- comment on past performance and the reason for out/under performance;
- economic comment pertinent to the mandate and the outlook for future returns.

At the end of the financial year, such additional information as is required to enable the financial statements of the Schemes to be prepared.

9.2 Investment Consultant

On a half-yearly basis or such other frequency as agreed, the investment consultant will provide an investment performance report to the Trustee which contains sufficient information to enable the Trustee to monitor the performance of the fund managers against the evaluation criteria. The performance report shall include at least the following information:

- market values as at the end of the quarter;
- actual returns gross of fees and tax for each of the Aggressive, Growth, Balanced and Conservative portfolios for the quarter, the previous year and the previous three years;
- benchmark returns for the same periods;
- actual and benchmark sector returns for the quarter, the previous year, the previous three years, and the previous five years;
- a comparison of returns against other fund managers;
- an investment commentary, including fund manager developments;
- such other information as may be requested by the Trustee.

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