



10 October 2018

Dear [REDACTED]

REQUEST UNDER THE OFFICIAL INFORMATION ACT 1982

Thank you for your request to the Guardians of New Zealand Superannuation (“**Guardians**”) dated 21 September 2018 made pursuant to the Official Information Act 1982 (“**OIA**”).

Your Request

You have requested the following information:

“Information on the funding of the NZ Super Fund to the Israeli gvt/embassy/anything linked to Israel.”

Our Response

Sovereign Bond Holdings

The table below is a compilation of our data showing the Fund’s holdings of Israeli sovereign bonds. This data is based on our latest closed month end position of the 31 August 2018. We hold a total of NZD6,248,319.88 in Israeli sovereign bonds.

SecuritySubTypeCode CountryOfIssueDescr	Sovereign Israel			
SecurityLongName	Currency	ISIN	Units	MV NZD
Israel (State Of) 1% Bds 30/04/2021 IIs1	ILS	IL0011381303	350,000	148,275.78
Israel (State Of) 1.75% Snr 31/08/25 IIs1000	ILS	IL0011355570	6,000,000	2,515,365.22
Israel (State Of) 2% Bds 31/03/2027 IIs10000	ILS	IL0011393449	300,000	127,162.62
Israel (State Of) 3.75% Bds 31/03/24 IIs1000	ILS	IL0011308488	400,000	191,097.75
Israel (State Of) 5.5% Bds 31/01/22 IIs1000	ILS	IL0011232720	3,000,000	1,491,645.24
Israel (State Of) 5.5% Bds 31/01/42 IIs1000	ILS	IL0011254005	100,000	61,198.76
Israel (State Of) Tbond 1.5% 18/01/2027	EUR	XS1551294256	300,000	545,409.56
Israel St Bd 2.875% Due 03-16-2026 Reg	USD	US46513CXR23	500,000	728,275.12
State Of Israel Bd 4.125% Due 01-17-2048reg	USD	US46513YJJ82	300,000	439,889.83
Grand Total				6,248,319.88

Equities

We publish a full list of the Fund’s equity holdings on our external website here: <https://www.nzsuperfund.nz/publications/annual-equity-listings>. The latest list is 2017, with our 2018 listing due to be published on the 11th October. You will see that our equities are listed by country.

Exclusions

In 2012 the Guardians excluded from the Fund a small number of Israeli companies because of their involvement in the construction of Israeli settlements on the Separation Barrier in the Occupied Palestinian Territories. The decision followed findings by the United Nations that the West Bank Separation Barrier and settlement activities were illegal under international law. We also factored in votes by New Zealand for UN Security Council resolutions demanding the cessation and dismantling of

the Separation Barrier, and the cessation of Israeli settlement activities in the Occupied Palestinian Territories.

In deciding whether a company is in breach of the Fund's responsible investment standards and how material that breach is, we take account of the proximity and importance of the company's actions, and our ability to engage with the company to change its business or practices. We draw a distinction between being directly and materially involved in an activity, versus being a supplier of materials or services in the normal course of business.

I refer you also to the following media statements:

- New Zealand Superannuation Fund excludes three companies on responsible investment grounds, December 2012
- NZ Super Fund investment in Israel Chemicals, August 2014
- NZ Super Fund statement on Israel/Palestine, August 2014

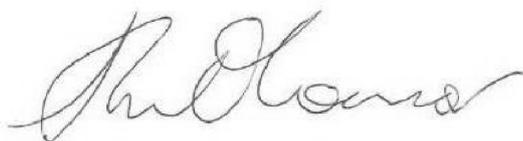
The Guardians' Responsible Investment framework is available on our website here: <https://www.nzsuperfund.nz/how-we-invest/responsible-investment>. The framework guides all of our responsible investment decision making and activities, including our exclusion decisions.

General

Your request was worded broadly. We have endeavoured to provide all material information, however, if you would like to discuss this further over the phone in order to refine your request (if necessary) we are happy to do so. Please contact my colleague Isabelle Brunton on ibrunton@nzsuperfund.co.nz.

You have the right to seek a review of our response by the Ombudsmen's Office. Please also note that we may choose to publish our response to your request on www.nzsuperfund.co.nz.

Yours sincerely,



Anne-Maree O'Connor
Head of Responsible Investment
Guardians of New Zealand Superannuation