

4 February 2025

PO Box 106 607  
Level 12, 21 Queen Street  
Auckland 1143, New Zealand  
Phone: +64 9 300 6980  
Email: [enquiries@nzsuperfund.co.nz](mailto:enquiries@nzsuperfund.co.nz)  
Website: [www.nzsuperfund.nz](http://www.nzsuperfund.nz)  
NZBN: 9429041903469

Regan Gibbons

By email: [fyi-request-27961-fc030c35@requests.fyi.org.nz](mailto:fyi-request-27961-fc030c35@requests.fyi.org.nz)

Dear Regan,

### Official information request regarding NZ Super Fund investment holdings

I refer to your official information request to The Treasury dated 7 August 2024, transferred to us on 13 January 2025. The information you have requested is set out below, as at 31 December 2024:

Company	NZD Market Value shares	NZD Market Value bonds	NZD Market Value total	% of NZ Super Fund
Bank Leumi Le-Israel B.M.	Not held	Not held	N/A	N/A
Bezeq Israel Telecommunication Corp Ltd	Not held	Not held	N/A	N/A
Booking Holdings Inc	53,271,395	4,214,004	57,485,398	0.072%
Energix Renewable Energies Ltd	Not held	Not held	N/A	N/A
General Mills Inc	46,890,215	1,947,027	48,837,242	0.061%
Motorola Solutions Inc	143,951,312	1,857,774	145,809,085	0.182%
TripAdvisor Inc	Not held	Not held	N/A	N/A
Expedia Group Inc	Not held	500,179	500,179	0.001%
Israel Discount Bank Ltd	Not held	Not held	N/A	N/A
Alstom S.A.	58,180,236	327,633	58,507,870	0.073%
Altice Europe N.V.	Not held	Not held	N/A	N/A

Note that we have interpreted “investment holdings” as equity and/or debt holdings in the relevant companies.

Based on the question, we infer that you may be interested in certain specified companies on the Office of the United Nations High Commissioner for Human Rights (OHCHR) database of businesses alleged to be involved in activities relating to the Israeli settlements in the Occupied

Palestinian Territories. If that is the case, for good order we note that General Mills Inc. is no longer listed in the OHCHR database and we also hold equity in Airbnb Inc. as at 31 December 2024.

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz) or freephone 0800 802 602. Please note that it is our policy to proactively release our responses to official information requests where we consider the request to be a material one.

Our response to your request will be published shortly at <https://www.nzsuperfund.nz/publications/disclosures/oia/>, with your personal information removed.

Please note that Official Information Act requests to us should be directed to [enquiries@nzsuperfund.co.nz](mailto:enquiries@nzsuperfund.co.nz).

Yours sincerely



Adrien Hunter  
Associate General Counsel