

## **Investment Policy**

The purpose of the Investment Policy is to ensure investment of cash funds will be maintained in accordance with City Charter and State Statutes by defining the parameters within which public funds are to be managed. In methods, procedures and practices, the policy formalizes the framework for the City's investment activities that must be exercised to ensure effective and judicious fiscal and investment management of the City's funds. The guidelines are intended to be broad enough to allow the Management Services Director to function properly within the parameters of responsibility and authority, yet specific enough to adequately safeguard the investment assets.

### **Scope**

This investment policy applies to all monies invested by the City pursuant to Section 3-2 of the City Code, and applies to those investments authorized by the Code and Arizona Revised Statute 35-323. Bond proceeds are governed by specific indentures and are excluded from the scope of this Policy.

### **Objectives**

The primary objectives, in order of priority, of the City's investment activities shall be:

- a. **Safety.** Safety of principal is the foremost objective of the investment programs. Investments shall be undertaken in a manner that seeks to ensure preservation of principal in the overall portfolio.
- b. **Liquidity.** The investments will remain sufficiently liquid to meet all operating requirements that might be reasonably anticipated.
- c. **Return on Investment.** The investment pools and funds shall be managed with the objective of attaining the maximum rate of return given the constraints of the aforementioned safety and liquidity objectives.

### **Standards of Care**

Prudence: The standard of prudence to be used by investment officials shall be the "prudent person" standard and shall be applied in the context of managing an overall portfolio. Management Services Director and designees acting in accordance with procedures and this investment policy and exercising due diligence shall be relieved of personal liability for an individual security's credit risk or market price changes, provided deviations from expectations are reported in a timely fashion and appropriate action is taken to control adverse developments.

The "prudent person" standard states that, "Investments shall be made with judgment and care, under circumstances then prevailing, which persons of prudence, discretion and intelligence exercise in the management of their own affairs, not for speculation, but for investment, considering the probable safety of their capital as well as the probably income to be derived."

Ethics and Conflicts of Interest: Employees involved in the investment process shall refrain from personal business activity that could conflict with proper execution of the investment program, or which could impair their ability to make impartial investment decisions. Employees and investment officials shall disclose any material interests in financial institutions with which they conduct business. Disclosure shall be made to the governing body. They shall further disclose any personal financial/investment positions that could be related to the performance of the investment portfolio. Employees and officers shall refrain from undertaking any personal investment transactions with the same individual with whom business is conducted on behalf of the City.

Delegation of Authority and Responsibilities: Responsibility for the operation of the investment program is hereby delegated to the Management Services Director who shall act in accordance with established procedures and internal controls for the operation of the investment program consistent with this Investment Policy. All participants in the investment process shall seek to act responsibly as custodians of the public trust. No officer or designee may engage in an investment transaction except as provided under the terms of this policy and supporting procedures.

The City may engage the services of an external investment manager to assist in the management of the City's investment portfolio in a manner consistent with the City's objectives. Such external managers may be granted discretion to purchase and sell investment securities in accordance with this Investment Policy. Such managers must be registered under the Investment Advisers Act of 1940.

***Permitted Investment Instruments***

The City shall invest and reinvest City monies as provided in statute and City Code in any of the following items.

Obligations issued or guaranteed by the full faith and credit of the United States of America.

Obligations issued or guaranteed by the United States or any of the senior debt of its agencies, sponsored agencies, corporations, sponsored corporations, or instrumentalities.

Bonds or other evidences of indebtedness of this state or any of the counties or incorporated cities, towns or duly organized school districts which carry as a minimum AA rating or its equivalent by a nationally recognized statistical ratings organization (NRSRO).

Commercial paper of prime quality that is rated within the top two ratings by a NRSRO. All commercial paper must be issued by a corporation organized and doing business in the United States. The portfolio is limited to a maximum 30% allocation in the commercial paper sector.

Bonds, notes or evidences of indebtedness of any county, municipal district, municipal utility or special taxing district of any state that are payable from revenues, earnings or a special tax specifically pledged for the payment of the principal and interest on the obligations, and for the payment of which a lawful sinking fund or reserve fund has been established and is being maintained, but only if no default in payment on principal or interest on the obligations to be purchased has occurred within five years of the date of the investment, or, if such obligations were issued less than five years before the date of investment, no default in payment of principal or interest has occurred on the obligations to be purchased nor any other obligations of the issuer within five years of the investment.

Bonds, notes or evidences of indebtedness issued by any county improvement district or municipal improvement district of any state to finance local improvements authorized by law, if the principal and interest of the obligations are payable from assessments on real property within the improvement district. An investment shall not be made if:

- a. The face value of all such obligations, and similar obligations outstanding, exceeds fifty percent of the market value of the real property, and if improvements on which the bonds or the assessments for the payment of principal and interest on the bonds are liens inferior only to the liens for general ad valorem taxes.
- b. A default in payment of principal or interest on the obligations to be purchased has occurred within five years of the date of investment, or, if the obligations were issued less than five years before the date of investment, a default in the payment of principal or interest has occurred on the obligations to be purchased or on any other obligation of the issuer within five years of the investment.

Negotiable or brokered certificates of deposit (CD) issued by a nationally or state chartered bank or savings and loan association. CD issuers must have a short-term rating of A1 or its equivalent by a NRSRO. The portfolio is limited to a maximum 30% allocation in the negotiable CD sector.

Certificates of deposit in eligible depositories.

Deposits in one or more federally insured banks or savings and loan associations placed in accordance with the procedures prescribed in section 35-323.01.

Interest bearing savings accounts in banks and savings and loan institutions doing business in this state whose accounts are insured by federal deposit insurance for their industry, but only if deposits in excess of the insured amount are secured by the eligible depository to the same extent and in the same manner as required under this article.

Bonds, debentures, notes, or other evidences of indebtedness that are denominated in United States dollars and that carry at a minimum an "A" or better rating, at the time of purchase, from at least two nationally recognized rating agencies and may be issued by corporations that are organized and doing business in the United States. The portfolio is limited to a maximum 30% allocation in the medium-term corporate note sector.

Participation in the Local Government Investment Pool (LGIP) established pursuant to Section 35-326, Arizona Revised Statutes and operated by the State Treasurer whose portfolio is consistent with this policy.

Securities of or any other interests in any open-end or closed-end management type investment company or investment trust, including exchange traded funds whose underlying investments are invested in securities allowed by state law, registered under the Investment Company Act of 1940, as amended.

### ***Investment Parameters***

Diversification: It is the policy of the City to diversify the investment portfolio so as to protect City monies from material losses due to over-concentration of assets in a specific maturity, a specific issuer, a specific geographical distribution, or a specific class of securities. No more than five percent (5%) of market value of the portfolio shall be invested in securities issued by a single corporation and its subsidiaries/affiliates or municipality. Securities issued by the federal government or its agencies, sponsored agencies, corporations, sponsored corporations, or instrumentalities are exempted from this provision. Portfolio percentage is calculated at the time of purchase.

Maximum Maturities: To the extent possible, the City shall attempt to match its investments with anticipated cash flow requirements. The City will not directly invest in securities maturing more than five (5) years from the date of purchase.

Because of inherent difficulties in accurately forecasting cash flow requirements, a portion of the portfolio should be continuously invested in readily available funds such as LGIP or money market funds to ensure that appropriate liquidity is maintained to meet ongoing obligations.

### ***Portfolio Management***

Following the primary objective of preservation of capital, investments shall be managed to take advantage of market opportunities. In so doing, negotiable securities may be sold prior to their maturity to provide liquid funds as needed for cash flow purposes to enhance portfolio returns, or to restructure maturities to increase yield and/or decrease risk.

### ***Purchases and Sales of Securities***

All trades shall be executed with the objective of realizing the best bid or offer price available. It is the responsibility of the investment personnel and external investment advisors to know the "market price" or relative value of all securities before trades are executed. The method used by the investment personnel and investment advisors shall be the one that will obtain the best execution price or value given the objective of the transaction. A minimum of three (3) bids will be solicited for all transactions.

### ***Authorized Financial Institutions***

A list will be maintained of financial institutions and depositories authorized to provide investment services. In addition, a list will be maintained of approved security broker/dealers selected by conducting a process of due diligence. This may include 'primary' dealers or regional dealers that qualify under Securities and Exchange Commission (SEC) Rule 15C3-1 (uniform net capital rule).

All broker/dealers who desire to become qualified for investment transactions must supply the following (as appropriate):

- a. Audited financial statements demonstrating compliance with state and federal capital adequacy guidelines
- b. Proof of FINRA certification
- c. Proof of state registration
- d. Completed broker/dealer questionnaire (not applicable to Certificate of Deposit counterparties)
- e. Certification of having read and understood and agreeing to comply with the City's Investment Policy.
- f. Evidence of adequate insurance coverage.

All financial institutions who desire to become depositories must supply the following (as appropriate):

- a. Audited financial statements demonstrating compliance with state and federal capital adequacy guidelines
- b. Proof of state registration
- c. Evidence of adequate insurance coverage

A periodic review of the financial condition and registration of all qualified financial institutions and broker/dealers will be conducted.

If the City utilizes an external investment advisor, the advisor may be authorized to transact with its own Approved Broker/Dealer List on behalf of the City. In the event that the investment advisor utilizes its own Broker/Dealer List, the advisor will perform due diligence for the brokers/dealers on its Approved List. Upon request, the advisor will provide the City their Approved Broker/Dealer List.

### ***Safekeeping and Custody***

All security transactions, including collateral for repurchase agreements, entered into by the City shall be conducted on a delivery versus payment basis. Securities shall be held by the City or an independent third-party safekeeping institution designated by the City and evidenced by safekeeping receipts in the City's name. The safekeeping institution shall annually provide a copy of its most recent report on internal controls – Service Organization Control Reports (formerly 70, or SAS 70) prepared in accordance with the Statement on Standards for Attestation Engagements (SSAE) No. 16.

### **Performance Evaluation and Reporting**

Investment performance shall be continually monitored and evaluated by the City's Management Services Director. Investment performance statistics and activity reports shall be generated by the Accounting Division and will provide summary reports on a monthly basis for the Management Services Director, and for the annual financial report.

Monthly Performance Analysis: On a monthly basis the following information, at a minimum, will be provided to the Management Services Director:

- a. The portfolio duration at the end of the current period.
- b. The portfolio yield to maturity at the end of the current period.
- c. The periodic realized return. Realized return is defined as the sum of the portfolio interest earnings plus amortization/accretion plus realized gains minus fees divided by the average portfolio value during the period.
- d. The periodic total return. Total return is defined as the sum of all investment income plus changes in the capital value of the portfolio.
- e. Year to date portfolio interest earnings plus amortization/accretion for the current year compared with the corresponding portion of the prior year.
- f. Cumulative unrealized gains on the portfolio.

### ***Approval***

Any deviation from the preceding policy shall require the prior specific written authority of the City Council. The Policy shall be reviewed on an annual basis.

## **Definitions**

**Agency** – A debt security issued by a government-sponsored enterprise (GSE). While not explicitly guaranteed by the government, GSEs are generally traded with an “implied” guarantee. An example of a GSE is the Federal National Mortgage Association (FNMA).

**Commercial Paper** – An unsecured short-term promissory note issued by corporations, with maturities ranging from 2 to 270 days.

**Credit Quality** – The measurement of the financial strength of a bond issuer. This measurement helps an investor to understand an issuer’s ability to make timely interest payments and repay the loan principal upon maturity. Generally, the higher the credit quality of a bond issuer, the lower the interest rate paid by the issuer because the risk of default is lower. Credit quality ratings are provided by nationally recognized rating agencies.

**Credit Ratings Scales** – Credit quality comparison of short term and long term ratings are as follows:

| <u>Rating</u> | <u>Standard &amp; Poor’s</u> |       | <u>Moody’s</u> | <u>Fitch</u> |       |
|---------------|------------------------------|-------|----------------|--------------|-------|
| Short Term    | A-1+                         | A-1   | P-1            | F-1+         | F-1   |
| Long Term     | AAA -A-                      | A+-A- | Aaa-A3         | AAA-A-       | A+-A- |

**Current Yield Current Return** – A yield calculation determined by dividing the annual interest received on a security by the current market price of that security.

**Delivery Versus Payment (DVP)** – A type of securities transaction in which the purchaser pays for the securities when they are delivered to the purchaser or the custodian.

**Discount** – The amount by which the par value of a security exceeds the price paid for the security.

**Diversification** – A process of investing assets among a range of security types by sector, maturity, and quality rating.

**Duration** – A measure of the timing of the cash flows, such as the interest payments and the principal repayment, to be received from a given fixed-income security.

**Fair Value** – The amount at which an investment could be exchanged in a current transaction between willing parties, other than in a forced or liquidation sale.

**Government Securities** – An obligation of the U.S. government, backed by the full faith and credit of the government. These securities are regarded as the highest quality of investment securities available in the U.S. securities market. See “Treasury Bills, Notes, and Bonds.”

**Investment Policy** – A concise and clear statement of the objectives and parameters formulated by an investor or investment manager for a portfolio of investment securities.

**Local Government Investment Pool (LGIP)** – An investment by local governments in which their money is pooled as a method for managing local funds.

**Par** – Face value or principal value of a bond, typically \$1,000 per bond.

**Premium** – The amount by which the price paid for a security exceeds the security’s par value.

**Principal** – The face value or par value of a debt instrument. Also may refer to the amount of capital invested in a given security.

**Prudent Person Rule** – An investment standard outlining the fiduciary responsibilities of public funds investors relating to investment practices.

**Total Return** – The sum of the portfolio interest earnings plus amortization/accretion plus realized gains plus unrealized gains minus fees divided by the average portfolio value during the period.

**Treasury Bills** – Short-term U.S. government non-interest bearing debt securities with maturities of no longer than one year and issued in minimum denominations of \$10,000.

**Treasury Notes** – Intermediate U.S. government debt securities with maturities of one to ten years and issued in denominations ranging from \$1,000 to \$1 million or more.

**Treasury Bonds** – Long-term U.S. government debt securities with maturities of ten years or longer and issued in minimum denominations of \$1,000.

**Yield** – The current rate of return on an investment security generally expressed as a percentage of the security's current price.