




TUPUTONU  
Ngāpuhi Investment Fund

E.107

# TUPU TONU

**STATEMENT  
OF INTENT**

For the period  
1 July 2025 to 30 June 2029



Ko ngā maunga hakahī e taiāwhio ana i te Whare Tapu ō  
Ngāpuhi, e hiki ana i te tāhūhū ki te tiketiketanga ō te  
taumata ō te rangi, kia ahuru nei ngā uri hakatupu ō Rāhiri te  
tupuna kia haumaru te noho, ka tarehua. E mihi ana ki te  
whenua, e tangi ana ki ngā tāngata katoa.

Korohīhī pō, korohīhī ao. Ko rongo i tūria ki te matahau ō Tū  
te winiwini, ō Tū te wanawana, ō Tū kia whakaputaina i te  
wheiao kia puta ki te Ao mārama. Ka tīhewā, mauriora.

Presented to the House of Representatives pursuant to section 149 of the Crown Entities Act 2004.

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# STATEMENT FROM THE BOARD

*E ngā mana, e ngā reo, e ngā kārangatanga maha, ngā mihi maioha ki a koutou katoa.*

The Board of the Ngāpuhi Investment Fund Limited trading as Tupu Tonu is pleased to present the Statement of Intent (SOI) for the period 1 July 2025 to 30 June 2029. This SOI has been prepared by the Board of Directors (the Board) pursuant to the Crown Entities Act 2004.

In the five years since establishment, we have adopted a strategy to grow the value of the fund through the acquisition of whenua-based assets and interests primarily within Northland. We continue to build on our foundations and grow a portfolio in line with good investment practice, taking an intergenerational outlook.

Recent research shows significant growth in the Māori asset base from \$69 billion in 2018 to \$126 billion in 2023, with a commensurate increase in the Māori contribution to the New Zealand economy from \$17 billion to \$32 billion over the same timeframe. This growth reflects the efforts, vision and strategic investment of Māori businesses and communities. Tupu Tonu is well placed to reflect these insights in the development of its portfolio.

We have diversified our investments in sectors such as energy and infrastructure, forestry, primary industries, and commercial property. This diversification strengthens the resilience and adaptability of the fund for long term strategic growth.

We look forward to continuing to execute our investment approach and providing opportunities for Ngāpuhi to become familiar with and understand our portfolio.

We also look forward to further rounds of disbursements from the profits of our investments being made to Ngāpuhi uri. Disbursements are a way to build the capability and capacity of Ngāpuhi to enter a prosperous post-settlement future.

The Board is honoured to be responsible for growing a portfolio of high performing assets that will provide options for Ngāpuhi and the Crown to consider in the context of future Tiriti settlement negotiations.



Ben Dalton

Chair

30 June 2025



Lindsay Faithfull

Deputy Chair

30 June 2025

# WHO WE ARE

We are an independent Crown-owned investment company, whose purpose is to establish and manage an investment portfolio which is intended to support any future agreements between Ngāpuhi and the Crown in historical Tiriti o Waitangi settlement negotiations.

## **Our name**

Tupu Tonu broadly translates to ‘prosperity in perpetuity’, but the two words have deeper cultural significance. One of the names by which Ngāpuhi is known is Ngāpuhi-nui-tonu, or everlasting Ngāpuhi. Tupu Tonu speaks of continuity and stability and speaks to the inclusiveness and multiplicity of tribal groups and marae within Ngāpuhi. Accordingly, we take an intergenerational approach to investment for long-term growth and prosperity.

## **Our Board**

The Crown Entities Act 2004 sets out the role of boards as the governing body of statutory entities. All decisions relating to the operations of a statutory entity must be made by, or under the authority of the board. The board must ensure that we act in a manner consistent with our objectives, functions, current statement of intent, and current statement of performance expectations.

Our Board is appointed by shareholding Ministers and has five independent members, currently:

- Ben Dalton (Chair)
- Lindsay Faithfull (Deputy Chair)
- Ripeka Evans
- Sarah Petersen
- Geoff Taylor

## **Our people and organisation**

We are a small organisation. Achieving our long-term purpose and strategic objectives, requires strong leadership; a shared understanding of our Vision and Values; and talented, committed people.

We have recruitment, professional development and remuneration policies that focus on attracting and retaining skilled, flexible, efficient and knowledgeable people.

We are committed to being a zero-harm employer with no days lost to incident and have policies to encourage staff participation in health and safety. Regular observations are undertaken to identify hazards and unsafe workplace practices and any training required will be provided as appropriate. Any notifiable event will be reported to the Chief Executive and Board Chair immediately.

As an employer, we:

- offer a flexible working environment that enables staff to balance work and other commitments in line with government guidance;
- support staff to learn and develop their investment and commercial knowledge and skills, as well as build leadership and cultural capability, according to their individual needs;
- are committed to upholding our responsibilities as an Equal Employment Opportunities (EEO) employer and creating a workplace that attracts, retains and values diverse employees; and
- have a zero-tolerance approach to all forms of harassment and bullying and has policies in place to deal with harassment and bullying complaints.

These measures are focused on ensuring we have a productive work environment and a culture where staff are supported.

## WHY WE EXIST

We were established as an independent Crown-owned company in February 2021. Settlement between the Crown and Ngāpuhi has faced a range of obstacles for decades. Our creation recognised the lack of suitable Crown-owned land and assets in the Northland region that could be offered as commercial redress. While Ngāpuhi claims remained unsettled, opportunities for Ngāpuhi to purchase assets were being lost and unlikely to be available again within the foreseeable future. Our establishment was an innovative solution to this issue.



Photo: Rawhitiroa Photography

# WHAT WE DO

Our constitution<sup>1</sup> sets out our purpose as being to acquire and manage a portfolio of assets that collectively:

- support any future agreements that may be entered into by the Crown in relation to the historical Treaty of Waitangi claims of Ngāpuhi; and
- grow the value of the Tupu Tonu investment portfolio.

Other secondary factors the company must take into account in giving effect to its purpose are to:

- operate as a responsible investor;
- to the extent possible, take a best practice approach to investment management; and
- to the extent possible, make investments that encourage and facilitate economic development in the Ngāpuhi rohe.

Our objective is to seek profitability in the long term. We are not expected to distribute profits to shareholders in the short to medium term.

## *Our approach to investing*

We are a direct investment fund. We seek to primarily invest in tangible assets and businesses, as opposed to indirect investments such as managed funds, listed equities, and listed debt securities. We take an intergenerational view towards acquiring and managing a portfolio of assets.

Shareholding Ministers expect our investments to fall into one of two investment portfolios:

- a primary investment portfolio for the acquisition of commercial assets in Northland; and
- a secondary investment portfolio comprising any other investments, for the purpose of growing the value of the Fund.

Primary portfolio investments can:

- include assets and businesses with some operations/assets outside Northland, as long as there are material operations/assets in Northland; and
- include publicly-listed shares in operations domiciled in Northland, provided Tupu Tonu does not acquire a controlling interest.

We have a whenua-based strategy which focuses the investment direction of the Fund on investing in land and its productive uses in Northland. This includes a range of whenua-based strategic sectors such as energy and infrastructure, primary industries, and commercial property.

<sup>1</sup> The Tupu Tonu constitution can be found by searching the New Zealand Companies Register online at <https://companies-register.companiesoffice.govt.nz/>

### Investment Model

We are flexible in our investment model and are interested in both co-investment models (such as partnering) and full ownership - where the investment can be managed appropriately.

Our investment parameters provide a foundation for the Fund's investment strategy.

### Investment Parameters

Area	Investment Setting
Purpose	To develop a portfolio of commercial assets that <ul style="list-style-type: none"><li>• could be made available by the Crown to Ngāpuhi during settlement negotiations; and</li><li>• grows the long-term value of Tupu Tonu.</li></ul>
Values	<ul style="list-style-type: none"><li>• Kaitiakitanga</li><li>• Rangatiratanga</li><li>• Manaakitanga</li><li>• Hihiri</li></ul>
Legal form	A Limited Liability Company, listed under Schedule 4A of the Public Finance Act 1989
Initial capital	\$150 million
Investment approach	Commercial investor Direct investment
Time horizon	Intergenerational investments
Geography	Primarily invest in Northland
Liquidity	Hold sufficient capital in cash or cash equivalents with three months or less maturity
Borrowing	Nil - currently prohibited under the Crown Entities Act
Distributions	No distributions to shareholders, however up to 10% of Tupu Tonu's cash investment returns are used to fund disbursements to Ngāpuhi
Taxation status	We are exempt from income tax
Best practice	<p>The Fund will apply best practice approaches to each direct investment considered. This includes investing on a commercial basis in respect of individual investments (returns are commensurate with risks).</p> <p>This does not mean deploying the capital purely based on maximum excess returns.</p>
ESG/ Responsible Investment	Our vision and values guide our approach to incorporate ESG factors, and as such we are committed to acting as a responsible investor.

### **Investment Criteria**

We seek to acquire assets with a typical investment size of \$2-\$15 million. We predominately look to either directly own or take an equity ownership when investing. Each investment should meet the following initial investment screening criteria:

- Be commercial in nature;
- Not be unduly high-risk in nature (for example pre-revenue or unproven technologies);
- Achieve market returns;
- Be within Northland; and
- Reflect our responsible investing approach.

Tupu Tonu has a secondary aim of contributing to economic growth in the Northland region. This means when focusing on our commercial investment objectives, we also consider downstream socio-economic benefits of the potential investment.

### **Exclusions**

We are a long-term commercial investor

Our investment approach excludes pre-revenue and pre-profit venture capital investments, grants, feasibility studies, research and development or any investment in breach of its responsible investing approach outlined below.

We cannot invest outside of New Zealand.

### **Risk Management**

We are committed to maintaining an acceptable risk profile. Our core purpose is to build and grow a performing portfolio of commercial assets that could be offered to Ngāpuhi as part of a Treaty Settlement.

We manage risk effectively by actively identifying and managing, designating and monitoring key risks. We don't seek to avoid risks at all costs, but rather to carefully weigh the opportunities and risks associated with our decisions and our business activities from a well-informed perspective.

Opportunities to generate income or increase the value of assets under management are considered, and risks should be assumed only if they remain within appropriate limits acceptable to us.

We consider investment risk through due diligence and investment management approaches. We adopt a proactive, shared culture of risk identification, assessment, and action to ensure risk management is integrated into our business practices and decision-making.

We have set the target rate of return and risk tolerance of our investment portfolio. In general, we have a balanced approach to risk and consider risks on a case-by-case basis depending on the underlying investment. We also manage the portfolio to risk limits regarding minimum and maximum investment size, and maximum sector exposure limits.



### **Categories of Risk**

We categorise risks into the following categories for ease of management, acknowledging that some risks will cross over multiple categories:

- **Strategic Risk** – the risk that strategy choice or development or external strategic factors impact our ability to achieve our objectives / expected outcomes;
- **Investment Risk** – the risk of not achieving our investment objectives;
- **Regulatory and Compliance Risk** – the risk of not complying with legislation, regulation or external policy, including obligations resulting from our status as a Crown owned company;
- **Reputational Risk** - the risk of loss of reputation or credibility, impacting our ability to achieve our objectives / expected outcomes, including potential damage to relationships; and
- **Operational Risk** - the risk of damage to the business from inadequate or failed internal policies, processes, people or systems including failure to meet agreed budget targets.

### **Our contribution to building Ngāpuhi capability**

We intend to disburse a portion of our investment returns to Ngāpuhi annually. This disbursements programme is called Tūkua, which means ‘to give with integrity’.

The Tūkua programme aims to support the Tiriti settlement process by building the capacity and capability of Ngāpuhi in preparation for settlement. We expect disbursements to be mainly targeted at initiatives that build governance, finance, administration, technology and/or management capacity and capability.

Funding may also be made available for social and cultural development. Supporting these initiatives contributes directly towards building the capacity and capability of Ngāpuhi hapū and rūpū as they work to bring people together, for eventual Tiriti settlement negotiations.

Tūkua has developed over the first four years of our existence; it will continue to evolve along with our investment strategy and will be informed over time by any insights gathered from engagement with Ngāpuhi and other stakeholders.

# HOW WE OPERATE

**Our values**

Our values underpin our business practices and operating principles. They provide guidance to how we work and make decisions.



## TUPU TONU STRATEGIC FRAMEWORK



## OUR RELATIONSHIP WITH SHAREHOLDING MINISTERS

Under the Crown Entities Act 2004 shareholding Ministers oversee and manage the Crown's interests in, and relationship with a monitored Crown entity company and exercise statutory responsibilities. We have two shareholding Ministers: the Minister for Treaty of Waitangi Negotiations and the Minister of Finance, who each own 50% of the company on behalf of the Crown.

Our operations and investment decisions are independent of shareholding Ministers, although shareholding Ministers participate in setting our strategic direction.

We track our investments in a way that allows reporting on them to shareholding Ministers as two portfolios. We regularly report to Ministers with updates on implementation of our investment strategy and progress towards our strategic objectives.

## WHO WE WORK WITH

### **Ngāpuhi**

We seek to understand the commercial intentions of Ngāpuhi and consider these in our investment strategy and decisions.

We keep Ngāpuhi uri informed of investment decisions and our developing portfolio through a range of channels, including by:

- holding open days, circulating pānui (updates), media outreach and direct engagement; and
- engaging with Ngāpuhi uri or entities on suggestions for potential investment opportunities.

We also consider the views of Ngāpuhi in regards to our disbursement programme.

Our engagement with Ngāpuhi will continue to evolve over time as Ngāpuhi organise for Treaty negotiations.

### **Other stakeholders**

In addition to engagement as part of our investment function, we will continue to develop good relationships with other stakeholders, such as investment partners, government agencies, local councils, and tenants.

We will work with officials from Te Tari Whakatau: The Office of Treaty Settlements and Takutai Moana to facilitate appropriate and effective information sharing and ensure our decisions and operations are cognisant of the timeline for Ngāpuhi Tiriti settlement negotiations.



### ***Our relationship to Treaty settlements***

We focus on building and managing commercial investments in line with our constitution and will not have a role in Treaty settlement negotiations. It will be up to the government, in negotiations with Ngāpuhi, to decide how and on what basis the Tupu Tonu portfolio may be used in a settlement.

Our portfolio demonstrates that, through a commercial Treaty settlement, an economically engaged Ngāpuhi can aspire to:

- ownership of whenua in its rohe with established horticultural assets;
- have a physical presence in towns and villages through ownership of productive business properties;
- undertake a key role in growing the economic potential of Northland by having ownership in infrastructure assets and energy production; and
- contribute to positive environmental outcomes through forestry carbon sinks and renewable energy.

We acknowledge the settlement context in which we operate, and the role we play in demonstrating the Crown's commitment to restoring its relationship with Ngāpuhi. We are cognisant of the need to conduct our business in accordance with the principles of Te Tiriti o Waitangi and in a manner that enhances Māori-Crown relations.

## HOW WE WILL KNOW WE'RE ACHIEVING THE RESULTS WE WANT

We will measure how we are tracking towards our strategic objectives and the outcomes we seek through the Key Performance Indicators and targets set out in the annual Statement of Performance Expectations, which we report on through our Annual Report.



