
HEALTH AND SAFETY POLICY PUNAKAIKI FUND LIMITED

30 July 2020

V1.0

1. INTRODUCTION

- 1.1. Punakaiki Fund Limited (“PFL”) is an investor in high-growth New Zealand based companies. It is structured as a New Zealand limited company and has contracted LWCM Limited (the “Manager”) as its external management company. This document sets out PFL’s Health and Safety Policy.
- 1.2. Legislation, such as the Health and Safety at Work Act (2015) (“HSWA”), the Employment Relations Act (2000), the Privacy Act (1993), the Harassment Act (1997) and the Human Rights Act (1993) set out a business’ responsibility to provide a healthy work environment. This policy is based on that legislation and applies to all employees, contractors and staff of PFL, as well as to anyone who visits or otherwise enters PFL’s workplace.

2. OFFICER RESPONSIBILITIES

- 2.1. PFL has no employees, and outsources the performance of almost all of its business undertakings to the Manager. Nevertheless, HSWA obligations cannot be outsourced, and the PFL Board of Directors remains ultimately responsible for understanding and managing key risks to ensure that PFL, through its Manager, fulfils its health and safety responsibilities.

Understanding Key Risks

- 2.2. The PFL Board is responsible for maintaining relevant, up-to-date knowledge of workplace health and safety, and for understanding the nature of PFL’s business, operations and associated health and safety risks in general.

Managing Key Risks

- 2.3. PFL requires that the Manager has a Health and Safety at Work Policy in place, which is sufficiently robust to ensure that:
 - a) the Manager has appropriate resources and processes to eliminate or minimise risks to health and safety for LWCM;

- b) the Manager has appropriate resources and processes for receiving, considering and responding in a timely way to information about incidents, hazards, and risks;
 - c) the Manager has appropriate resources and processes for complying with its own and PFL's duties under the HSWA; and
 - d) the use of these resources and processes can be verified.
- 2.4. PFL requires that the Manager undertakes reasonable endeavours to cause, where reasonably practical but in particular where PFL has director appointment rights, each portfolio company to have appropriate health and safety procedures in place.
- 2.5. PFL shall review and approve the Manager's Health and Safety at Work Policy at whenever it is updated by the Manager and in any event, at least every two years. PFL may also carry out checks on an ad hoc basis to ensure and verify that policy's robustness.
- 2.6. The Health and Safety at Work Policy of the Manager, as approved by the PFL Board, is attached at Appendix A.

3. **REVIEWS**

- 3.1. This Policy shall be reviewed:
- a) every second year, on or near to the second anniversary of the previous review; and
 - b) may be reviewed more frequently as considered appropriate by the Board.

Version	Date Adopted
V1.0	23 July 2020

30 July 2020

PUNAKAIKI FUND

ENGAGE • INVEST • GROW • HOLD

**APPENDIX A: LWCM HEALTH AND SAFETY AT WORK
POLICY**

[AS ATTACHED]