

Statement of Investment Policy and Objectives

Mercer Investment Funds

This document replaces the SIPO registered on
Disclose on 30 January 2026.



Contents

- 1. Description of the Managed Investment Scheme..... 3
- 2. Investment Philosophy..... 4
- 3. Fund Investment Strategies and Objectives..... 5
 - Mercer Responsible Balanced Fund 5
 - Mercer Income Generator Fund 8
 - Mercer Macquarie NZ Cash Fund 10
 - Mercer Macquarie NZ Fixed Interest Fund..... 12
 - Mercer Macquarie NZ Short Duration Fund 15
 - Mercer Responsible Trans-Tasman Shares Fund 18
 - Mercer Global Shares Fund 20
 - Mercer Core Global Shares Fund 22
 - Mercer Core Hedged Global Shares Fund..... 24
 - Mercer Responsible Global Shares Fund 26
 - Mercer Global Listed Real Estate Fund 28
 - Mercer Global Listed Infrastructure Fund..... 30
 - Mercer NZ Shares Passive Fund 32
 - Mercer Responsible Hedged Global Fixed Interest Index Fund 33
 - Mercer All Country Global Shares Index Fund..... 34
- 4. Investment Process 35
- 5. Investment Performance Monitoring Policy 39
- 6. SIPO Review and Monitoring 40
- 7. Key Investment Policies..... 41
- 8. Glossary 48
- 9. Appendix 1 49

Other than Macquarie Bank Limited (MBL), none of the entities noted in this document are authorised deposit-taking institutions for the purposes of the Banking Act 1959 (Commonwealth of Australia). The obligations of these entities do not represent deposits or other liabilities of MBL. Any investments are subject to investment risk including possible delays in repayment and loss of income and principal invested. MBL does not guarantee or otherwise provide assurance in respect of the obligations of these entities, unless noted otherwise.

1. Description of the Managed Investment Scheme

The Mercer Investment Funds is a managed investment scheme (**Scheme**). The Scheme has on offer 15 investment funds as listed below (and separated into investment categories):

Mercer Multi-Asset-Class Funds

Mercer Responsible Balanced Fund

Mercer Income Generator Fund

Mercer Cash and Fixed Interest Funds

Mercer Macquarie NZ Cash Fund

Mercer Macquarie NZ Fixed Interest Fund

Mercer Macquarie NZ Short Duration Fund

Mercer Responsible Hedged Global Fixed Interest Index Fund

Mercer New Zealand and Australian Shares Funds

Mercer Responsible Trans-Tasman Shares Fund

Mercer NZ Shares Passive Fund

Mercer Global Shares Funds

Mercer Global Shares Fund

Mercer Responsible Global Shares Fund

Mercer Core Global Shares Fund

Mercer Core Hedged Global Shares Fund

Mercer All Country Global Shares Index Fund

Mercer Property and Infrastructure Funds

Mercer Global Listed Real Estate Fund

Mercer Global Listed Infrastructure Fund

For a list of changes and previous fund names, please refer to Appendix 1 on page 42.

The Manager of the funds from 3rd March 2023 is Mercer (N.Z.) Limited (“Mercer”, “Manager”, “we”, “us”, “our”) who is also the current licensed manager of the Scheme.

2. Investment Philosophy

Mercer's global investment philosophy articulates the underlying assumptions and convictions that guide how all Mercer colleagues support our investors' investment needs across research, advice and solutions.

Our investment approach is governed by a set of guiding principles across governance, risks and value - with our investors' objectives at the core.

Investor objectives

- Investment success hinges on clearly defined investment goals.
- An investor's true risk lies in not being able to meet their primary objective.
- Aligning governance processes is essential for driving investment performance.

Strong governance

- Robust and high-quality governance processes are fundamental to achieving successful investment outcomes.
- Strong governance becomes even more essential during periods of stress.
- Establishing clear accountability for results promotes disciplined decision-making and risk-taking.
- Effective stewardship plays a crucial role in improving investment outcomes.

Rewarded risk

- Asset allocation is the most important factor influencing risk and return outcomes.
- While risk and return are related, the relationship can vary over time.
- Understanding how risks interact is critical to making informed investment choices.
- Investors should focus on the risks that matter most to their specific circumstances.
- Integrating financially material sustainability transition and socio-economic risks into investment decision-making can potentially enhance portfolio resilience.

Maximise value

- Strategic asset allocation serves as the primary driver of value creation.
- Active management can be employed when the expected return benefits justify the associated risks and fees.
- For long-term investors, private markets can offer certain advantages over public markets.
- Dynamic asset allocation can add value to investment strategies.
- Investing to solve long-term systemic issues may provide opportunities to improve risk-adjusted returns.

3. Fund Investment Strategies and Objectives

The investment strategies and objectives for the funds are set out as follows. Additional information about underlying managers and underlying funds is available by emailing Mercer at ClientsNZ@mercer.com.

Mercer Responsible Balanced Fund¹

Description of the fund

The fund is a diversified portfolio with a slightly higher allocation to a mix of growth assets (e.g., shares and listed infrastructure) relative to a mix of income assets (e.g., cash and fixed interest). The fund is managed to include specific additional responsible exclusion criteria which aims to avoid investments in certain companies or activities, and is managed with reference to environmental, social and governance factors and has some exposure to investment strategies targeting sustainability themes. This fund has additional exclusions applied as described in our Sustainable Investment Policy and has been certified by the Responsible Investment Association of Australasia (RIAA).

See page 33, “Sustainable Investment” for information on the exclusions that apply to this fund. For more information on sustainable investing, you can find our Sustainable Investment Policy at www.disclose-register.companiesoffice.govt.nz, located under the 'Documents' tab on the managed fund offer register for the Mercer Investment Funds.

Investment objectives

The Fund aims to achieve a rate of return (after fees) that exceeds CPI increases by at least 2.5% per annum after tax and 3.5% before tax over a minimum of eight years and to outperform, over periods of one year or greater, the weighted average return of the market indices used to measure performance of the underlying funds/assets in which the fund invests.

Investment strategy

The Fund invests in a mix of investments using a multi-manager approach.²

Benchmark asset allocation ranges

The benchmark asset mix noted below is the expected average asset mix of the fund over the long term.

Asset Class	Benchmark asset allocation (%)	Range (%)	Benchmark index
Cash and cash equivalents	4	0-20	S&P/NZX Bank Bill 90-Day Index

¹ Prior to 1st December 2025, the fund was called the Mercer Sustainable Balanced Fund.

² The fund invests fully into the MITNZ, see Investment Structure for further information.

New Zealand fixed interest	10		S&P/NZX Government Bond Index
International fixed interest:			
• Overseas sovereign bonds	11		JP Morgan Global Government Bond Index (100% hedged to NZD on an after-tax basis*)
• Global Credit	10		Bloomberg Global Aggregate Corporate Index (100% hedged to NZD on an after-tax basis*)
Private Debt	0	0-10	
Other fixed interest**	5		S&P/NZX Bank Bill 90-Day Index
Total fixed interest assets	36	21-51	
Total income assets	40	30-60	
Alternative assets	0		
Listed Infrastructure	2		FTSE Developed Core Infrastructure 50/50 Index with net dividends reinvested (100% hedged to NZD on an after-tax basis*)
Unlisted Infrastructure	3		MSCI Australia Quarterly Private Infrastructure Fund Index (Unfrozen) – 50th percentile Post-Fee Total Return (All Funds) 3M Lag (100% hedged to NZD on an after-tax basis*)
Unlisted property	3		Composite: 70% MSCI/Mercer Australia Core Wholesale Monthly Property Fund Index - NAV Weighted Post-Fee Total Return (All Funds) 1M Lag (100% hedged to NZD on an after-tax basis*), and 30% MSCI/Property Council of New Zealand Annual Property Index published quarterly
Total real assets	8	2-20	
Australasian equities	13	3-23	S&P/NZX 50 Index including imputation credits
International equities	39	29-49	MSCI World Index with net dividends reinvested (50% hedged to NZD on an after-tax basis*)
Total growth assets	60	40-70	
Total	100		

*At a 28% prescribed investor rate

**Other fixed interest refers to investments in fixed interest securities not otherwise listed above. This may include investments in specific fixed interest portfolios such as short-term bond and absolute return bond portfolios for example.

Permitted investments

The fund can invest in any of the asset classes listed in the table above either directly or via investment in other funds.

Derivatives

The fund (including any underlying managers if applicable) may use derivatives for the purpose of:

- protecting against risks such as unfavourable changes in an investment's price;
- enhancing returns by taking advantage of favourable mispricing within a market, as a cost-effective alternative to purchasing;
- physical assets;

- implementing the investment objectives of the fund; and
- currency management.

The fund is also permitted to hold derivatives related to each asset class so long as the total market value exposure of each asset class (i.e., the physical plus the underlying derivative market value exposure) remains within the permitted asset allocation ranges.

Currency management

Asset Class/Sector	Benchmark (%)	Active Management Range (Target %)
International equities ¹	50	0-100
Real assets investments ²	100	-
International fixed interest	100	-

1. The level of currency hedging for overseas shares is managed between 0% and 100% and may change over time depending on Mercer's view of the relative strength (or weakness) of the New Zealand dollar.
2. 100% hedged to NZ\$ on a net of tax basis for a 28% PIR taxpayer.

See page 30 "Hedging" for more information on funds for which the Fair Dividend Rate (FDR) taxation method is applicable, but where these funds are not eligible to apply FDR to their foreign currency hedges and why these funds may therefore apply gross hedging.

Mercer Income Generator Fund

Description of the fund

The fund aims to provide a gross fixed monthly income in excess of bank deposit rates, along with a positive return on capital over the long term. To achieve this, the fund invests in a diversified mix of growth and defensive assets, with a focus on reliable income generation. Environmental, Social and Governance characteristics are integrated into the underlying investment managers' investment processes.

For more information on sustainable investing, see the 'Sustainable Investment' section on page 33. Additionally, you can find our Sustainable Investment Policy at www.disclose-register.companiesoffice.govt.nz, located under the 'Documents' tab on the managed fund offer register for the Mercer Investment Funds.

Investment objectives

To maximise the amount of the monthly distribution payments to investors by outperforming, over the medium term, the weighted average return of the market indices used to measure performance of the underlying funds/assets in which the fund invests.

Investment strategy

Investment in a diversified mix of growth and defensive assets aims to provide regular income along with a positive return on capital over the long term. Payment of a fixed monthly distribution is delivered by managing a diversified range of income-producing assets such as fixed interest securities, corporate bonds, equities, and infrastructure. The fund gains most of its underlying investment exposure by investing into other funds¹

Benchmark asset allocation ranges

The benchmark asset mix noted below is the expected average asset mix of the fund over the long term.

Asset Class	Benchmark asset allocation (%)	Range (%)	Benchmark index
Cash and cash equivalents	10	0-20	Bloomberg NZBond Bank Bill Index
New Zealand fixed interest	5 20	0-15 10-30	Bloomberg NZBond Composite 0+ Yr Index Bloomberg NZBond Credit 0+ Yr Index
International fixed interest	25	15-35	Bloomberg MSCI Global Aggregate SRI Select ex-Fossil Fuels Index (100% hedged to the NZD on an after-tax basis*)
Total defensive assets	60	45-75	
Australasian equities*	30	20-40	S&P/NZX50 Index (on a gross basis including imputation credits)
International listed infrastructure	5	0-15	FTSE Developed Core Infrastructure 50/50 Index (100% hedged to the NZD on an after-tax basis)
Listed property	5	0-15	FTSE EPRA/NAREIT Developed Total Return Index with net dividends reinvested (100% hedged to the NZD on an after-tax basis*)

¹ The fund invests indirectly partially into the MITNZ, see Investment Structure for further information.

Total growth assets	40	25-55
Total	100	

*In this fund, Australasian equities include any New Zealand domiciled listed or unlisted company, together with any non-New Zealand (including Australian) domiciled company with a listing on the New Zealand Stock Exchange. New Zealand shares also include futures and options on such shares.

Permitted investments

The fund can invest in any of the asset classes listed in the table above either directly or via investment in other funds.

Derivatives

The fund (including any underlying managers if applicable) may use derivatives for the purpose of:

- protecting against risks such as unfavourable changes in an investment’s price;
- enhancing returns by taking advantage of favourable mispricing within a market, as a cost-effective alternative to purchasing;
- physical assets;
- implementing the investment objectives of the fund, and
- currency management.

The fund is also permitted to hold derivatives related to each asset class so long as the total market value exposure of each asset class (i.e., the physical plus the underlying derivative market value exposure) remains within the permitted asset allocation ranges.

Currency management

The assets included in the international listed property category are hedged back to New Zealand dollars. For the international listed infrastructure category, the currency weights of the underlying index are hedged back to New Zealand dollars. The assets included in the global corporate bonds category are also hedged back to New Zealand dollars.

Mercer Macquarie NZ Cash Fund

Description of the fund

The fund is an actively managed portfolio of bank bills, floating rate notes and short-term securities and liquid deposits and is a low risk investment product that targets capital security. Environmental, Social and Governance characteristics are integrated into our investment process where applicable.

For more information on sustainable investing, see the 'Sustainable Investment' section on page 33. Additionally, you can find our Sustainable Investment Policy at www.disclose-register.companiesoffice.govt.nz, located under the 'Documents' tab on the managed fund offer register for the Mercer Investment Funds.

Investment objectives

To provide a Gross Return above the return of the Bloomberg NZBond Bank Bill Index on a rolling 12-month basis.

Investment strategy

Investment is primarily in investment grade New Zealand short-term securities, liquid deposits, and floating rate notes in the wholesale money market, with a focus on adding value by credit risk management and interest rate management. The fund targets a maximum weighted average duration not exceeding six months.

Benchmark asset allocation ranges

Asset class	Benchmark asset allocation (%)	Range (%)
Cash and cash equivalents as follows:	100	
<ul style="list-style-type: none"> New Zealand Government or government guaranteed securities, bank risk or debt securities and registered bank deposits/cash 		50-100
<ul style="list-style-type: none"> Corporate securities 		0-50
<ul style="list-style-type: none"> Floating rate notes 		0-25

Permitted investments

The fund can invest in any of the asset classes and security types listed in the table above subject to the following restrictions:

- Maximum of 30% in securities issued or guaranteed by any one bank
- Maximum of 20% in securities issued or guaranteed by any other entity (other than those issued or guaranteed by the New Zealand Government or Reserve Bank of New Zealand) rated A1 or higher (by Standard and Poor's or an equivalent rating agency).
- Maximum of 10% in securities issued or guaranteed by any other entity (other than those issued or guaranteed by the New Zealand Government or Reserve Bank of New Zealand) rated A2 (by Standard and Poor's short term credit ratings or an equivalent rating agency).

- Maximum exposure to A2 (by Standard and Poor's short term credit ratings or an equivalent rating agency) securities of 20%.
- No exposure to entities rated below A2 (by Standard and Poor's short term credit ratings or an equivalent rating agency).
- The Manager shall ensure that any local authority investments are of credit quality equivalent to a corporate issue with a Standard and Poor's short term credit ratings rating of A2 or higher.
- Investment in collateralised debt obligations, collateralised loan obligations or credit default swaps is not permitted.
- Investments in foreign currency denominated investments are not permitted.
- The maximum final maturity date of any floating rate notes is three years.
- Floating rate note exposure with final maturity longer than one year but less than three years will be limited to repo eligible bank and local authorities, rated A- or higher.
- The maximum final maturity of all other assets is one year.
- The weighted average duration of the portfolio is not to exceed 185 days. The duration implications of derivatives are to be included when calculating the weighted average duration.

Derivatives

The fund (including any underlying managers if applicable) may use derivatives for the purpose of:

- protecting against risks such as unfavourable changes in an investment's price;
- enhancing returns by taking advantage of favourable mispricing within a market, as a cost-effective alternative to purchasing;
- physical assets;
- implementing the investment objectives of the fund, and
- currency management.

The fund is also permitted to hold derivatives related to each asset class so long as the total market value exposure of each asset class (i.e., the physical plus the underlying derivative market value exposure) remains within the permitted asset allocation ranges.

Mercer Macquarie NZ Fixed Interest Fund

Description of the fund

The fund is an actively managed portfolio of fixed interest securities. It is a medium risk investment product, focusing predominantly on government bonds and corporate securities in the New Zealand market. Environmental, Social and Governance characteristics are integrated into our investment process.

For more information on sustainable investing, see the 'Sustainable Investment' section on page 33. Additionally, you can find our Sustainable Investment Policy at www.disclose-register.companiesoffice.govt.nz, located under the 'Documents' tab on the managed fund offer register for the Mercer Investment Funds.

Investment objectives

To provide a Gross Return above the return of the Bloomberg NZBond Composite 0+ Yr Index on a rolling three-year basis.

Investment strategy

Investment is in a diversified portfolio of primarily investment grade quality corporate and government securities. Derivatives are frequently utilised to manage risk. The portfolio is structured to add value through credit risk management and interest rate management. The portfolio may also contain a modest amount of foreign currency fixed interest securities, 100% hedged back to New Zealand dollars.

Benchmark asset allocation ranges

The benchmark asset mix below is the expected average asset mix of the fund over the long term.

Asset class	Benchmark asset allocation (%)	Range (%)
New Zealand fixed interest* as follows:	100	
• On call NZ cash, short-term securities and deposits		0-50
• New Zealand Government, corporate and other non-government securities		50-100
• Local Government Funding Authority	0	0-50
International Fixed Interest**	0	0-20

*New Zealand fixed interest may also include foreign currency issues of New Zealand entities.

**Investment in international fixed interest is restricted to foreign currency issues of the Australian parents of New Zealand entities, Australian dollar issues of all other Australian entities and New Zealand dollar issues of non-New Zealand entities.

Permitted investments

The fund can invest in any of the asset classes and security types listed in the table above subject to the following restrictions:

- Maximum exposure to securities issued, or guaranteed by entities (other than those issued or guaranteed by the New Zealand Government, Reserve Bank of New Zealand, or Local Government Funding Agency) shall comply with the following credit rating constraints:

• AAA to BBB-	100%
• AA+ to BBB-	100%
• A+ to BBB-	85%
• BBB+ to BBB-	15%

- Maximum exposure to securities issued or guaranteed by any one entity (other than those issued or guaranteed by the New Zealand Government, Reserve Bank of New Zealand, or Local Government Funding Authority) shall comply with the following credit rating constraints:

• Major Bank* rated A- or better	8%
• AAA	10%
• AA+ to AA	8%
• A+ to A-	6%
• BBB+ to BBB-	4%

*Major bank is defined as ANZ Bank New Zealand Limited (ANZ), ASB Bank Limited (ASB), Bank of New Zealand (BNZ), Westpac New Zealand Limited (WBC) and their respective parent banks.

- No exposure to securities rated lower than BBB- (by Standard and Poor's or an equivalent rating agency).
- Unrated securities shall not be held, except for local authority securities which have been allocated a Manager rating A- or higher, or senior unsecured securities of an issuer rated BBB- or higher by Standard and Poor's or an equivalent rating agency.
- Exposure to the Local Government Funding Agency is permissible as described above while it retains a credit rating of AA or higher.
- Investment in collateralised debt obligations, collateralised loan obligations or credit default swaps is not permitted.
- Investment in foreign currency denominated issues is permitted up to 20% of the portfolio. Cross currency swaps are only permitted in order to remove currency risk resulting from foreign currency security exposures.
- The fund is permitted to invest in direct loans which comply with the Manager's risk policy criteria.
- The duration of the portfolio is to be no more than two years longer or shorter than the Bloomberg NZBond Composite 0+ Yr Index duration.
- The duration implications of derivative products are to be considered included when calculating the weighted average duration.

Derivatives

The fund (including any underlying managers if applicable) may use derivatives for the purpose of:

- protecting against risks such as unfavourable changes in an investment's price;
- enhancing returns by taking advantage of favourable mispricing within a market, as a cost-effective alternative to purchasing;

- physical assets;
- implementing the investment objectives of the fund; and
- currency management.

The fund is also permitted to hold derivatives related to each asset class so long as the total market value exposure of each asset class (i.e., the physical plus the underlying derivative market value exposure) remains within the permitted asset allocation ranges.

Currency management

The fund targets a position of being fully hedged to the New Zealand dollar.

Mercer Macquarie NZ Short Duration Fund

Description of the fund

The fund is an actively managed portfolio of fixed interest securities. It is a low-risk investment product, focusing predominantly on corporate securities in the New Zealand and Australian market with a shorter average maturity than a standard fixed interest fund. Environmental, Social and Governance characteristics are integrated into our investment process.

For more information on sustainable investing, see the 'Sustainable Investment' section on page 33. Additionally, you can find our Sustainable Investment Policy at www.disclose-register.companiesoffice.govt.nz, located under the 'Documents' tab on the managed fund offer register for the Mercer Investment Funds.

Investment objectives

To provide a Gross Return above the return of the Bloomberg NZBond Swaps 1–3 Year Index on a rolling three-year basis.

Investment strategy

Investment is in a range of fixed interest securities, including corporate, bank, local authority and state-owned enterprise (SOE) bonds, mortgage and asset-backed securities, infrastructure debt, government bonds, credit default swaps, interest rate swaps, cash, and cash-like securities. The portfolio specifically targets credit risk and interest rate risk as a source of return.

The portfolio may also contain a modest amount of foreign currency fixed interest securities, 100% hedged back to New Zealand dollars.

Benchmark asset allocation ranges

The benchmark asset mix below is the expected average asset mix of the fund over the long term.

Asset class	Benchmark asset allocation (%)	Range (%)
New Zealand fixed interest* as follows:	100	
• NZ issued securities, including corporate bonds, SOE, local authority and government bonds		0-100
• Mortgage and other asset-backed bonds		0-25
• On call NZ cash, short-term securities and term deposits		0-100
• Local Government Funding Authority		0-50
International Fixed Interest**	0	0-30

*New Zealand fixed interest may also include foreign currency issues of New Zealand entities.

**Investment in international fixed interest is restricted to foreign currency issues of the Australian parents of New Zealand entities, Australian dollar issues of all other Australian entities and New Zealand dollar issues of non-New Zealand entities.

Permitted investments

The fund can invest in any of the asset classes and security types listed in the table above subject to the following restrictions:

- Maximum exposure to securities issued, or guaranteed by entities (other than those issued or guaranteed by the New Zealand Government, Reserve Bank of New Zealand or Local Government Funding Authority) shall comply with the following credit rating constraints:

• AAA to BBB-	100%
• AA+ to BBB-	85%
• A+ to BBB-	85%
• BBB+ to BBB-	20%
- Maximum exposure to securities issued or guaranteed by any one entity (other than those issued or guaranteed by the New Zealand Government, Reserve Bank of New Zealand or Local Government Funding Authority) shall comply with the following credit rating constraints:

• Major Bank* rated A- or better	10%
• AAA to AA-	10%
• A+ to A-	8%
• BBB+ to BBB-	6%

*Major bank is defined as ANZ Bank New Zealand Limited (ANZ), ASB Bank Limited (ASB), Bank of New Zealand (BNZ), Westpac New Zealand Limited (WBC) and their respective parent banks.

- No exposure to securities rated lower than BBB- (by Standard and Poor's or an equivalent rating agency).
- Unrated securities shall not be held, except for local authority securities which have been allocated a Manager rating A- or higher.
- Investment in foreign currency issues is restricted as follows:
 - foreign currency issues of New Zealand entities
 - foreign currency issues of the Australian parents of New Zealand entities, and
 - Australian dollar issues of all other Australian entities.
- Investment in foreign currency denominated issues is permitted up to 30% of the portfolio. Cross currency swaps are only permitted in order to remove currency risk resulting from foreign currency security exposures.
- Investment in collateralised debt obligations or collateralised loan obligations is not permitted.
- The manager may use credit default swaps up to 30% of the portfolio.
- The duration of the fund must remain within a 0 to 3-year range.

Derivatives

The fund (including any underlying managers if applicable) may use derivatives for the purpose of:

- protecting against risks such as unfavourable changes in an investment's price;
- enhancing returns by taking advantage of favourable mispricing within a market, as a cost-effective alternative to purchasing;
- physical assets;
- implementing the investment objectives of the fund; and
- currency management.

The fund is also permitted to hold derivatives related to each asset class so long as the total market value exposure of each asset class (i.e., the physical plus the underlying derivative market value exposure) remains within the permitted asset allocation ranges.

Currency management

The fund targets a position of being fully hedged to the New Zealand dollar.

Mercer Responsible Trans-Tasman Shares Fund

Description of the fund

The fund is a diversified portfolio of predominantly New Zealand shares across a range of industries and sectors. The portfolio may also invest in Australian shares. This fund is managed to include specific additional responsible exclusions criteria which aims to avoid investments in certain companies or activities, and is managed with reference to environmental, social and governance factors. This fund has additional exclusions applied as described in our Sustainable Investment Policy and has been certified by the Responsible Investment Association of Australasia (RIAA).

See page 33, “Sustainable Investment” for information on the exclusions that apply to this fund. For more information on sustainable investing, you can find our Sustainable Investment Policy at www.disclose-register.companiesoffice.govt.nz, located under the 'Documents' tab on the managed fund offer register for the Mercer Investment Funds.

Investment objectives

To provide a Gross Return above the return of the S&P/NZX 50 Index (on a gross basis and including imputation credits) over a rolling three-year period.

Investment strategy

Investment is in a portfolio of predominantly New Zealand shares which is generally exposed to companies with a sustainable competitive advantage, a good growth outlook and the ability to grow earnings. The portfolio takes a sustainable investment approach, which integrates environmental, social and governance factors while aiming to avoid companies or industries with recognised high negative social impact.¹

Benchmark asset allocation ranges

The benchmark asset mix noted below is the expected average asset mix of the fund over the long term. The fund will be actively managed within the given ranges:

Asset class	Benchmark asset allocation (%)	Range (%)
Cash and cash equivalents	0	0-10
Australasian equities*	100	75-100

*In this fund, Australasian equities are defined to be New Zealand equities and equities listed on the Australian Securities Exchange, that meet the Environmental, Social and Governance (ESG) criteria of any underlying investment manager and our Sustainable Investment Policy.

Permitted investments

The fund can invest in any of the asset classes listed in the table above subject to the following restrictions:

- The allowable range for any individual company which has a benchmark weight greater than 10% is +/-10% relative to its benchmark weight in the relevant index.
- The allowable range for any individual company which has a benchmark weight less than 10% is +/-6% relative to its benchmark weight in the relevant index.

¹ The fund invests fully into the MITNZ, see Investment Structure for further information.

- Unlisted securities individually limited to 3% of portfolio and collectively to 10% of the portfolio.
- Exposure to Australian shares and any Australian cash held will not exceed 25% of the market value of the fund.

Derivatives

The fund (including any underlying managers if applicable) may use derivatives for the purpose of:

- protecting against risks such as unfavourable changes in an investment's price;
- enhancing returns by taking advantage of favourable mispricing within a market, as a cost-effective alternative to purchasing;
- physical asset;
- implementing the investment objectives of the fund; and
- currency management.

¹ The fund invests fully into the MITNZ, see Investment Structure for further information.

The fund is also permitted to hold derivatives related to each asset class so long as the total market value exposure of each asset class (i.e., the physical plus the underlying derivative market value exposure) remains within the permitted asset allocation ranges. Derivatives, measured on a notional face value basis, may not exceed 20% of the net market value of the portfolio.

Currency management

The underlying manager has discretion to hedge the fund's Australian dollar assets back to New Zealand dollars. The base position is for the Australian dollar exposure to be unhedged.

Mercer Global Shares Fund

Description of the fund

The fund invests in international shares listed on share markets around the world by using investment managers from around the world which are combined in a multi-manager fund. Environmental, Social and Governance characteristics are integrated into the underlying investment managers' investment processes where applicable.

For more information on sustainable investing, see the 'Sustainable Investment' section on page 33. Additionally, you can find our Sustainable Investment Policy at www.disclose-register.companiesoffice.govt.nz, located under the 'Documents' tab on the managed fund offer register for the Mercer Investment Funds.

Investment objectives

To provide a Gross Return above the return of the MSCI All Country World Index with net dividends reinvested (50% NZD hedged) on a rolling three-year basis.

Investment strategy

Investments are spread across a range of international share markets, including developed and emerging economies. The portfolio is further diversified by region, manager, and investment approach with the aim of delivering more stable returns.¹

Benchmark asset allocation ranges

The fund will be actively managed within the ranges below and the weightings of the underlying funds will be managed to closely align with the weightings between developed and emerging markets in the benchmark index.

Asset class	Benchmark asset allocation (%)	Range (%)
Cash and cash equivalents	0	0-5
International equities*	100	95-100

*Australasian equities may also be included as international equities in this fund.

Permitted investments

The fund can invest in any of the asset classes listed in the table above.

Derivatives

The fund (including any underlying managers if applicable) may use derivatives for the purpose of:

- protecting against risks such as unfavourable changes in an investment's price
- enhancing returns by taking advantage of favourable mispricing within a market, as a cost-effective alternative to purchasing physical assets
- implementing the investment objectives of the fund, and

¹ The fund invests indirectly fully into the MITNZ, see Investment Structure for further information.

- currency management.

The fund is also permitted to hold derivatives related to each asset class so long as the total market value exposure of each asset class (i.e., the physical plus the underlying derivative market value exposure) remains within the permitted asset allocation ranges.

Currency management

The fund targets a position of being 50% gross hedged to the New Zealand dollar with the hedges based on the currency weights of the underlying index. Currency hedges are normally rebalanced monthly but may be adjusted intra-month for significant cash flows. See page 30 “Hedging” for more information on funds for which the Fair Dividend Rate (FDR) taxation method is applicable but where these funds are not eligible to apply FDR to their foreign currency hedges and why these funds may therefore apply gross hedging.

Mercer Core Global Shares Fund

Description of the fund

The fund invests in shares listed on share markets predominately in developed economies. The portfolio uses multiple managers and is diversified by region, manager, and investment approaches. Environmental, Social and Governance characteristics are integrated into the underlying investment managers' investment processes.

For more information on sustainable investing, see the 'Sustainable Investment' section on page 33. Additionally, you can find our Sustainable Investment Policy at www.disclose-register.companiesoffice.govt.nz, located under the 'Documents' tab on the managed fund offer register for the Mercer Investment Funds.

Investment objectives

To provide a Gross Return above the return of the MSCI World Index with net dividends reinvested (in NZD) on a rolling three-year basis.

Investment strategy

Investment is in a diversified portfolio of international shares managed actively by multiple investment managers. The fund's exposure to global shares is through investment in PIE funds.¹

Benchmark asset allocation ranges

The benchmark asset mix noted below is the expected average asset mix of the fund over the long term. The fund will be actively managed within the given ranges:

Asset class	Benchmark asset allocation (%)	Range (%)
Cash and cash equivalents	0	0-10
International equities*	100	90-100

*Australasian equities may also be included as international equities in this fund.

Permitted investments

The fund can invest in any of the asset classes listed in the table above.

Derivatives

The fund (including any underlying managers if applicable) may use derivatives for the purpose of:

- protecting against risks such as unfavourable changes in an investment's price;
- enhancing returns by taking advantage of favourable mispricing within a market, as a cost-effective alternative to purchasing;
- physical assets;
- implementing the investment objectives of the fund; and

¹ The fund invests fully into the MITNZ, see Investment Structure for further information.

- currency management.

The fund is also permitted to hold derivatives related to each asset class so long as the total market value exposure of each asset class (i.e., the physical plus the underlying derivative market value exposure) remains within the permitted asset allocation ranges.

Currency management

The fund's foreign currency exposures are not hedged back to New Zealand dollars.

Mercer Core Hedged Global Shares Fund

Description of the fund

The fund invests in shares listed on share markets predominately in developed economies and is fully hedged to the New Zealand dollar. The portfolio uses multiple managers and is diversified by region, manager, and investment approaches. Environmental, Social and Governance characteristics are integrated into the underlying investment managers' investment processes.

For more information on sustainable investing, see the 'Sustainable Investment' section on page 33. Additionally, you can find our Sustainable Investment Policy at www.disclose-register.companiesoffice.govt.nz, located under the 'Documents' tab on the managed fund offer register for the Mercer Investment Funds.

Investment objectives

To provide a Gross Return above the return of the MSCI World Index with net dividends reinvested (100% hedged to the NZD on an after-tax basis) on a rolling three-year basis.

Investment strategy

The fund's exposure to global shares is through investment in the Mercer Core Global Shares Fund. The Mercer Core Global Shares Fund invests in a diversified portfolio of international shares managed actively by multiple investment managers. The fund's exposure to global shares is through investment in PIE funds.¹

Benchmark asset allocation ranges

The benchmark asset mix noted below is the expected average asset mix of the fund over the long term. The fund will be actively managed within the given ranges:

Asset class	Benchmark asset allocation (%)	Range (%)
Cash and cash equivalents	0	0-10
International equities*	100	90-100

*Australasian equities may also be included as international equities in this fund.

Permitted investments

The fund can invest in any of the asset classes listed in the table above.

Derivatives

The fund (including any underlying managers if applicable) may use derivatives for the purpose of:

- protecting against risks such as unfavourable changes in an investment's price;
- enhancing returns by taking advantage of favourable mispricing within a market, as a cost-effective alternative to purchasing;
- physical assets;

¹ The fund invests indirectly fully into the MITNZ, see Investment Structure for further information.

- implementing the investment objectives of the fund; and
- currency management.

The fund is also permitted to hold derivatives related to each asset class so long as the total market value exposure of each asset class (i.e., the physical plus the underlying derivative market value exposure) remains within the permitted asset allocation ranges.

Currency management

The fund targets a position of being 100% gross hedged to the New Zealand dollar with the hedges based on the currency weights of the underlying index. Currency hedges are normally rebalanced monthly but may be adjusted intra-month for significant cash flows. See page 30 “Hedging” for more information on funds for which the Fair Dividend Rate (FDR) taxation method is applicable but where these funds are not eligible to apply FDR to their foreign currency hedges and why these funds may therefore apply gross hedging.

Mercer Responsible Global Shares Fund

Description of the fund

The fund invests in shares listed on international share markets managed within a sustainable approach. This fund is managed to include specific additional responsible exclusions criteria which aims to avoid investments in certain companies or activities, and is managed with reference to environmental, social and governance factors. This fund has additional exclusions applied as described in our Sustainable Investment Policy and has been certified by the Responsible Investment Association of Australasia (RIAA).

See page 33, “Sustainable Investment” for information on the exclusions that apply to this fund. For more information on sustainable investing, you can find our Sustainable Investment Policy at www.disclose-register.companiesoffice.govt.nz, located under the 'Documents' tab on the managed fund offer register for the Mercer Investment Funds.

Investment objectives

To outperform the MSCI World Index with net dividends reinvested (50% hedged to NZD on an after-tax basis) on a rolling five-year basis.

Investment strategy

Investment is in a portfolio of predominantly global shares which is generally exposed to companies with a sustainable competitive advantage, across a range of markets. The fund takes a sustainable investment approach, which integrates environmental, social and governance factors.¹

Benchmark asset allocation ranges

The benchmark asset mix noted below is the expected average asset mix of the fund over the long term. The fund will be actively managed within the given ranges:

Asset class	Benchmark asset allocation (%)	Range (%)
Cash and cash equivalents	0	0-10
International equities*	100	90-100

*Australasian equities may also be included as international equities in this fund.

Permitted investments

The fund can invest in any of the asset classes listed in the table above.

Derivatives

The fund (including any underlying managers if applicable) may use derivatives for the purpose of:

- protecting against risks such as unfavourable changes in an investment's price;
- enhancing returns by taking advantage of favourable mispricing within a market, as a cost-effective alternative to purchasing;

¹ The fund invests fully into the MITNZ, see Investment Structure for further information.

- physical assets;
- implementing the investment objectives of the fund; and
- currency management.

The fund is also permitted to hold derivatives related to each asset class so long as the total market value exposure of each asset class (i.e., the physical plus the underlying derivative market value exposure) remains within the permitted asset allocation ranges.

Currency management

The fund targets a position of being 50% gross hedged to the New Zealand dollar. The hedges are based on the currency weights of the underlying index. Currency hedges are normally rebalanced monthly but may be adjusted intra-month for significant cash flows.

See page 30 “Hedging” for more information on funds for which the Fair Dividend Rate (FDR) taxation method is applicable but where these funds are not eligible to apply FDR to their foreign currency hedges and why these funds may therefore apply gross hedging.

Mercer Global Listed Real Estate Fund

Description of the fund

The fund invests in a global portfolio of property securities listed on stock exchanges around the world. It aims to generate medium to high returns over the long term by investing in a broad range of property regions, sectors, and securities through a single fund. Environmental, Social and Governance characteristics are integrated into the investment process.

For more information on sustainable investing, see the 'Sustainable Investment' section on page 33. Additionally, you can find our Sustainable Investment Policy at www.disclose-register.companiesoffice.govt.nz, located under the 'Documents' tab on the managed fund offer register for the Mercer Investment Funds.

Investment objectives

To provide a Gross Return above the FTSE EPRA/NAREIT Developed Total Return Index with net dividends reinvested (100% hedged to the NZD on an after-tax basis), on a rolling three-year basis.

Investment strategy

Investment is in a global portfolio of listed property securities in North America, Europe, Asia, and Australasia. Greater diversification is achieved by accessing a range of property companies and sectors not available in the New Zealand listed property market. Investment specialists on the ground are able to capitalise on local knowledge and identify the best opportunities in each region. There is a focus on property securities whose primary source of revenue is rental income.

Benchmark asset allocation ranges

The benchmark asset mix noted below is the expected average asset mix of the fund over the long term. The fund will be actively managed within the given ranges:

Asset class	Benchmark asset allocation (%)	Range (%)
Cash and cash equivalents	0	0-10
International listed property	100	90-100

Permitted investments

The fund can invest in any of the asset classes listed in the table above.

Derivatives

The fund (including any underlying managers if applicable) may use derivatives for the purpose of:

- protecting against risks such as unfavourable changes in an investment's price;
- enhancing returns by taking advantage of favourable mispricing within a market, as a cost-effective alternative to purchasing;
- physical assets;

- implementing the investment objectives of the fund; and
- currency management.

The fund is also permitted to hold derivatives related to each asset class so long as the total market value exposure of each asset class (i.e., the physical plus the underlying derivative market value exposure) remains within the permitted asset allocation ranges.

Currency management

The fund targets a position of being fully hedged to the New Zealand dollar.

Mercer Global Listed Infrastructure Fund

Description of the fund

The fund invests in infrastructure securities in both developed and emerging markets across a range of sectors. This provides access to a range of infrastructure sectors across geographic regions, with active portfolio management that seeks to target excess returns and predictable, stable cash flows. Environmental, Social and Governance characteristics are integrated into the investment process.

For more information on sustainable investing, see the 'Sustainable Investment' section on page 33. Additionally, you can find our Sustainable Investment Policy at www.disclose-register.companiesoffice.govt.nz, located under the 'Documents' tab on the managed fund offer register for the Mercer Investment Funds.

Investment objectives

To provide total returns (income and capital growth) after costs and before tax, above the FTSE Developed Core Infrastructure 50/50 Index with net dividends reinvested (100% hedged to the NZD on an after tax-basis), on a rolling three-year basis.

Investment strategy

The investment approach is research driven and seeks to identify and invest in high quality companies that are reasonably priced. The fund focuses on fundamental company and asset research. Companies targeted are those that own and operate infrastructure assets, derive most of their cash flow from those assets and have liquid market listings on major global stock exchanges. Investments are diversified across geographic regions and infrastructure sectors, with a focus on energy, transportation, communication, and water.

Benchmark asset allocation ranges

The benchmark asset mix noted below is the expected average asset mix of the fund over the long term. The fund will be actively managed within the given ranges:

Asset class	Benchmark asset allocation (%)	Range (%)
Cash and cash equivalents	0	0-10
Global infrastructure securities	100	90-100

Permitted investments

The fund can invest in any of the asset classes listed in the table above.

Derivatives

The fund (including any underlying managers if applicable) may use derivatives for the purpose of:

- protecting against risks such as unfavourable changes in an investment's price;
- enhancing returns by taking advantage of favourable mispricing within a market, as a cost-effective alternative to purchasing;

- physical assets;
- implementing the investment objectives of the fund; and
- currency management.

The fund is also permitted to hold derivatives related to each asset class so long as the total market value exposure of each asset class (i.e., the physical plus the underlying derivative market value exposure) remains within the permitted asset allocation ranges.

Currency management

The fund targets a position of being fully hedged to the New Zealand dollar with the hedges based on the currency weights of the underlying index. Currency hedges are normally rebalanced monthly but may be adjusted intra-month for significant cash flows.

Mercer NZ Shares Passive Fund

Description of the fund

The fund is a passively managed New Zealand shares portfolio that is designed to track the return of the S&P/NZX 50 Index. Environmental, Social and Governance characteristics are integrated into the underlying investment managers' investment processes.

For more information on sustainable investing, see the 'Sustainable Investment' section on page 33. Additionally, you can find our Sustainable Investment Policy at www.disclose-register.companiesoffice.govt.nz, located under the 'Documents' tab on the managed fund offer register for the Mercer Investment Funds.

Investment objectives

To provide a return that closely matches the return of the S&P/NZX 50 Index (on a gross basis and including imputation credits).

Investment strategy

Investment is in a passively managed low tracking error portfolio managed against companies listed on the S&P/NZX 50 Index.¹

Benchmark asset allocation ranges

Asset class	Benchmark asset allocation (%)	Range (%)
Cash and cash equivalents	0	0-5
Australasian equities*	100	95-100

*Australasian equities include any New Zealand domiciled listed or unlisted company, together with any non-New Zealand (including Australian) domiciled company with a listing on the New Zealand Stock Exchange. New Zealand shares also include futures and options on such shares.

Permitted investments

The fund can invest in any of the asset classes listed in the table above.

Derivatives

The fund is permitted to hold futures and options to assist in matching the returns of the benchmark index, subject to the market value of the exposure being covered by cash or backed by physical assets, with the total market exposure within the permitted allocation ranges above.

¹ The fund invests fully into the MITNZ, see Investment Structure for further information.

Mercer Responsible Hedged Global Fixed Interest Index Fund

Description of the fund

The fund is a passively managed international fixed interest portfolio that is designed to track the return of the Bloomberg MSCI Global Aggregate SRI Select ex-Fossil Fuels Index. This fund is managed to include specific additional responsible exclusions criteria which aims to avoid investments in certain companies or activities, and is managed with reference to environmental, social and governance factors. This fund has additional exclusions applied as described in our Sustainable Investment Policy and has been certified by the Responsible Investment Association of Australasia (RIAA).

See page 33, “Sustainable Investment” for information on the exclusions that apply to this fund. For more information on sustainable investing, you can find our Sustainable Investment Policy at www.disclose-register.companiesoffice.govt.nz, located under the 'Documents' tab on the managed fund offer register for the Mercer Investment Funds.

Investment objectives

To provide a return that closely matches the return of Bloomberg MSCI Global Aggregate SRI Select ex-Fossil Fuels Index (100% hedged to NZD on an after-tax basis).

Investment strategy

Investment is in a passively managed portfolio managed against companies listed on the Bloomberg MSCI Global Aggregate SRI Select ex-Fossil Fuels Index.

Benchmark asset allocation ranges

Asset class	Benchmark asset allocation (%)	Range (%)
Cash and cash equivalents	0	0-5
International fixed interest*	100	95-100

*International fixed interest may also include New Zealand fixed interest securities.

Permitted investments

The fund can invest in any of the asset classes listed in the table above.

Derivatives

The fund may use derivatives for currency hedging purposes.

Currency management

The fund targets a position of being fully hedged to the New Zealand dollar.

Mercer All Country Global Shares Index Fund

Description of the fund

The fund is a passively managed international shares portfolio that is designed to track the return of the MSCI All Country World ex Tobacco Index. Environmental, Social and Governance characteristics are integrated into the underlying managers' investment processes.

For more information on sustainable investing, see the 'Sustainable Investment' section on page 33. Additionally, you can find our Sustainable Investment Policy at www.disclose-register.companiesoffice.govt.nz, located under the 'Documents' tab on the managed fund offer register for the Mercer Investment Funds.

Investment objectives

To provide a return that closely matches the return of the MSCI All Country World ex Tobacco Index with net dividends reinvested (50% hedged to NZD on an after-tax basis).

Investment strategy

Investment is in a passively managed low tracking error portfolio managed against companies listed on the MSCI All Country World ex Tobacco Index.¹

Benchmark asset allocation ranges

Asset class	Benchmark asset allocation (%)	Range (%)
Cash and cash equivalents	0	0-5
International equities*	100	95-100

*Australasian equities may be included as International equities in the fund's asset allocation.

Permitted investments

The fund can invest in any of the asset classes listed in the table above.

Derivatives

The fund is permitted to hold derivatives related to each asset class so long as the total market exposure of each asset class (i.e., the physical plus the underlying derivative exposure) remains within the permitted asset allocation ranges above.

Currency management

The fund targets a position of being 50% hedged to New Zealand dollars, with the hedges based on the currency weights of the underlying index. Currency hedges are normally rebalanced monthly but may be adjusted intra-month for significant cash flows.

¹ The fund invests partially into the MITNZ, see Investment Structure for further information.

4. Investment Process

A summary of the key investment management processes, relevant to the Mercer Investment Funds, are set out below:

Setting the investment strategy

Mercer has established a range of Portfolios with different risk/reward profiles to suit the needs of a wide range of investors.

Mercer determines an appropriate investment strategy for the Mercer Investment Funds as a whole and for each individual Fund. Setting the investment strategy is a continual process that aims, first and foremost, to ensure alignment between agreed investment objectives and the structure of the individual Fund.

The methodology used by Mercer to develop the investment strategy for each Fund involves, as a first step, consideration of:

- expected risk and return relative to the Fund's objectives;
- the overall composition of the Fund's investments including the adequacy of diversification;
- the liquidity of selected investments having regard to expected cash flow requirements;
- availability and reliability of valuation information; expected tax consequences; and
- associated costs of investing and any other relevant matters.

The investment strategy is then formulated with reference to the Fund's risk and return objectives (plus the further considerations listed above) and in a manner that utilises the benefits of diversification within and between asset classes. The Fund's Benchmark Asset Allocations are then set and modelled on a continuing basis to assess their ongoing appropriateness in the light of expected market conditions and the asset allocation's ability to deliver on the particular Fund's investment objectives.

The investment strategy for each Fund is regularly reviewed to ensure an appropriate balance between risk and return and to maximise the likelihood of achieving the Fund's stated objectives. Asset allocation modelling is undertaken to assess the impact of potential changes on each Fund. Mercer formulates capital markets forecasts and employs proprietary modelling tools to support these processes.

This analysis is used to test the appropriateness of each Fund by estimating, among other metrics, the likelihood that the Fund will achieve its performance objectives, expected return, expected volatility and the probability of a negative return.

Mercer also stress-tests each Fund to assess how it might perform under different scenarios.

Reviewing the investment strategy

Mercer undertakes a formal strategy review at least every three years. Any recommended changes are supported by detailed analysis setting out the rationale for changes and the expected impact on Fund characteristics. In the interim, Mercer performs a “health check” which reviews the investment strategies for each Fund to gauge whether the agreed investment objectives and strategy remain appropriate and in the best interests of investors. At least one such health check is conducted in-between the formal triennial reviews.

Potential enhancements considered in formal reviews and health checks may include:

- the addition of a new asset class or a new type of investment;
- incorporation of new Mercer research;
- investment environmental factors including significant market events; and
- long-term market/industry trends and the outlook for growth.

The primary aim of any adjustment to a Fund’s investment strategy is to improve the balance between risk and return and maximise the chance of achieving the stated objectives.

Key considerations include:

- the degree of diversification;
- appropriate levels of liquidity, to facilitate daily pricing;
- availability of commercially attractive fees with an emphasis on value, via cost effective investment structures;
- transparency and reliability in asset valuation;
- the competitive environment, peer performance/offerings and investor demands; and product viability.

These investment strategies are reflected in the Benchmark Asset Allocation and ranges for each Portfolio, as set out in Section 3.

Strategic Asset Allocation

Strategic Asset Allocation (SAA) involves setting a Benchmark Asset Allocation for the long-term (but subject to reviews). Asset allocation may be adjusted with the aim of adding value to the performance of this Benchmark Asset Allocation through Dynamic Asset Allocation as described below.

Dynamic Asset Allocation

Dynamic Asset Allocation (DAA) is the process of actively adjusting and resetting the target asset allocations using a medium-term outlook, designed primarily for risk control, capital preservation, and incremental value-add.

DAA assessments are conducted on a regular basis and involve two stages. First, each asset class is assessed to determine whether it warrants being under or over-weighted based on a broad range of factors. Secondly, position size (i.e., the extent to which the asset class weight is 'tilted' within the benchmark ranges) is determined based on the level of conviction as to the expected value such tilts will add and dictates the Target Allocation. This DAA approach aims to produce a more stable pattern of returns for the relevant Fund, especially during unstable market periods.

Rebalancing Policy

Mercer rebalances the asset allocation of a Fund in order to maintain an actual asset allocation that is sufficiently close to that of the Target Asset Allocation for the Fund and in a manner that remains within the ranges permitted by this SIPO.

For each Fund and in the event that either the minimum or maximum asset allocation is exceeded (for example, as a result of market depreciation or appreciation or due to significant cash-flows), Mercer must, amongst other things, within 5 business days of being aware of the range being exceeded, re-weight the Fund to be within the permitted ranges. If the reweighting does not occur within this time frame, then Mercer must make a report to the Supervisor. Mercer is also required to provide quarterly reports to the Supervisor in connection with each Fund's adherence to its permitted asset allocation.

While market movement is one of the key triggers for rebalancing, other events that will invoke rebalancing include:

- a change in Mercer's Dynamic Asset Allocation views;
- a funding requirement for currency hedging gains/losses;
- the addition or deletion of new asset classes (typically as part of a broader review of investment strategy); and
- the receipt of large application/redemption requests (this is expected to be rare given the level of broad-based participation in the Scheme and the general long-term nature of the membership profile).

Hedging

Mercer considers currency hedging an essential part of any long-term investment strategy. Mercer also believes that an active approach to currency hedging is appropriate for some Funds and therefore manages the level of currency exposures in those Funds which are subject to the Dynamic Asset Allocation process (as described above). This implies that certain Portfolios will not maintain the same level of currency hedging at all times. Currency hedging is essentially protection against changes in currency exchange rates. Those overseas assets that are not hedged will have exposure to currency exchange rate movements resulting in a benefit when the New Zealand dollar goes down and decrease in value when the New Zealand dollar goes up.

Mercer sets a benchmark level of currency hedging for each overseas asset class. The Investment Manager must comply with these requirements. Where permitted, the Dynamic

Asset Allocation process, as detailed in Section 3, establishes the target level of currency exposure. This is then monitored using Mercer's daily cash flow model.

The Mercer Global Listed Infrastructure Fund and the Mercer Global Listed Real Estate Fund are eligible to apply FDR to their foreign currency hedges and therefore the gross up of the currency hedge is not required.

Manager Selection

Mercer focuses on selecting Investment Managers who are specialists within their particular investment markets and who have demonstrated capability and conviction in portfolio construction and the execution of investment strategies. A formalised process of screening potential managers, including a detailed assessment of their ability and performance, is coupled with on-going monitoring and formal performance reviews. The aim is to achieve a level of returns meeting or exceeding the objectives set, from time to time, for each Fund and which is consistent with the risk profile of each Fund.

Investment Structure

For each relevant fund (as noted in section 3) Mercer implements the current investment strategy for the fund by investing the fund's assets either wholly or partly into the Mercer Investment Trusts New Zealand (MITNZ).

The MITNZ is a series of wholesale unit trusts which incorporates a range of single sector and diversified multi-sector portfolios. Mercer (N.Z.) Limited is the manager of MITNZ. The trustee of MITNZ is Trustees Executors Limited. MITNZ is governed by the MITNZ Trust Deed, SIPO and Information Memorandum.

In its capacity as the Manager of the fund, Mercer is responsible for determining and selecting the appropriate MITNZ products to achieve the objectives of the fund.

The MITNZ trusts are currently invested in a mix of:

- portfolio of securities managed by Investment Managers under delegation and governed by investment management agreements with Mercer. The securities managed are held under a segregated mandate managed by the relevant Investment Manager;
- Funds managed by Mercer entities, including Mercer Australia's multi-manager funds; and
- Managed funds offered and managed by other Investment Managers.

5. Investment Performance Monitoring Policy

The various components of the investment monitoring process are outlined below.

The principal goals of investment performance monitoring are to:

- monitor the returns of each Fund relative to its investment objectives nominated in Section 3 Fund Investment Strategies and Objectives;
- assess the extent to which the Fund's investment objectives are being achieved and are expected to be achieved going forward;
- monitor the performance of individual asset classes against suitable industry standard benchmark indices and, particularly the asset class indices outlined in Section 3 Fund Investment Strategies and Objectives;
- monitor investment risks associated with each Fund and ascertain the existence of any particular weaknesses/concerns with the investment strategy, Investment Manager or the Investment Manager's products utilised; and
- allow Mercer to continually assess the ability of each Investment Manager to successfully meet the objectives set for that manager.

Mercer is responsible for reviewing the performance of the appointed Investment Managers. Such monitoring is undertaken on a regular basis. Factors taken into account in these reviews will include investment style, resources, organisational strength, investment performance relative to objectives, product structure, and any other factors considered relevant to the Investment Manager's continuing ability to meet the applicable investment objective. Returns will also be compared with returns earned by a suitable peer group, such as a group of other professional investment managers.

Reporting on performance against each Fund's objectives and compliance with benchmarks is monitored on a monthly basis. Exceptions, including unexpected performance dispersion or negative outcomes are highlighted in this reporting, and any recommended remedial actions are noted.

6. SIPO Review and Monitoring

SIPO Review

The SIPO is to be reviewed annually although reviews may be completed before this time. In the event of a material change to the purpose of the Scheme or a major event impacting the Scheme's investments, Mercer may consider an earlier review.

Any review will be carried out by Mercer in conjunction with the Supervisor, where appropriate, and will consider the investment objectives of the Scheme and take account of any changes to the Funds being offered and the investment outlook which may affect the relative value and role of the different asset classes. Mercer is responsible for approving the SIPO but will give prior written notice of any proposed changes to the Supervisor.

SIPO Amendments

The SIPO may be altered by Mercer from time to time subject to the requirements of the Financial Markets Conduct Act 2013 (FMCA). Mercer may amend or replace this SIPO only after giving prior written notice to the Supervisor. Mercer must provide a copy of the SIPO (or any alteration to the SIPO) to the Supervisor as soon as reasonably practicable prior to the SIPO or alteration taking effect and must lodge the SIPO as required by the FMCA.

Availability of this SIPO

The most current version of this SIPO is available on the register entry for the Scheme on the Disclose website at www.disclose-register.companiesoffice.govt.nz.

7. Key Investment Policies

Sustainable Investment

At Mercer New Zealand, we take our Sustainable Investment Policy into account when managing our investments, believing that sustainable investment approaches are consistent with an objective to create and preserve long-term investment capital, where relevant and aligned with achieving investment objectives.

The Sustainable Investment Policy for Mercer New Zealand is available at <https://www.multimanager.mercer.co.nz/funds/environmental-social-governance-policies.html> and on the Disclose register.

Our Sustainable Investment Policy is informed by our global philosophy and principles, link [here](#), and our local experience implementing and evolving our sustainable investment approach for over a decade.

We have principles to guide our implementation approach, summarised into four techniques:

- Integration of environmental, social and governance (ESG) factors in relevant investment decisions may potentially enhance portfolio resilience. This includes appointing third party investment managers (Investment Managers) who assess and reflect ESG risks and opportunities when they select investments and construct their portfolios.
- Stewardship, via engagement with Investment Managers, companies and policymakers and/or via proxy voting at listed company annual general meetings, may improve investment outcomes by leveraging investor rights and influence. Engagement may be undertaken with companies or policymakers via Investment Managers, collaborative initiatives and/or directly by us.
- Exclusions that seek to avoid investment in, or remove exposure as much as practicable to, certain companies or securities with involvement in defined products or business activities may help respond to stakeholder expectations where integration and stewardship are considered to be insufficient.
- Investment in themes, which is only applicable to the Sustainable Global Credit allocation in the Mercer Responsible Balanced Fund (refer to the Sustainable Investment Policy section on Investment in Themes), may provide additional opportunities to improve risk-adjusted returns.

Refer to the **Sustainable Investment Policy** for more information about these principles and implementation techniques.

At the date of this SIPO, the following funds have been certified by Responsible Investment Association Australasia (RIAA) according to the operational and disclosure practices required under the Responsible Investment Certification Program.¹

The table below outlines the exclusions criteria that apply with further exclusions information below the table and in the Mercer Sustainable Investment Policy.

Mercer Investment Funds (MIF)	RIAA Certification ¹	Applicable Exclusions Criteria	Applicable Additional Exclusions Criteria – Responsible	Applicable Additional Exclusions Criteria - Sustainable
Mercer Responsible Balanced Fund	✓	✓	Listed Equities, Global Fixed Income and NZ Bonds	Global Credit
Mercer Responsible Trans-Tasman Shares Fund	✓	✓	Equities	
Mercer Responsible Global Shares Fund	✓	✓	Equities	
Mercer Responsible Hedged Global Fixed Interest Index Fund	✓	✓	Global Fixed Income	

Exclusions

Exclusions involve seeking to avoid investing in, or removing exposure as much as practicable to, certain companies with involvement in defined products or business activities.

Exclusions can be used to respond to evolving societal norms and expectations, including New Zealand Government policy positions, especially where Integration and Stewardship are considered to be insufficient or not applicable.

Exclusions are typically implemented as rules-based, pre-defined criteria such as the Exclusions Criteria set out below.

Our application of exclusions is generally determined by the asset class and nature of the holdings, and are subject to the operational limitations and exceptions detailed below.

Exclusions only apply to Directed Investments. If a Directed Investment meets an Exclusions Criteria, our Investment Managers will generally be expected to divest the Directed Investment in a reasonable period of time, typically within 10 business days and as market conditions allow. We may rely on specialist third party ESG providers and their methodologies for implementation, including determining which securities to be excluded based on the relevant Fund's Exclusion Criteria (see below).

¹ The Responsible Investment Certification Program does not constitute financial product advice. Neither the Certification Symbol nor RIAA recommends to any person that any financial product is a suitable investment or that returns are guaranteed. Appropriate professional advice should be sought prior to making an investment decision. RIAA does not hold an Australian Financial Services Licence and does not hold a Financial Services Provider licence in New Zealand. RIAA's RI Certification Symbol signifies that a product or service offers an investment style that takes into account environmental, social, governance or ethical considerations. The Symbol also signifies that the funds listed above adheres to the operational and disclosure practices required under the Responsible Investment Certification Program for the category of Product. The Certification Symbol is a Trademark of the Responsible Investment Association Australasia (RIAA). Detailed information about RIAA, the Symbol and the fund's methodology, performance and stock holdings can be found at www.responsibleinvestments.com.au, together with details about other responsible investment products certified by RIAA.

Exclusions Criteria

Investment Managers are required to apply the following exclusions to the Directed Investments of the Funds ('Exclusions Criteria'), unless an operational limitation or exception as noted below, or other factors beyond our reasonable control, mean it is not reasonably feasible or would be impracticable to apply the exclusions.

Exclusion	Exclusions Criteria
Controversial weapons	Companies that manufacture whole weapons systems, or delivery platforms, or key components that were developed or are significantly modified for use in cluster munitions, anti-personnel landmines, biological or chemical weapons or nuclear weapons. Companies with involvement* in the production or retailing of automatic or semi-automatic civilian firearms or ammunition.
Tobacco	Companies with involvement* in the production of tobacco, manufacture of nicotine alternatives or tobacco-based products (regardless of revenue), including subsidiaries and joint ventures. Nicotine alternatives and tobacco-based products include, for example, nicotine vaping products such as 'vaping' devices and e-cigarettes. Any other company that derives greater than 50% of revenue^ from tobacco-related distribution, wholesale or retail, and services such as marketing or supplying products necessary for production.
Russian assets#	Defined as: <ul style="list-style-type: none"> Sanctioned Russian entities and related entities of sanctioned entities; Shares – issues of publicly held companies with Russia as the country of incorporation or where the security has a primary listing in Russia (including ADRs/GDRs), including their subsidiaries Fixed income – issuers captured in equity screening (as above) by country of incorporation, plus Russian sovereign bonds and bonds issued by Russian government-related entities (Rouble or foreign currency denominated); Cash holdings in Russian currency; Russian FX exposure; Private markets assets domiciled in Russia; All secondary issues of excluded securities; and Derivatives having a Russian asset as primary exposure.

* Involvement is determined by a third party ESG research provider, currently ISS ESG, typically assessed based on revenue derived from defined activities (no revenue thresholds) or in the case of expansion metrics assessed based on capital expenditure.

^ Revenue is gross revenue in the last full financial year or, where not available, net revenue based on available company filings.

Mercer New Zealand has instructed its investment managers to divest any existing exposure to Russian securities as market conditions allow and to prohibit any new investments in Russian securities. This may mean that some Funds still retain exposures to Directed Investments in Russian securities, as Mercer New Zealand seeks to divest in a manner that promotes the best interests of investors.

Additional Exclusions Criteria

Further to the exclusions listed in the Exclusions Criteria section above, additional exclusions also apply for the funds labelled with Responsible.

Applying Additional Exclusions Criteria may affect investment risks and returns where, for example, there are exclusions to investments in companies that are not typically excluded in other funds. If those excluded companies perform well or poorly in certain time periods, there may be differences in return outcomes compared to a benchmark or comparable fund where those exclusions are not applied.

The Additional Exclusions listed below apply to the Directed Investments of some asset classes – equities and global credit - for the Responsible Funds ('Additional Exclusions') within certain revenue thresholds, unless exceptions (as noted below) or other factors beyond Mercer's control mean they are not possible to apply.

Other Fixed Income, Overseas Sovereign Bonds and New Zealand Sovereign Bonds asset classes do not have the below Additional Exclusions.

These **Responsible Additional Exclusions** for Responsible labelled **Equities** and **Global Bonds** are defined as:

Responsible Additional Exclusion	Responsible Additional Exclusions Criteria
Coal, oil, or gas	<p>Companies with involvement* in the following as defined by Global Industry Classification Standard (GICS) sub-industry:</p> <ul style="list-style-type: none"> • Oil & Gas Drilling • Oil & Gas Equipment & Services • Integrated Oil & Gas • Oil & Gas Exploration & Production • Thermal Coal & Consumable Fuels. <p>Companies that own proved or probable reserves in coal, oil, or gas; and derive in excess of 15% of their revenue[^] from exploration and extraction of thermal coal, oil or gas. Where referred to above, 'coal, oil or gas' includes these fuels where derived from conventional and unconventional sources such as tar sands or shale.</p>
Adult entertainment	Companies with greater than 10% of revenue [^] from adult entertainment-related business activity (adult entertainment-related activities mean production, distribution and not accessible to minors as defined by third-party data provider).
Alcohol	Companies with greater than 10% of revenue [^] from alcohol-related business activities (alcohol-related activities mean production, distribution and services to the production of alcoholic beverages alcohol as defined by third-party data provider).
Gambling	Companies with greater than 10% of revenue [^] from gambling-related business activities (gambling-related activities mean production, services and distribution of gambling products as defined by third-party data provider).
Depleted uranium	Companies with involvement* in the development or production of depleted uranium ammunition/armour.

* Involvement is determined by a third party ESG research provider, currently ISS ESG, typically assessed based on revenue derived from defined activities (no revenue thresholds) or in the case of expansion metrics assessed based on capital expenditure.

[^] Revenue is gross revenue in the last full financial year or, where not available, net revenue based on available company filings.

The following **Sustainable Additional Exclusions** apply and are limited to **Sustainable Global Credit** in which the Mercer Responsible Balanced Fund invests:

Sustainable Additional Exclusion	Additional Exclusions Criteria for Sustainable Global Credit
Nuclear weapons	Companies with involvement* in the development or production of nuclear weapons.
Depleted uranium	Companies with involvement* in the development or production of depleted uranium ammunition/armour.
Tobacco	Companies that derive greater than 10% of revenue [^] from tobacco-related distribution, wholesale or retail, and services such as marketing or supplying products necessary for production.
Cannabis	Companies that derive greater than 10% of revenue [^] from cannabis (medicinal or recreational) production, distribution or services.

Saudi Arabia	Saudi Arabian securities, defined by country of incorporation or where the security has a primary listing in Saudi Arabia, including subsidiaries.
Adult entertainment	Companies with a material exposure to adult entertainment, alcohol or gambling, where materiality is defined as greater than 10% of revenue [^] from production and/or distribution, wholesale or retail, and services such as marketing or supplying products necessary for production.
Alcohol	
Gambling	
Live animal exports	Companies that derive greater than 10% of revenue [^] from live animal export for the purpose of selling live animals for slaughter, husbandry and breeding subjects, including specialised transportation services specifically designed to facilitate live exports.
Animal fur production	Companies that derive greater than 5% of revenue [^] from fur production.
Thermal coal mining	Companies that derive greater than 5% of revenue [^] from thermal coal mining.
Oil sands production	Companies that derive greater than 5% of revenue [^] from oil sands production.
Fossil fuels	Companies that own proved or probable reserves in coal, oil or gas and derive greater than 15% of revenue [^] from exploration and/or extraction of coal, oil, or gas; or companies with a primary business activity in any of the excluded sub-sectors below: <ul style="list-style-type: none"> • Oil & gas drilling • Oil & gas equipment & services • Integrated oil & gas • Oil & gas exploration & production • Thermal coal & consumable fossil fuels. • Where referred to above, 'coal, oil or gas' includes fuels derived from conventional and unconventional sources such as tar sands or shale.

* Involvement is determined by a third party ESG research provider, currently ISS ESG, typically assessed based on revenue derived from defined activities (no revenue thresholds) or in the case of expansion metrics assessed based on capital expenditure.

[^] Revenue is gross revenue in the last full financial year or, where not available, net revenue based on available company filings.

The Exclusions Criteria and Additional Exclusions listed in the above pages are current as at the date of this SIPO and changes may occur from time to time.

The latest Exclusions Criteria and Additional Exclusions can be found here www.multimanager.mercer.co.nz.

The above is a summary of exclusions under the Sustainable Investment Policy and exceptions may apply. Details of exceptions are found in the Sustainable Investment Policy for Mercer New Zealand which is available at www.disclose-register.companiesoffice.govt.nz, located under the 'Documents' tab on the managed fund offer register for the Mercer Investment Funds.

Liquidity Management

Mercer maintains a liquidity management plan which describes the principles and processes governing liquidity management within the investment strategies of the Funds.

Mercer's policy in regard to the liquidity of the Funds is to ensure that all Funds are able to meet their obligations, including having available funds to meet:

- member withdrawals and transfers between Funds;
- fees and expenses;
- taxation payments; and

- re-balancing requirements

Liquidity is available through each Fund holding suitable levels of liquid assets, being investment in cash and listed securities. Liquid assets are typically those assets that can be redeemed in 30 days in “normal” conditions without materially moving the price.

The procedures used by Mercer to manage liquidity for the Funds address the following key areas:

- the daily liquidity monitoring process which aims to proactively identify any potential liquidity issues;
- liquidity stress testing which considers a range of factors that may impact on liquidity, including market movements and forecasted cash flow requirements; and
- the maintenance of a range of tools to respond to a liquidity event (depending on the severity and duration of the event).

Mercer also believes that unlisted investments and Alternatives, which can be less liquid, can have an important, but limited, role to play by diversifying sources of risk and return. Mercer has carefully considered the liquidity demands of each Fund before permitting some unlisted investments and Alternatives to be included within appropriate Funds.

Derivatives

The use of derivatives within the Funds is intended to contribute to the efficient and appropriate realisation of fund objective. Further, the use of derivatives is governed by Mercer’s Derivatives Policy which provides detail on the use and control of derivatives and the processes that are in place for assessing compliance with these controls.

Borrowing and leveraging

For all funds borrowing is permitted up to 10% of the funds value for events such as:

- transaction settlement mismatches
- if a client withdraws from the fund and there is a mismatch in the redemption of the underlying assets; and
- to cover shortfalls due to payment of expenses and fees. For the Mercer Australian Property Index Fund leveraging is restricted to directly held assets within the fund and will not exceed 10% of total assets of the fund. For all other funds, leveraging is not allowed.

Pricing and valuation policy

The pricing and valuation of fund assets is outsourced to BNP Paribas Fund Services Austrasia Pty Ltd (BNP Paribas) who is responsible for the pricing and valuation of the assets. All assets are priced by BNP Paribas via their pricing data providers. This achieves segregation of duties as the Manager does not have its own interest in the funds' assets and there is no conflict of interest.

BNP Paribas values the fund assets in accordance with its own pricing policy as well as a price source agreement as agreed between Mercer and BNP Paribas.

Whilst pricing and valuation is outsourced to BNP Paribas, the Manager is ultimately responsible for the pricing and valuation of the Mercer Investment Funds.

Conflict of Interest/Related Parties

Conflicts Management Policy

Mercer has a Conflicts Management Policy to ensure that Mercer maintains effective systems, controls, and procedures to identify and manage conflicts in accordance with our stated principles and to provide for appropriate oversight of conflicts and their management.

This enables Mercer to manage the business effectively whilst also meeting customer and other stakeholder expectations; adhering to regulatory requirements; and operating in accordance with the Marsh McLennan Code of Conduct.

Further information is available in the Conflicts of Interest section of the Other Material Information document on the Disclose register.

Related party transactions

The Manager conducts all transactions with related parties of the Scheme in accordance with the rules on related-party transactions that apply to managed investment schemes under the FMC Act.

The general rule under the FMC Act is that the Manager (and any investment manager, administration manager, or other person to whom the Manager has contracted some or all of its manager functions) of a scheme is prohibited from entering into a transaction that provides for a related party benefit to be given.

The FMC Act provides an exemption to this rule whereby the Manager can enter into a transaction that provides for a related party benefit if the Manager:

- notifies the supervisor of the transaction, the related party benefits given under that transaction, the key terms of the transaction; and
- either:
 - the transaction is 'permitted' and the Manager certifies to the supervisor to this effect; or
 - the Manager obtains the supervisor's consent to the transaction.

For more information on the rules on related-party transactions that apply to managed investment schemes under the FMC Act go to <https://www.fma.govt.nz/library/guidance-library/related-party-transactions-under-the-financial-markets-conduct-act-2013/>

8. Glossary

“Alternative Assets” means investments that are not included in the traditional asset classes of cash, fixed income, and shares. Depending on the alternative assets’ characteristics and suitability they may substitute in the Fund for either income or growth assets. Alternative assets may include (but are not limited to) private equity, forestry, infrastructure, carbon offset credits, social bonds, social or environmental impact and other developing asset types with a sustainable investment focus.

“Directed Investments” are investments where we can direct and control our exposure to individual securities via our Investment Managers, including through individually managed portfolios of securities. Directed Investments do not include our investments in pooled vehicles (including managed investment schemes and exchange traded funds) where the manager or trustee is external to Mercer NZ, and where we cannot direct or control our exposure to individual securities within the pooled investment. Directed Investments also do not include some forms of derivatives and related parties pooled vehicles, as described further in the Sustainable Investment Policy.

"FMC Act" means the Financial Markets Conduct Act 2013.

“Gross Return” means the return before the deduction of tax, expenses and fees and assumes all income is reinvested.

“Mercer Investment Funds” means the Mercer Responsible Balanced Fund, Mercer Income Generator Fund, Mercer Macquarie NZ Cash Fund, Mercer Macquarie NZ Fixed Interest Fund, Mercer Macquarie NZ Short Duration Fund,

Mercer Responsible Trans-Tasman Shares Fund, Mercer Responsible Global Shares Fund, Mercer Global Shares Fund, Mercer Core Global Shares Fund, Mercer Core Hedged Global Shares Fund, Mercer Global Listed Real Estate Fund, Mercer Global Listed Infrastructure Fund, Mercer NZ Shares Passive Fund, Mercer Responsible Hedged Global Fixed Interest Index Fund, Mercer All Country Global Shares Index Fund and.

“Private debt” refers to debt financing provided by non-bank institutions to companies or individuals, offering customized financing solutions outside of traditional bank lending.

“Real Assets” include listed property, listed infrastructure, unlisted property, and unlisted infrastructure. These assets are expected to generate returns that are different to shares, and therefore offer increased diversification to the relevant Portfolio.

“Responsible Funds” means the Mercer Responsible Global Shares Fund, Mercer Responsible Balanced Fund, Mercer Responsible Trans-Tasman Shares Fund, and the Mercer Responsible Hedged Global Fixed Interest Fund.

“Supervisor” means The New Zealand Guardian Trust Company Limited.

“Sustainable Investment Policy” means the Policy that applies to the Scheme available at www.multimanager.mercer.co.nz

“Trust Deed” means the Mercer Investment Funds Trust Deed (as amended and restated).

Appendix 1

The below table shows the fund names that were changed 31 October 2025

Previous fund name	Current fund name
Mercer Macquarie Global Listed Infrastructure Fund	Mercer Global Listed Infrastructure Fund
Mercer Macquarie Global Listed Real Estate Fund	Mercer Global Listed Real Estate Fund

The below table shows the fund names that were changed on 1 December 2025

Previous fund name	Current fund name
Mercer Sustainable Balanced Fund	Mercer Responsible Balanced Fund

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