



Milford KiwiSaver Plan
Statement of Investment Policy & Objectives

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Investment Policy
& Objectives

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Part A: The Milford KiwiSaver Plan

1. Introduction

This Statement of Investment Policy and Objectives ('SIPO') is for the Milford KiwiSaver Plan ('Plan'). The Plan is a managed investment scheme under the Financial Markets Conduct Act 2013 ('FMCA').

There are three funds in total (each a '**Fund**')

1. Milford Conservative Fund ('KiwiSaver Conservative Fund').
2. Milford Balanced Fund ('KiwiSaver Balanced Fund').
3. Milford Active Growth Fund ('KiwiSaver Active Growth Fund').

The Funds are all managed by Milford Funds Limited ('Milford', the 'Manager', 'we', 'our', or 'us').

The Manager is responsible for administering each Fund within the Plan and selecting and managing its investments.

The Supervisor of the Plan is Trustees Executors Limited ('Supervisor') and is responsible for the supervision of the Plan and the Manager in relation to the Plan. The Supervisor is independent of the Manager.

The Plan is an investment structure where the Supervisor (or a custodian appointed by the Supervisor) holds the assets of the Plan for the benefit of all members who hold units in the Plan ('Members'). We make the investment management decisions but the assets of each Fund are held separately from, and independent of us and the other Funds.

A Member will receive units in the Plan in whichever Fund(s) they choose to invest in.

The Plan is a portfolio investment entity ('PIE') for tax purposes.

2. Investment philosophy

As investment markets are in a state of constant change, Milford adopts an active approach to investing. This allows Milford to take advantage of investment opportunities as they arise, and seek to provide a level of capital protection when markets are less favourable.

The key principles that underpin our philosophy are:

1. We adopt an active portfolio management approach.
2. We adopt a more defensive approach to seek to provide a degree of capital protection in less favourable markets and take a more aggressive investment approach when our view of markets is more positive.
3. We are committed to undertake investment research of the assets we invest in and conduct regular company visits.
4. We seek to understand the changes in the local and global economic environments and how these changes are likely to impact the markets in which our clients' assets are invested.
5. We seek to manage risk through appropriate portfolio diversification.
6. We focus on key competencies and in instances where we lack specific skills and knowledge, we engage with organisations that can provide these for us.
7. We view our role as partial 'owners' of the companies in which we invest on behalf of our clients. As such, we take an active interest in the corporate governance of many of these entities.

3. Investment Strategy Development, Policies and Processes

Overarching Investment Policy

The overarching investment policy is to invest the assets of each Fund:

- a. according to the investment objectives and parameters described in this SIPO; while
- b. complying with:
 - i. all applicable laws; and
 - ii. the requirements of the trust deed ('Trust Deed'), and disclosure documents.

Developing and modifying the investment strategies for each Fund

We empower the Portfolio Managers of each Fund to individually develop investment strategies that best fit the objectives and risk tolerance of each individual Fund.

In developing and amending investment strategies, the Portfolio Managers will, as a minimum, take the following steps:

1. Consider the investment objectives of the Fund

The investment objectives of each Fund outline the primary financial goals of the Fund, taking into account the Fund's return objectives and its tolerance for risk, providing the overarching parameters for the investment strategy.
2. Define the asset class makeup of the Fund

Given the defined investment objectives and risk tolerance of each Fund, the Portfolio Managers formulate the mix of asset classes, and the diversification of these, that will make up the Fund. The Portfolio Managers define ranges for each asset class, establishing the limits to which they

can alter the mix of asset classes within the Fund. Milford's Investment Committee must approve the creation of, and changes to, all asset allocation ranges.

As outlined in Part B of this document, Milford provides broad asset allocation ranges for each Fund, enabling Portfolio Managers to take a dynamic and active approach to managing the Funds.

3. Consider permitted investments

Portfolio Managers will consider permitted investments for the Funds, which are outlined in Part B of this document.

Portfolio Managers may decide to invest in other investments (which are not explicitly stated in the list of permitted assets of each asset class of the SIPO) that Milford considers fall within the parameters of permitted investments and that appropriately reflect the risk profile and performance objective of the Fund. Where necessary, in accordance with the Trust Deed, the Manager will seek the approval of the Supervisor when doing so.

4. Consider any need for the selection of external Fund Managers

We will determine whether we have the expertise and capability internally to manage the entire Fund to the stated objectives and asset mix, or whether a portion of the Fund will be best managed through appointing a specialist external fund manager.

5. Consider after taxation returns

In setting the investment strategy, we will consider the tax arrangements that will apply to the Fund to assess the potential after-tax as well as pre-tax returns for the Fund and its members.

6. Consider the use of derivatives (including short selling)
We invest in derivatives to the extent permitted in each Fund, with the intention of reducing our exposure to market risks or increasing our exposure to market positions we believe will improve the performance of our Funds.

7. Develop a strategy for currency hedging

We believe in active currency management to control risk and add value to our Funds. For each Fund, a neutral investment position is established, based on the risk adjusted return relative to the Fund's objective. We have tactical ranges around this neutral position, within which changes to the hedging position can be made. We may take an active currency position around the neutral position to reflect our view on key drivers for the currency.

8. Consider all of our other investment policies

The investment policies summarised below are also considered in developing and modifying our investment strategy for a Fund.

Liquidity and Cash Flow Management

The Funds should have sufficient liquidity to meet ongoing short term operational requirements, for example but not limited to;

- i. settlement of securities purchased
- ii. settlement of derivatives including foreign currency hedges
- iii. anticipated levels of fund withdrawals

We may from time to time dictate liquidity requirements relating to Funds.

Counterparty Risk Policy

Counterparty exposure is defined as parties with whom we have a trading or banking relationship (not just a security investment).

Exposure to a given counterparty is considered for each Fund by aggregating the following:

- Current accounts
- Term deposits
- Derivative exposures
- Securities exposure
- Allowance for intraday custodial flows
- Any other relevant exposure

Exposure limits are with reference to the lower of the credit ratings provided by S&P and Moody's.

Asset Concentration Policy

This policy is to ensure that the concentration risk, both by security and investment class, within the Funds is appropriate for the risk profile of those Funds. Asset class limits for the Funds are set out in Part B of this document.

Trade Execution and Trade Allocation Policy

This policy and our compliance procedures and controls ensure that we are able to act in the best interests of all our investors through equitable trade allocation and execution practices. All equity trading activity is conducted through our Central Dealing Desk, which optimises execution of trades for the Funds in the markets we operate in and supports compliant trading practices through a central point of control.

Trades are allocated so as to avoid one Fund receiving a preferred trade allocation over another Fund. All trades require an appropriate rationale and are implemented in accordance with documented procedures. Our trading system produces regular reports on trade allocations and executions which are monitored.

Voting and Responsible Investment Policy

This policy ensures that Milford exercises proxy voting rights wherever possible and endeavours to understand the governance, social and environmental impact of our investment decisions.

Unit Pricing and Valuation Policy

As a key operating principle, we require that unit prices and valuations be calculated by an independent external party with agreed appropriate methodologies and controls in place. Our unit pricing and valuation policy accordingly adopts the matching unit pricing and asset valuation policies of our administration manager, MMC Limited ('MMC').

Portfolio valuations are derived by applying local and international closing market prices to each security held by a Fund. MMC's pricing methodology delivers updated unit prices for the close of business each day.

External Manager Policy

This policy sets out the criteria for monitoring external managers. All external funds across all asset classes that Milford invests in need to meet the requirements of the policy.

For all external funds, limits are established and monitored with respect to maximum allowable exposure and other criteria under this policy.

4. Investment Process

Milford's Investment Team follows the process outlined on the right in developing and finalising investment decisions. Milford's investment process involves conducting our own proprietary research. We undertake analysis of the macro-economic environment as well as a fundamental analysis of the industries and individual entities within our investment universe.

Our macro-economic analysis, via the monitoring and analysis of economic data, aims to identify changes to the prospects of particular asset classes and industries.

Our fundamental analysis aims to identify the best opportunities within identified asset classes and industries for investment. We aim to meet with a large number of companies each year across a wide range of industries to discuss with management their prospects.

When considering individual companies, we seek to understand key value drivers for an investment including; the company's competitive position and industry structure, the quality and sustainability of earnings, and the quality and strength of the Board and senior management.

Milford's Investment Forum meeting brings together all of our research where investment ideas are formally presented and debated for potential implementation by the Portfolio Managers. The Investment Forum aims to promote collaboration on investment decisions and leverage the extensive industry experience and knowledge, both in New Zealand and overseas, held amongst the team. The Portfolio Managers are responsible for final selection of the securities to include within a portfolio.



Within the investment strategy formulated for each Fund in accordance with the steps outlined in section 3 above, Portfolio Managers make individual investment decisions by following a process that includes the elements described below.

1. Tactical Asset Allocation and Rebalancing

We empower Portfolio Managers of individual Funds with the autonomy to make tactical asset allocation decisions within the asset allocation ranges outlined for each Fund. Portfolio Managers make these investment decisions on an active and continuous basis to improve the risk-adjusted returns of the Funds.

We do not automatically rebalance asset classes to targets. However, Portfolio Managers actively review positions in light of asset class targets and targets are periodically reviewed as part of the SIPO review process (see Section 7).

We actively monitor the Funds to ensure that investment authority limits are not breached. In cases where these limits are breached, we will take action to rebalance the Fund's portfolio in line with the authorised asset ranges.

2. Investment Research and Execution

The core investment process is outlined on the previous page. This process leverages Milford's expertise and industry knowledge to maximise the opportunities for the success of the Funds.

3. Stress Testing

Stress testing of all investment portfolios will be undertaken no less than every three years unless there is a major market movement. These tests simulate how the investment makeup of each Fund will respond to a series of unfavourable market scenarios.

The outcomes of these tests are used as inputs to the development and refinement of investment strategies and tactical investment decisions.

4. Investment Policies

In making investment decisions, Portfolio Managers ensure all such decisions are in compliance with these investment policies. See Section 3 above for a summary of these policies.

Please contact us should you wish to view any of the policies outlined in this document in full.

5. Conflicts of Interest

This section sets out information about any conflict of interest that could reasonably be expected to materially influence the investment decisions in our role as Manager of the Plan.

Background

Milford is a wholly owned subsidiary of Milford Asset Management Limited ('Milford Asset Management').

Directors of Milford may also be directors of Milford Asset Management. All staff involved with the Plan are employed and remunerated by Milford Asset Management. These relationships have the potential to create an inherent conflict of interest.

Milford Asset Management provides the people and the infrastructure to Milford in order for Milford to carry out the investment management on its own accord, as manager of the Plan.

Funds affected

All Funds in the Plan are affected by the potential conflict of interest.

How conflicts may or could materially influence our investment decisions

Milford, as Manager of the Plan, has an incentive to invest into other Milford funds ahead of funds managed by external fund managers or investment managers. When the Plan is invested in other Milford funds, the relevant Fund will be fully rebated for any management fees charged by that other Milford fund (to ensure there is no “double-dipping” of management fees by us).

However, those rebates do not extend to any performance fees charged (if any) by that other Milford fund.

Management of conflicts of interest

The FMCA imposes the following statutory controls on conflicts of interest:

1. A related party transaction in respect of a Fund may only be entered into if the transaction(s) is notified to the Supervisor and:
 - a. we certify the transaction(s) is “permitted” on the basis that the transaction(s) is:
 - i. on arms-length terms;
 - ii. on terms that were less favourable terms to the related party; or
 - iii. is another type of transaction permitted under the FMCA and the Financial Markets Conduct Regulations 2014; or
 - b. we obtain the Supervisor’s consent to the transaction(s).

2. As Manager of the Plan, we are subject to various statutory duties in the performance of our duties as manager, including the requirement to act honestly and in the best interests of Members.
3. Where we contract out our functions to other parties, our liability for the performance of those functions is not affected and we must take reasonable steps to ensure the persons to whom we contract those functions perform them in the same manner and are subject to the same duties and restrictions as if we were performing them directly. These include the statutory duties referred to above. We must also monitor the performance of the parties that carry out contracted functions.
4. We, as Manager of the Plan, must comply with a professional standard of care and must exercise the care, diligence and skill that a prudent person engaged in the profession would exercise in the same circumstances. The same professional standard also applies to all our Funds’ external fund managers.
5. Milford Asset Management and its subsidiaries (‘Milford Group’) have established a Staff Trading Policy. To avoid any personal conflict, staff can only invest in Milford products (except in markets where these products do not invest), and staff are not permitted, under any circumstances, to take an investment opportunity away from Members.

Code of conduct and directors’ Code of Ethics

Milford Group has a code of conduct that all staff are expected to follow. This includes a requirement to avoid conflicts of interest and disclose and discuss with management where any potential conflicts may arise or have arisen.

Milford Asset Management has a Code of Ethics that sets out the expectations on the directors of Milford Asset Management entities that includes potential conflicts of interest and how they should be dealt with.

Conflicts of interest policy

Milford Group's conflicts of interest policy sets out what a conflict of interest is and how to avoid or manage it. The conflicts of interest policy also describes the following:

- conflict of interest and procedures relating to dealing with related parties;
- identification of potential conflicts of interest and potential related party transactions;
- assessment and treatment of conflicts of interest and related party transactions; and.
- Milford Group's gifts, hospitality and expenses policy.

Milford Group's approach to conflicts of interests is to consider each potential conflict on its own merits and then to:

- recognise the conflict;
- discuss with management;
- assess the impact of the potential conflict;
- avoid (if possible) or manage the conflict; and.
- disclose the conflict.

Any conflict of interest is also recorded in a central database for conflicts of interest and reviewed on a regular basis.

We have also discussed and will have in place a process with the Supervisor for identifying, notifying and certifying or obtaining consent for related party transactions as required by the FMCA.

6. Investment Governance and Monitoring

The responsible oversight body for ensuring adherence to the SIPO is a committee of the Milford Asset Management Board ('Investment Committee'). The Investment Committee meets regularly and senior members of the Investment and Business teams, attend the Investment Committee.

The objective of the Investment Committee is to assist the Milford Board to discharge its responsibilities in relation to investment oversight including the Plan's portfolio structures, performance and risk.

An investment performance report containing the key performance considerations (listed below) is presented to the Investment Committee at each of their meetings. Performance is analysed as per the following time periods: one month, one quarter, six months, one year, three years, five years and since inception (both absolute and per annum). More frequent or specific reporting occurs if the Investment Committee or the Milford Board believes this is appropriate given specific market or Fund developments.

Key considerations are as follows:

- a. relative investment performance of Funds to their benchmarks and appropriate peers (funds with similar objectives and risk-return profiles);
- b. fund attribution – reasons for under/over performance, relative to performance benchmarks;
- c. market experience – performance of the Fund relative to expectations in the actual market and economic environment;
- d. risk-adjusted performance – whether there is sufficient added value to justify additional risk;

- e. portfolio structure and risk – includes but not limited to risk-return ratios, liquidity, concentration, counterparty risk, turnover, appropriateness of benchmarks and the SIPO;
- f. consistency with all stated restrictions, the SIPO and mandate guidelines including compliance with applicable laws and regulations;
- g. the relevant investment process and conduct;
- h. that appropriate stress testing is undertaken in relation to the performance of investment strategies; and
- i. the way the Funds are managed and invested is in accordance with all product disclosures and Fund risk is accurately disclosed.

7. SIPO Compliance and Review

The following procedures are in place in regard to monitoring compliance with this SIPO:

1. All SIPO related policies (including hedging policy) investment parameters, restrictions and ranges are monitored as appropriate by the Manager.
2. Where possible these parameters, restrictions and ranges are built into our investment management system compliance module to provide pre and post trade monitoring and beginning of day warnings and alerts. Trade alerts need approval to be overridden.
3. Where parameters, restrictions and ranges cannot be built into the investment system, a member of our Operations Team (separate from the Investment Team) prepares a daily report, which is reviewed.
4. A report of the SIPO parameters, restrictions and ranges is prepared as at each month end and reviewed quarterly by the Investment Committee.

The Supervisor has reviewed this SIPO and any material amendments are made in consultation with the Supervisor and recommended by the Investment Committee to the Milford Board.

We will give the Supervisor prior notice of any changes to the SIPO in accordance with the Trust Deed and the FMCA.

The SIPO is updated when any changes to a Fund are made that affect its existing objectives and parameters. A standing agenda item is in place at every Investment Committee meeting to assess the ongoing accuracy of the information included within the SIPO and ensure that its existing objectives or parameters continually remain up to date.

The SIPO is updated based on any relevant changes to factors impacting a Fund. Such changes might include, but are not limited to, new permitted investments, asset classes or investment policy changes, and any fundamental changes in the market environment or to any Fund's investment objectives.

The Manager performs an annual review of the SIPO.

This annual review includes, but is not limited to, the following considerations:

- legal and regulatory changes;
- market practice; and
- Portfolio Manager recommendations and product considerations (including any overarching changes to investment philosophy and process or the investment environment).

The review also considers the appropriateness of asset class ranges and all investment policies.

Key stakeholders (being the Supervisor, Investment Committee and the Milford Board) formally review any recommended change to the SIPO from this review and provide written consent.

A summary of how changes can be made to the SIPO for each Fund, including whether investors will be notified of those changes and how investors can otherwise obtain information about those changes can be found in the Product Disclosure Statement.

To view the full range of regulatory and product disclosure details for any of our Funds you can go to www.milfordasset.com/documents.

Alternatively, you can go directly to the Disclose Register, an online register maintained by the Registrar of Financial Service Providers which holds the offer documents for all financial products, including the current version of this document, at www.companiesoffice.govt.nz/disclose.

Part B: Fund Specific Objectives and Parameters

PART B: FUND SPECIFIC OBJECTIVES AND PARAMETERS

This section provides information that is specific to each of our Funds. The benchmark asset allocation represents the mix of assets we intend to invest in, under typical market conditions in the relevant Fund. This may also be referred to as a target investment mix in this document (and in any PDS or Fund Update). It also contains target investment ranges for each asset class for each Fund.

To respond to market conditions and opportunities, Milford will actively alter the asset mix of its Funds on an ongoing basis, potentially to the full limits of the SIPO ranges.

Description of Permitted Assets in each Asset Class

The asset classes that each Fund can invest in are outlined in the table below. A description of the permitted assets within each of the permitted asset classes is provided in the table below.

Description of Permitted Assets in each Asset Class

Asset Class	Description of Permitted Assets
Cash and Cash Equivalents	Cash at bank.
New Zealand Fixed Interest	New Zealand based fixed interest securities, loans, and other yield bearing investments.
International Fixed Interest	Fixed interest securities, loans, and other yield bearing investments based outside of New Zealand.
Australasian Equities	New Zealand and Australian based equity and equity-like listed and unlisted securities including ordinary, preference and partly paid shares, convertible securities, warrants, exchange-traded funds (ETFs) and options.
International Equities	Equity and equity-like listed and unlisted securities including ordinary, preference and partly paid shares, convertible securities, warrants, exchange-traded funds (ETFs) and options - based outside of Australia and New Zealand.
Listed Property	Equity and equity-like listed securities in companies operating primarily in the property sector including ordinary, preference and partly paid shares, convertible securities, warrants, exchange-traded funds (ETFs) and options.
Unlisted Property	Unlisted equity and equity-like securities in companies operating primarily in the property sector including ordinary, preference and partly paid shares, convertible securities, warrants and options.
Commodities	Equity-like listed securities in commodities including futures and options.
Other	Other investments that do not meet the criteria of the above categories, as determined by Milford and agreed with the Supervisor.

Please note: Any derivatives based on respective Permitted Assets are included as Permitted Assets for that category. The permitted assets in each asset class mentioned above can extend to investments in pooled or unitised funds.

Short-selling, use of Derivatives and use of Currency Hedging

		Ability to short-sell (1)	Ability to borrow (2)	Ability to use derivatives	Foreign Currency Exposure		
					Neutral exposure	Exposure range	
						Min	Max
KiwiSaver	Conservative	Yes	No	Yes	0%	-10%	10%
	Balanced	Yes	No	Yes	15%	-10%	50%
	Active Growth	Yes	No	Yes	9%	-10%	50%

1. Short selling refers to the ability of funds to short sell individual stocks. This is limited to 25% of the Fund's net asset value.

2. While the funds are not allowed to borrow, they may invest into other funds that have the right to borrow.

Target Investment Mix and Ranges

	Asset Classes	Cash and Cash Equivalents			New Zealand Fixed Interest			International Fixed Interest			Australasian Equities			International Equities		
		Target	Min	Max	Target	Min	Max	Target	Min	Max	Target	Min	Max	Target	Min	Max
KiwiSaver	Conservative	6%	0%	100%	35%	0%	100%	41%	0%	100%	6%	0%	20%	8%	0%	20%
	Balanced	8%	0%	100%	8%	0%	65%	23%	0%	40%	31%	0%	40%	24%	0%	50%
	Active Growth	6%	0%	70%	4%	0%	20%	10%	0%	20%	62%	20%	100%	18%	0%	25%

	Asset Classes	Listed Property (1)			Unlisted Property			Commodities			Others		
		Target	Min	Max	Target	Min	Max	Target	Min	Max	Target	Min	Max
KiwiSaver	Conservative	4%	0%	20%	0%	0%	10%	0%	0%	2%	0%	-20%	20%
	Balanced	6%	0%	20%	0%	0%	7%	0%	0%	10%	0%	-10%	10%
	Active Growth	0%	0%	20%	0%	0%	15%	0%	0%	10%	0%	-20%	20%

Targets indicate what are expected to apply over the course of an economic cycle, and should be considered as general only. Milford is an active manager and may at times deploy investment strategies that differ (within the allowable minimum and maximum bounds) materially from the above targets.

1. Any target for Listed Property is based on a specific decision to hold listed property as against incidental exposure from investing in equity markets. If there is no specific target to hold listed property, the asset class as shown here includes listed property equity holdings only (excludes listed property debt securities).

Note that if the Fund can use leverage or borrow this will be represented in gross assets data. In this scenario the upper ranges of asset classes may be exceeded.

Target Growth – Defensive Investment Mix and Range Limits

	Asset Classes	Growth Assets (1)			Income Assets (2)			Total Unlisted Equities (3)	Net long position (4)	Gross exposure (5)
		Target	Min	Max	Target	Min	Max	Max	Max	Max
KiwiSaver	Conservative	18%	0%	20%	82%	80%	100%	5%	110%	110%
	Balanced	61%	25%	75%	39%	25%	75%	5%	110%	125%
	Active Growth	80%	20%	100%	20%	0%	80%	12%	125%	125%

Targets indicate what are expected to apply over the course of an economic cycle, and should be considered as general only. Milford is an active manager and may at times deploy investment strategies that differ (within the allowable minimum and maximum bounds) materially from the above targets.

1. Growth Assets are defined as Australasian Equities, International Equities, Listed Property, Unlisted Property, Commodities and Other.
2. Income Assets are defined as Cash and Cash Equivalents, New Zealand Fixed Interest, and International Fixed Interest.
3. Total Unlisted Equities are unlisted equity holdings included within Australasian Equities only.
4. The Net long position reflects total long exposures (positions which benefit from a rise in security value) less total short exposures (positions which benefit from a decline in security value). Net long position can exceed 100% through the use of derivatives, or through the ability to borrow or leverage the fund.
5. The Gross exposure reflects gross long positions plus gross short positions.

Schedule 1. Milford KiwiSaver Conservative Fund

Fund objective and description

The Milford Conservative Fund's objective is to provide a moderate return and protect capital after management and administration charges but before tax over the minimum recommended investment timeframe.

It is a diversified fund that primarily invests in fixed interest securities, with a moderate allocation to equities.

Minimum recommended investment timeframe

Three years.

Relevant performance benchmark

A performance benchmark is not applicable to the Milford Conservative Fund.

Relevant market index

Asset Class	Benchmark Index	Benchmark Asset Allocation
Cash and Cash Equivalents	S&P/NZX Bank Bills 90-Day Index	5%
New Zealand Fixed Interest	S&P/NZX Investment Grade Corporate Bond Total Return Index	31%
International Fixed Interest	S&P/ASX Corporate Bond 0+ Total Return Index (100% NZD-hedged)	31%
International Equities	5% x S&P/NZX Bank Bills 90-Day Index + 95% x MSCI World Index with net dividends reinvested (100% NZD-hedged)	8%
Investment in underlying multi-asset fund via: Milford Income Wholesale Fund	Milford Diversified Income Fund's Market Index	25%

Please see the Compilation of Market Index Constituents for further information on the Milford Diversified Income Fund's Market Index. This can be found at www.milfordasset.com/documents.

Schedule 2. Milford KiwiSaver Balanced Fund

Fund objective and description

The Milford Balanced Fund's objective is to provide capital growth after management and administration charges but before tax and before the performance fee over the minimum recommended investment timeframe.

It is a diversified fund that primarily invests in equities, with a significant allocation to fixed interest securities.

Minimum recommended investment timeframe

Five years.

Relevant performance benchmark

A performance benchmark is not applicable to the Milford Balanced Fund.

Relevant market index

Asset Class	Benchmark Index	Benchmark Asset Allocation
Cash and Cash Equivalents	S&P/NZX Bank Bills 90-Day Index	3%
New Zealand Fixed Interest	S&P/NZX Investment Grade Corporate Bond Total Return Index	2%
International Fixed Interest	S&P/ASX Corporate Bond 0+ Total Return Index (100% NZD-hedged)	2%
	1/3 x BofA Merrill Lynch Global Large Cap Corporate Index (100% NZD-hedged) + 1/3 x BofA Merrill Lynch 1-5 Year BB US High Yield Index (100% NZD-hedged) + 1/3 x Bloomberg AusBond Credit BBB- to BBB+ Index (100% hedged to NZD internally)	4%
	S&P/NZX 50 Gross Index with Imputation Credits	7%
Australasian Equities	S&P/ASX 200 Accumulation Index (in NZD)	3%
	S&P/ASX Small Industrials Accumulation Index (100% NZD-hedged)	5%

International Equities	10% x S&P/NZX Bank Bills 90-Day Index + 90% x MSCI World Index with net dividends reinvested (60% NZD-hedged)	24%
Investment in underlying multi-asset fund via: Milford Income Wholesale Fund	Milford Diversified Income Fund's Market Index	40%
Milford Active Growth Fund	Milford Active Growth Fund's Market Index	10%

Please see the Compilation of Market Index Constituents for further information on the Milford Diversified Income Fund's Market Index and the Milford Active Growth Fund's Market Index. This can be found at www.milfordasset.com/documents.

Schedule 3. Milford KiwiSaver Active Growth Fund

Fund objective and description

The Milford Active Growth Fund's objective is to provide annual returns of 10% after management and administration charges but before tax and before the performance fee, over the minimum recommended investment timeframe.

It is a diversified fund that primarily invests in Australasian equities, with a moderate allocation to international equities and fixed interest securities.

Relevant market index

Asset Class	Benchmark Index	Benchmark Asset Allocation
Cash and Cash Equivalents	S&P/NZX Bank Bills 90-Day Index	6%
New Zealand Fixed Interest	S&P/NZX Investment Grade Corporate Bond Total Return Index	4%
International Fixed Interest	S&P/ASX Corporate Bond 0+ Total Return Index (100% NZD-hedged)	2%
	1/3 x BofA Merrill Lynch Global Large Cap Corporate Index (100% NZD-hedged) + 1/3 x BofA Merrill Lynch 1-5 Year BB US High Yield Index (100% NZD-hedged) + 1/3 x Bloomberg AusBond Credit BBB- to BBB+ Index (100% hedged to NZD internally)	8%
	S&P/NZX 50 Gross Index with Imputation Credits	36%
Australasian Equities	S&P/ASX 200 Accumulation Index (100% NZD-hedged)	10%
	S&P/ASX Small Industrials Accumulation Index (100% NZD-hedged)	16%
International Equities	5% x S&P/NZX Bank Bills 90-Day Index + 95% x MSCI World Index with net dividends reinvested (50% NZD-hedged)	18%

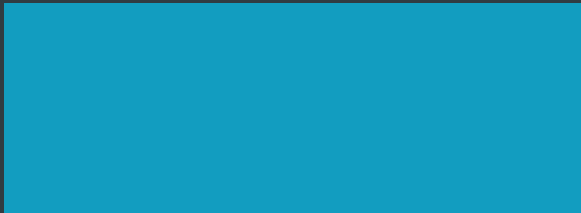
Minimum recommended investment timeframe

Five years.

Relevant performance benchmark

Positive annual returns of 10% (after management and administration charges but before tax and before the performance fee).

This benchmark is used to assess the payment of performance fees.



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