



DISCLOSURE STATEMENT

This is the disclosure statement of Strategic Risk Analysis Limited (**SRA**) and Russell Rodney Dickens (**Rodney**) given in accordance with Part 4 of the Securities Markets Act 1988 (**Act**).

SRA was incorporated on 25 October 2005 and began operating in approximately September 2006. Rodney is the managing director and a shareholder of SRA. Any investment advice given by Rodney is given for and on behalf of SRA and not by Rodney in his personal capacity.

EXPERIENCE, QUALIFICATIONS AND PROFESSIONAL STANDING

Qualifications: Rodney obtained a Bachelor of Social Sciences in 1979 and a Bachelor of Social Sciences (Honours) in 1980, both majoring in Economics. Rodney has kept up to date the knowledge gained in obtaining those qualifications by regular reading of relevant material and working in the relevant areas.

Experience: Before founding SRA, Rodney was employed by ASB Bank Limited for five years, including as Group Strategist and Head of Research. He has been a member of the Reserve Bank's Monetary Policy Committee and researched international interest rate behaviour at the Bank of England in London. He has been Chief Economist at NZI Bank and New Zealand Head of Research at ABN AMRO and ANZ McCaughan.

Since it began operating SRA has provided research and reports to its clients in relation to, amongst other things:

- the housing market;
- residential business activity;
- interest rates;
- economic growth;
- consumer spending;
- the labour market;
- inflation;
- the exchange rate; and
- the Official Cash Rate.

In addition, SRA does contract property, industry and economic research.

Membership of a professional body: Neither SRA nor Rodney are members of a professional body that is relevant to the provision of investment advice.

Professional indemnity insurance: SRA does not have professional indemnity insurance.

Dispute resolution: SRA does not have dispute resolution facilities.

CRIMINAL CONVICTIONS, BANKRUPTCY ETC

In the five years before the relevant investment advice is given, neither SRA nor Rodney has been:

1. convicted of an offence under the Act or the Securities Act 1978, or a crime involving

dishonesty (as defined in section 2(1) of the Crimes Act 1961);

2. a principal officer of a body corporate when that body corporate committed any of offences or crimes involving dishonesty described above;
3. adjudicated bankrupt;
4. prohibited by any Act or by a court from taking part in the management of a company or a business;
5. subject to an adverse finding by a court in any proceeding that has been taken against them in their professional capacity;
6. expelled from, or been prohibited from being a member of, a professional body; and
7. placed in statutory management or receivership.

FEES, BROKERAGE AND COMMISSIONS

The majority of SRA's reports do not contain investment advice and as such SRA does not charge any fees particular to the giving of investment advice. However, some reports or contract research may contain investment advice. The annual subscription fees for SRA's pay-to-view reports are available at www.sra.co.nz/pricing.html. Fees for contract research will be charged on a case-by-case basis; for more information please contact SRA at rodney@sra.co.nz. "Rodney's Ravings", which are available online at www.sra.co.nz and are distributed by email, are available free of charge to readers.

OTHER INTERESTS AND RELATIONSHIPS

Rodney may from time to time invest in shares in companies listed on the NZX. As these are retail holdings in publicly listed companies, none of the shareholdings is significant enough, given the overall shareholding in the company, to affect voting or in any way control the particular company.

On occasion SRA may give investment advice in relation to shares listed on the NZX. If SRA does so, Rodney will notify clients in the relevant report if he personally holds shares in that particular company.

SRA receives relevant remuneration from the provision of pay-to-view reports and contract research. Clients of SRA may include individuals, body corporate, trusts, finance companies and publicly listed companies.

SRA does not hold shares in any company.

SECURITIES ADVISED ON

SRA may occasionally give investment advice on the share market and fixed interest markets.

Prepared on 17 August 2009