

Exhibit I

INVESTMENT POLICY

CITY OF PORTLAND, OREGON

PURPOSE

This Policy sets forth current criteria for the operation of the investment portfolio. As economic conditions change, the Policy may need to be amended to reflect new trends and opportunities within the framework of this Policy. It will be recognized that the primary objective of the Investment Policy is to establish a conservative set of investment criteria that will prudently protect the City's principal sums and enable the City to generate a fair rate of return from its investment activities.

This Policy applies to the investment of all funds on deposit at the City of Portland Treasurer's Office, as well as all trust funds for which the City has investment responsibility. Funds held by Trustee or Fiscal Agents are excluded, if the City does not have explicit investment authority. Deferred Compensation funds have separate rules and are not covered within this Policy. The estimated investments covered herein range from \$350 million to \$750 million.

RESPONSIBILITY

The City Treasurer will be responsible for the implementation of this Policy. In the absence of the City Treasurer, the City's Chief Deputy Treasurer or the Director of the Bureau of Financial Management shall perform the investment duties. Any amendments to this Policy must be approved by the City Council after seeking the advice of the Director of the Office of Finance and Administration, the City Treasurer, and the City's Investment Advisory Committee. The Director of the Office of Finance and Administration (or designee) will establish the maximum investment level with each Oregon financial institution after consulting with the Investment Advisory Committee. The City Council will adopt a City Investment Policy annually.

TYPES OF INVESTMENT AND DIVERSIFICATION

The following types of investments will be permitted in the City's investment portfolio:

◆ **United States Treasury Debt Obligations**

- Maximum % of Portfolio 100%
- Maximum Maturity 7 Years
- Securities held for safekeeping at the City's custodian Bank or successor

◆ **United States Agency Debt Obligations**

- Maximum % of Portfolio 100%
- Maximum Maturity 2 Years
- Maximum % of Portfolio Per Issuer 50%
- Securities held for safekeeping at the City's custodian Bank or successor

◆ **Repurchase Agreements Secured by United States Treasury Debt Obligations**

- Maximum % of Portfolio 30%
- Maximum Maturity 30 days
- Repurchase agreements with brokerage firms will only be executed with dealers from the list of Government Security Dealers reporting to the Market Reports Division of the Federal Reserve Bank of New York
- Repurchase agreements cannot exceed 2% of brokerage firm's liabilities
- A signed repurchase agreement will be obtained in advance of the initial execution of an investment
- Securities which serve as collateral for repurchase agreements must be delivered to the City's Trust Account at the City's custodian bank or successor on a delivery versus payment basis
- Only United States Treasury Securities shall be used in conjunction with the repurchase agreement and such securities shall have a maturity of not longer than three years
- The price paid by the Treasurer for United States Treasury Securities in the repurchase agreement shall not exceed amounts or percentages prescribed by written policy of the Oregon Investment Council or the Oregon Short-Term Fund Board created by ORS 294 885

◆ **Time Deposits in State of Oregon Financial Institutions Collateralized 25% by Securities as Required by Oregon Revised Statutes**

- Maximum % of Portfolio 50%
- Maximum Maturity 1 Year
- Maximum % of Portfolio Per Issuer 25%
- Securities held in vault at the City's Treasury

◆ **Bankers' Acceptance Issued by Financial Institutions in Compliance With the Provisions of ORS 294.035**

- Maximum Percent of Portfolio 50%
- Maximum Maturity 6 Months
- Maximum Percent of Portfolio Per Issuer 25%
- Securities held for safekeeping at the City's custodian Bank or successor Bank

◆ **State of Oregon Local Government Investment Pool**

The legal maximum as provided under ORS 294 810

◆ **Commercial Paper Issued by United States Corporations in Compliance With the Provisions of ORS 294.035**

- Investment Rating A-1, P-1
- Maximum Percent of Portfolio 25%
- Maximum Maturity 180 Days
- Maximum Percent of Portfolio Per Issuer 5%
- Securities held for safekeeping through the City's custodian Bank or successor

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 Investment Policy
 September 1998
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INVESTMENT DIVERSIFICATION

Diversification requirements must be met on the settlement date of an investment transaction. If due to unanticipated cash needs, the investment in any security type or financial issuer later exceeds the limitations in this policy, the Treasurer is responsible for bringing the investment portfolio back into compliance as soon as is practical.

DISTRIBUTION OF PORTFOLIO MATURITIES

Distribution, by maturity, of the investments is illustrated below.

<u>Maturity</u>	<u>Percentage of Funds</u>
0-2 Years	50-100%
2-7 Years	0- 50%

This maturity structure applies to the Treasury's estimate of the lowest cash balance that the portfolio will reach during the next seven years. If, for example, the projected lowest cash balance is \$200 million, then up to \$100 million may be invested in the two to seven year maturity range. All other funds must be invested in less than two year maturities and must meet the City's cash flow requirements. The City's Investment Advisory Committee will be consulted prior to implementing a strategy of purchasing securities with maturities beyond two years. The portfolio's weighted average maturity shall not exceed eighteen (18) months.

BROKERAGE ALLOCATION

The Treasury will maintain a current list of all brokerage firms that have been approved by the Director of the Office of Finance and Administration (or designee) to conduct investment business with the City. The Treasury will obtain a minimum of three quotes from different brokers before it executes a government securities transaction, or purchases commercial paper issued by a corporation outside of Oregon on the national market. The allocation of brokerage business will be based upon which brokerage firm offers the best price to the City on each particular transaction. Where two or more brokers have offered the same best price, allocation will go to the investment firm that has provided the best service to the City.

When purchasing bankers' acceptances or commercial paper, the Treasury will compare interest rates on similar investments from other investment dealers. The Treasury will also determine that the rates being offered the city are rates comparable to those available for similar investments in the national market.

When purchasing time deposits, the Treasury will obtain interest rate offers from all Oregon financial institutions approved to do business with the City. The time deposits will be allocated to the highest interest rate offered the City, consistent with the maximum deposit levels set for each financial institution by the Director of the Office of Finance and Administration (or designee)

METHOD OF ACCOUNTING

The City shall comply with all required legal provisions and Generally Accepted Accounting Principles (GAAP). The accounting principles are those contained in the pronouncements of authoritative bodies including but not necessarily limited to, the American Institute of Certified Public Accountants (AICPA), the Financial Accounting Standards Board (FASB), and the Government Accounting Standards Board (GASB)

REPORTING REQUIREMENTS

The City Treasurer will provide the following reports on a monthly basis to the City's Investment Advisory Committee and the Director of the Office of Finance and Administration (or designee)

- ◆ A list of securities owned, with all maturities over one year priced at both cost and market value
- ◆ A list of all investment transactions showing the net gain or loss on each investment

INTERNAL CONTROLS

The internal controls of the City of Portland's Treasury are reviewed and tested by the City's internal and external auditors

PERFORMANCE EVALUATION

The City's investment performance shall be reviewed monthly by the Director of the Bureau of Financial Management. The City's portfolio yield will be compared monthly to the yield of U S Treasury Securities with a maturity similar to the average maturity of the City's portfolio

ANALYSIS OF INVESTMENT RISKS

In analyzing the City's Investment Portfolio, there are three major risks that the City incurs through its investment activities. The first risk that the City faces is the interest rate risk. This risk is the uncertainty of the size of future incomes from securities caused by fluctuations in the general level of interest rates in the capital markets.

Interest rates have fluctuated dramatically over the last ten years and, therefore, the City's Investment Policy is designed to minimize the interest rate risk. This is accomplished by limiting investments to a maximum maturity of seven years, and by investing to meet the City's cash flow requirements.

The second risk that the City faces can be termed the purchasing power risk. This risk can be defined as the uncertainty of the purchasing power of interest and principal to be received in the future. It can be easily recognized that if the amount of income from a security in current dollars remains unchanged over a period of time while the price index is rising, then the amount of income in constant dollars declines and the constant value of the principal to be received also declines.

The final risk is the financial risk of not receiving principal and interest when due from an issuer. The design of the types of investments permitted by the Investment Policy seeks to minimize this risk by the conservative nature of the permissible investments and by establishing safe limits on the level of investments with Oregon financial institutions and issuers of commercial paper. A portfolio policy stressing a relatively short maturity serves to additionally minimize the financial risk.

Thus, it is the conclusion that the shorter the portfolio is in maturity, the less risk the City is incurring with regard to the three major risks that it faces. The policy of keeping 100% of the funds in seven year or less maturities leaves open the flexibility to earn capital gains on the City's investments by shifting funds out to longer maturity when interest rates are falling, yet avoids the extreme amount of exposure to the interest rate risk and purchasing power risk that we would incur in an even longer-term portfolio.

September 1, 1998

MEMORANDUM

TO Mayor Vera Katz
Commissioner Jim Francesconi
Commissioner Charlie Hales
Commissioner Gretchen Miller Kafoury
Commissioner Erik Sten
City Auditor Barbara Clark

FROM Tim Grewe

SUBJECT Investment Policy

Attached is the Investment Policy developed by the Office of Finance and Administration. Oregon law pertaining to the investment of public funds requires the annual adoption of an Investment Policy. The City's Investment Advisory Committee has reviewed the Policy and recommends its adoption by Council.

The Investment Policy continues to reflect the conservative strategies the City has utilized since adoption of the first Policy in 1978. The Policy's basic strategies, which have generated above average returns, remain in tact. Two minor changes were made in this year's policy: 1) the maximum percentage of the portfolio which can be invested in any single United States Agency is being increased from 30% of the portfolio to 50%, and 2) the maximum maturity for commercial paper is being expanded from 120 days to 180 days. These changes were made because bank time deposits are not presently offering competitive rates of return. Consequently, these changes will expand the City's capacity in other permissible investment alternatives. Our policy remains more conservative than state law allows and fully protects the City's cash reserves.

If you have any questions, please call David Smith directly at 823-4584.

TG DT JB
Attached

RESOLUTION No. 35725

Adopt City of Portland Investment Policy (Resolution)

WHEREAS, the City of Portland is allowed under State of Oregon law to invest its idle funds in United States Government or United States Agency securities, time deposits and bankers' acceptances of financial institutions located within Oregon, in commercial paper of financial institutions and corporations, and in the Local Government Investment Pool, and

WHEREAS, State of Oregon law (ORS 294 135) requires that the City of Portland annually adopt a formal Investment Policy, and

WHEREAS, there is a need to clearly define the criteria for operation of the City's investment portfolio, and

WHEREAS, the primary objective of the Investment Policy is to establish a conservative set of investment criteria that will prudently protect the City's principal sums and enable the City to generate a fair rate of return, and

WHEREAS, the Public Finance and Treasury Division of the Office of Finance and Administration is charged with responsibility for managing the City's investments, and

WHEREAS, the Office of Finance and Administration has developed a formal Investment Policy after seeking the advice of the City's Investment Advisory Committee, and

WHEREAS, the City of Portland is required under State of Oregon law (ORS 294 135) to submit the Investment Policy for review by the State of Oregon Short-Term Fund Board,

NOW, THEREFORE, BE IT RESOLVED by the Council of the City of Portland, Oregon that

- 1 The Investment Policy, attached hereto as Exhibit I, fulfills all State of Oregon, City Charter and Code mandated requirements, and is hereby adopted as the City of Portland's Investment Policy
- 2 The City Treasurer shall submit the adopted Investment Policy to the State of Oregon Short-Term Fund Board for their review
- 3 The City Treasurer shall be responsible for the implementation of the Investment Policy



- 4 Amendments to the Investment Policy must be approved by the City Council
- 5 This resolution shall remain in effect from the date of adoption unless a change is directed by Council

Adopted by the Council, **SEP 09 1998**

Mayor Katz
Office of Finance and Administration
Tim Grewe David Smith J Bell
September 1, 1998

BARBARA CLARK
Auditor of the City of Portland

By *Britta Olson*
Deputy

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Agenda No

RESOLUTION NO

35725

Title

Adopt City of Portland Investment Policy (Resolution)

INTRODUCED BY	Filed	SEP 1 1998
Mayor Vera Katz	Barbara Clark Auditor of the City of Portland	
NOTED BY COMMISSIONER		
Affairs		
Finance and Administration <i>W...</i>	By <u><i>Cay Kerchner</i></u> Deputy	
Safety	For Meeting of _____	
Utilities	ACTION TAKEN	
Works		
BUREAU APPROVAL		
Bureau Office of Finance and Administration-		
Prepared by Date		
D Smith/D Thurman 9-01-98		
Budget Impact Review		
X Completed Not Required		
Bureau Head Tim Grewe <i>Tim Grewe</i>		

AGENDA		FOUR-FIFTHS AGENDA	COMMISSIONERS VOTED AS FOLLOWS	
			YEAS	NAYS
Consent X	Regular	Francesconi	S	
NOTED BY		Hales		
City Attorney		Kafoury		
City Auditor		Sten		
City Engineer		Katz		