

TITLE: THE EDISON STATE COLLEGE INVESTMENT POLICY

AUTHORITY:

Florida Statute 218.415, State Board of Education Rule 6A-14.0765

POLICY:

1. Scope and General Guidelines

- A. This Investment Policy applies to the surplus funds, in excess of those required to meet current .
- B. Management of the Fund shall be in accordance with Florida Statute 218.415, State Board of Education rule 6A-14.0765, and Edison State College policy.
- C. Subject to the limitations provided above and throughout the Investment Policy, the Investment Manager shall have managerial discretion in terms of asset mix, security selection and timing of transactions.

2. Investment Objectives

The Fund's primary objective is to place the highest priority on the safety of principal and liquidity of funds to meet cash flow demands. A secondary objective is to maximize investment income while providing minimal risk of market volatility. As a tertiary objective, the portfolio seeks to outperform its benchmark on a total return basis.

3. Performance Measurement

In order to assist in the evaluation of the portfolios' performance, the College will use performance benchmarks for short-term and long-term portfolios. The use of benchmarks will allow the College to measure its returns against other investors in the same markets.

- A. The short-term investment portfolio shall be evaluated in comparison with the weighted average return (net book value rate of return) of the Standard & Poor's Local Government Investment Pool All 30 Day rate (LGIP30D). The Standard & Poor's LGIP30D represents Government Investment Pools that maintain a stable net asset value of \$1 per share with an average maturity of 30 days and is rated in Standard & Poor's two highest money market fund rating categories: "AAAm" and "AAm."

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- B. The long-term investment portfolio shall be designed with the annual objective of achieving a comparable return to the Merrill Lynch 1-3 Year Treasury Index. The Merrill Lynch 1-3 Year Treasury Index represents all U.S. Treasury securities maturing over one year, but less than three years. This maturity range is an appropriate benchmark based on the objectives of the College.

4. Prudence and Ethical Standards

Investments shall be made in accordance with the “Prudent Person Rule,” which states that: “Investments shall be made with judgment and care, under circumstances then prevailing, which persons of prudence, discretion and intelligence would 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 probable income to be derived from the investment.”

Any person or firm hired or retained to invest, monitor, or advise concerning these assets shall be held to the higher standard of “Prudent Expert”. The standard shall be that in investing and reinvesting moneys and in acquiring, retaining, managing, and disposing of investments of these funds, the contractor shall exercise: the judgment, care, skill, prudence, and diligence under the circumstances then prevailing, which persons of prudence, discretion, and intelligence, acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of like character and with like aims by diversifying the investments of the funds, so as to minimize the risk, considering the probable income as well as the probable safety of their capital.

5. Authorized Investments

In accordance with Section 218.415 (16), investments shall be limited to fixed income securities selected from the following types:

- A. The Local Government Surplus Funds Trust Fund or any intergovernmental investment pool authorized pursuant to the Florida Interlocal Cooperation Act as provided in Sec. 163.01, FS.
- B. Securities and Exchange Commission registered money market funds with the highest credit quality rating from a nationally recognized rating agency.
- C. Interest-bearing time deposits or savings accounts in qualified public depositories as defined in Sec. 280.02, FS.
- D. Direct obligations of the United States Treasury.
- E. Federal agencies and instrumentalities.

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- F. Securities of, or other interest in, any open-ended management type instrument company or investment trust registered under the Investment Company Act of 1940, 15USC ss 80a-1, provided that the portfolio of such instrument company or investment trust is limited to obligations of the United States Government or any such agency or instrumentality thereof.
- G. Other investments authorized by law or by ordinance for a county or a municipality.
- H. Other investments authorized by law or by resolution for a school district or special district.

It should be recognized that certain securities may meet the above definition of an authorized investment but their risk characteristics, as created by their structure, may be such that a prudent person would deem them inappropriate for the Fund. Securities of this type, which are prohibited include:

- A. Reverse repurchase agreements
- B. Floating rate securities whose coupon floats inversely to an index or whose coupon is determined based upon more than one index
- C. Tranches of Collateralized Mortgage Obligations (CMO) which receive only the interest or principal from the underlying mortgage securities; commonly referred to as "IO's" and "PO's"
- D. Derivatives and other securities whose future coupon may be suspended because of the movement of interest rates or an index. The only exceptions allowed are (1) "plain vanilla" floating rate notes which would have their coupon rate of interest directly linked to a published interest rate index such as LIBOR or U.S. Treasury Bills and (2) other authorized investments specifically listed above which, by the most strict interpretation, may be considered a derivative (e.g. AAA-rated Asset-Backed and Mortgage-Backed Securities).
- E. Any financial institution or company domiciled in the United States, or foreign subsidiary of a company domiciled in the United States, which directly or through a United States or foreign subsidiary makes any loan, extends credit of any kind or character, advances funds in any manner, or purchases or trades any goods or services with Cuba, the government of Cuba, or any company doing business in Cuba in violation of federal law.
- F. Any financial institution or company domiciled outside of the United States if the President of the United States has applied sanctions against the foreign country in which the institution or company is domiciled pursuant to Sec. 4 of the Cuban Democracy Act of 1992.

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6. Maturity and Liquidity Requirements

The Fund shall be constructed in such a manner as to provide sufficient liquidity to pay obligations as they come due. To the extent possible, investment maturities will be matched with known cash needs and anticipated cash-flow requirements.

7. Portfolio Composition

Recognizing that market volatility is a function of duration, the Investment Manager shall maintain the Fund as a short-term duration portfolio. Additionally, it is recognized that proper diversification is considered a prudent investment approach. Diversification guidelines with maximum investment limits are defined in the Edison State College Investment Operating Procedure.

8. Risk and Diversification

Investments held shall be diversified to the extent practicable to control the risk of loss resulting from over concentration of assets in a specific duration, issuer, instrument, dealer or bank through which financial instruments are bought and sold. Diversification strategies shall be reviewed and revised quarterly by the Investment Committee.

9. Authorized Investment Institutions and Dealers

The Investment Manager will maintain an approved list of investment institutions and dealers for the purchase and sale of securities. The Investment Manager is responsible for establishing and maintaining the approved list and will make it available to the Investment Committee quarterly.

10. Third-Party Custodial Agreements

All securities purchased by Edison State College or by its approved Investment Manager under this Policy shall be properly designated as an asset of the College and held in safe keeping by a third party custodial bank or other third party custodial institution. If a bank or trust company serves in the capacity of Investment Manager, said bank or trust company could also perform required custodial and reporting services. No withdrawal of securities, in whole or in part, shall be made from safekeeping except by those designated within the Investment Management and Custodial Agreement between the Custodian and the College.

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Security transactions between a broker/dealer and the custodian involving the purchase or sale of securities by transfer of money or securities must be made on a “delivery vs. payment” basis, if applicable, to ensure that the custodian will have the security or money, as appropriate, in hand at the conclusion of the transaction. Securities held as collateral shall be held free and clear of any liens.

11. Master Repurchase Agreement

All approved institutions and dealers transacting repurchase agreements are to execute and perform as stated in the master repurchase agreement and all transactions are to adhere to the requirements of the master repurchase agreement.

12. Bid Requirement

The Investment Manager shall execute purchases and sales in a competitive bid environment wherein at least three (3) offers or bids are obtained for each security. Exceptions to this approach may be made when (1) prices for purchases/sales are compared to systems providing current market prices and deemed reasonable, (2) when the security to be purchased is unique to one institution and has the approval of the Investment Committee or (3) the security has recently been issued and is trading at the same price by all financial institutions.

13. Internal Controls

The Vice President of Financial Services will establish a system of internal controls as described in College Administrative Procedures No. 6037. The internal controls will be reviewed by the Investment Committee and Independent Auditors as part of any financial audit periodically required. The controls will be designed to prevent losses of public funds arising from fraud, employee error, and misrepresentation by third parties, unanticipated changes in financial markets, or imprudent actions by employees and officers of the College.

14. Continuing Education

The Vice President of Financial Services will annually complete eight hours of continuing education in subjects or courses related to investment practices and products.

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15. Reporting

Unless otherwise indicated, the following are the responsibilities expected of the Investment Manager:

- A. Monthly reporting of holdings and transactions occurring in the Fund to the Edison State College Investment Committee. This report is to include at least (1) all assets held by the Fund by class/type, book value, approximate market value, income earned, accrued income and (2) all transactions occurring in the Fund during the month.

- B. Quarterly reporting of the Fund's performance. The Investment Manager will report the Fund's total rate of return, which reflects the true earnings of the Fund and incorporates cash flows, changes in market value and income earned to the Edison State College Investment Committee.

- C. Calculation of the Fund's total rate of return will comply with the performance measurement standards as defined by the Association of Investment Management and Research (AIMR).