

Exhibit A: Investment Policy**FIN 2.14 - INVESTMENT POLICY**

CITY OF PORTLAND, OREGON

I. PURPOSE

This Investment Policy (“Policy”) sets forth current criteria for the operation of the City of Portland’s investment activities. As economic conditions change, the Policy may need to be amended to reflect new trends and opportunities within the framework of this Policy.

II. GOVERNING AUTHORITY

All investment activities shall be conducted in conformance with Oregon Revised Statutes and applicable Federal Law. Specifically, this Policy is written in conformance with ORS 294.035; 294.040; 294.046; 294.052; 294.135; 294.145; and 294.810. All funds within the scope of this Policy are subject to regulations established by the State of Oregon. Any revisions or extensions of these sections of ORS shall be assumed to be part of this Policy immediately upon being enacted.

III. SCOPE

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. All trust or custodial funds shall be invested and administered at the direction of the City Treasurer. Funds held by a Trustee or Fiscal Agents are excluded, if the City does not have investment control. Deferred Compensation funds are governed by separate rules and are not covered within this Policy.

Bond proceeds are included in the City’s portfolio, factored into its structure and managed to meet cash-flow requirements. Specific investments may on occasion be established to recognize the long-term nature of some funds (e.g. capital projects) and conform to legal restrictions (e.g. bond covenants).

IV. POOLING OF INVESTMENTS

The City’s investment program uses a “pooled” investment approach where all monies of all funds covered by this Policy are combined in invested in a consolidated portfolio. By combining the cash flows of all the funds, the pooled investment approach seeks to increase the efficiency the investment program because economies of scale can be taken advantage of to obtain better prices and reduce transaction and administrative costs. Investment income will be allocated to the various funds based on their respective participation and in accordance with generally accepted accounting principles. When considered to be to the City’s benefit, the City Treasurer may establish one or more separate pools to meet the requirements of specific funds. Compliance with this Policy will be evaluated on an aggregate basis across all funds covered by this policy

VI. RESPONSIBILITIES

The City Treasurer will be responsible for the implementation of this Policy. The City Treasurer and the Director of the Bureau of Revenue and Financial Services (Chief Financial Officer) (or designee) shall be authorized to perform the investment duties. Authorized persons, acting in accordance with written procedures and this Policy and exercising due diligence, shall be relieved of personal responsibility 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.

VII INVESTMENT ADVISORY COMMITTEE

The City has established an Investment Advisory Committee (“IAC”) to advise the Commissioner In Charge, the Director of the Office of Management and Finance, the City Council and the City Treasurer of the City on: investment policies and investment practices of the City; maximum bank balances to be maintained by the City; and such other investment matters as the Commissioner in Charge of the Office of Management and Finance, the City Council or the Director of the Office of Management and Finance may request. The IAC is advisory in nature and does not have any direct responsibility for the management of the City’s investment program.

VIII. INTERNAL CONTROLS

The City Treasurer is responsible for establishing and maintaining an internal control structure designed to ensure that the assets of the City are protected from loss, theft or misuse. The procedures should include references to individuals authorized to execute transactions or transfers, safekeeping agreements, repurchase agreements, wire transfer agreements, collateral/depository agreements and banking services contracts, as appropriate. The internal control structure shall be designed to provide reasonable assurance that these objectives are met. The concept of reasonable assurance recognizes that (1) the cost of a control should not exceed the benefits likely to be derived; and (2) the valuation of costs and benefits requires estimates and judgement by management. The internal controls of the City’s Public Finance and Treasury Division are reviewed and tested by the City’s internal and external auditors annually.

IX. STANDARD OF CARE

All persons performing investment duties (“investment officers”) shall do so applying the “prudent person” standard in managing all funds for which the City has investment responsibility. Investment officers acting in accordance with written procedures and this Policy and exercising due diligence shall be relieved of personal responsibility for an individual security’s credit risk or market price changes, provided deviations from expectations are reported and appropriate action is taken to control adverse developments within a timely fashion.

The “prudent person” standard states: “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 probable income to be derived.”

X. CONFLICT OF INTEREST AND ETHICS

Investment officers shall refrain from personal business activity that could conflict with the proper execution and management of the investment program or that could impair their ability to make impartial decisions. Investment officers shall disclose any material interests in financial institutions with which they conduct business, any personal financial/investment positions that could be related to the performance of the investment portfolio, and shall refrain from undertaking personal investment transactions with the same individuals with whom business is conducted on behalf of the City.

Investment officers shall, at all times, comply with the State of Oregon Government Standards and Practices code of ethics set forth in ORS Chapter 244, and the City’s Charter, Code, policies and administrative rules, which include, but are not limited to, the City’s Code of Ethics.

XI. QUALIFIED FINANCIAL DEPOSITORIES AND BROKER/DEALER COUNTERPARTIES

The Director of the Bureau of Revenue and Financial Services (Chief Financial Officer) (or designee) and City Treasurer, in consultation with the IAC, shall establish the maximum deposit level with each Oregon qualified financial depository and the criteria for determining which broker/dealer firms and affiliated registered representatives shall be eligible to conduct investment transactions with the City. The City Treasurer will maintain a current list of all broker/dealer firms and affiliated registered representatives that have been approved to conduct investment transactions with the City. The City Treasurer and the IAC shall conduct an annual review of each approved broker/dealer firm to determine whether it should remain on the approved list.

Broker/dealer firms must meet the following minimum criteria. Additional criteria may also be required:

1. Must be registered with the Securities and Exchange Commission (SEC);
2. Must be registered with the Financial Industry Regulatory Authority (FINRA);
3. Must provide most recent audited financial statements;
4. Must provide FINRA Focus Report filings.

Approved broker/dealer employees who execute transactions must meet the following minimum criteria:

1. Must be a registered representative with FINRA;
2. Must be licensed by the state of Oregon;
3. Must certify (in writing) that they have read, understand and agree to comply with the most current version of this Policy.

4. Must satisfy additional criteria as and if required.

Investment officers will strive for best execution of trades and shall solicit competitive bids or offers for all investable assets. Investment officers should seek to obtain a minimum of three quotes from different financial institutions before executing transactions. Investment officers will also verify that the rates being offered to the City are rates comparable to those available for similar investments within the national market. If three quotes cannot be obtained for a given transaction, investment officers shall note that fact on forms documenting the transaction. 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.

IAC members associated with depository institutions or broker/dealer firms will address conflicts of interest by removing their firms from the list of financial institutions eligible to conduct depository or investment transactions with the City and agreeing not to provide the City with any investment advisory services for which a fee is collected during the term of their appointment.

XII. SAFEKEEPING AND CUSTODY

To protect against potential losses by collapse of individual securities dealers, all deliverable securities owned by City, including collateral on repurchase agreements and securities lending requirements, shall be held in safekeeping by a third-party bank trust department acting as agent for the City under the terms of a custody agreement executed by the bank and by City.

All trades where applicable will be executed by delivery vs. payment (DVP) to ensure that securities are deposited in the City's safekeeping institution prior to the release of funds. All deliverable securities will be held by the City's designated independent third-party custodian for safekeeping. All securities will be evidenced by safekeeping receipts in the City's name. Upon request, the safekeeping institutions shall make available a copy of its Statement on Standards for Attestation Engagements (SSAE) No. 16. The City Treasurer shall maintain evidence of its ownership in non-deliverable securities.

XIII. PERMITTED INVESTMENTS AND DIVERSIFICATION

The ORS specifies the basic investment limits and guidelines for government entities. From among the securities allowed by the ORS, the City chooses to further restrict its permitted investment types listed below. In the event an apparent discrepancy is found between this Policy and the ORS, the more restrictive parameters will take precedence.

A. United States Treasury Securities

Per ORS 294.046, the State Treasurer maintains a list of permitted securities.

- | | | |
|---|------------------------------|---------|
| - | Maximum Percent of Portfolio | 100% |
| - | Maximum Maturity | 7 Years |

- TIPS (US Treasury Inflation Indexed Securities) 10 Years

B. United States Agency and Instrumentality Securities

Per ORS 294.046, the State Treasurer maintains a list of permitted securities.

- Maximum Percent of Portfolio 100%
- Maximum Percent of Portfolio Per Issuer 35%
- Maximum Maturity 7 Years

C. Repurchase Agreements

- Maximum Percent of Portfolio: 25%
- Maximum Maturity: 90 Days
- Only Primary Government Securities Dealers reporting to the Federal Reserve Bank of New York may be counterparties.
- Repurchase agreements cannot exceed 2% of counterparty'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 be delivered to a tri-party safekeeping account. Tri-party custodians are required to provide the City with evidence of collateral ownership.
- Transactions are to be conducted on a delivery versus payment basis.
- Collateral for repurchase agreements may be US Treasury securities or US Agency and Instrumentality securities only. Maximum maturity for acceptable collateral is three years.

D. Interest-Bearing Deposits

Time Deposits, Interest-Bearing Deposits, or Certificates of Deposit in Banks and Credit Unions in Compliance with the Provisions of ORS Chapter 295. Deposits placed in banks or credit unions which do not participate in the Oregon State Treasurer's Public Funds Collateralization Program (PFCP) shall be limited to amounts insured by the Federal Deposit Insurance Corporation (FDIC) or the National Credit Union Administration (NCUA), as applicable.

- Maximum Percent of Portfolio 50%
- Maximum Percent of Portfolio Per Issuer 25%
- Maximum Maturity 1 Year

E. Bankers' Acceptance

Issued by Financial Institutions in Compliance with the Provisions of ORS 294.035

- Maximum Percent of Portfolio 25%
- Maximum Percent of Portfolio Per Issuer 5%
- Maximum Maturity 6 Months

F. Oregon Municipal Obligations

Municipal debt obligations issued by Oregon state or local governments and their agencies and authorities, not to include conduit revenue bonds issued on behalf of a non-governmental entity.

- Maximum Percent of Portfolio: 25%
- Maximum Percent of Portfolio Per Issuer: 5%
- Maximum Maturity: 5 Years
- Minimum Rating (or its equivalent): A-1 (ST) or AA (LT)

G. Corporate Indebtedness

(Commercial Paper and Corporate Bonds) Issued by United States Corporations in Compliance with the Provisions of ORS 294.035

Combined Corporate Indebtedness:

- Maximum Percent of Portfolio: 35%
- Maximum Percent of Portfolio Per Issuer: 5%

(includes securities issued by parent company and all subsidiaries)

Allowable Corporate Securities Issuers must meet the policy guidelines set forth in Appendix "A".

- From time to time City Council, may add or remove a specific company from Appendix "A", at which point investment officers are not permitted to purchase securities of the companies that have been removed; any existing positions of the removed company need not be sold.

G.1. Commercial Paper (CP)

- Minimum Ratings: Short-Term (ST) ratings of A-1, P-1, F-1 (or better) by any Nationally Recognized Statistical Rating Organizations (NRSROs) of the Securities and Exchange Commission (SEC) at the time of purchase. In the event of a split rating, the lowest rating will be utilized to evaluate investment portfolio compliance.
- Maximum Maturity 270 Days

G.2. Corporate Bonds

- Minimum Ratings: Short-Term (ST) or Long-Term (LT) bond ratings of AA- or Aa3 (or better), equivalent to the security's maturity, by at least two Nationally Recognized Statistical Rating Organizations (NRSROs) of the Securities and Exchange Commission (SEC) at the time of purchase.
- When the corporate indebtedness is issued by an Oregon entity, the rating must be A- or A3 (or better), equivalent to the security's maturity at the time of purchase, by at least two NRSROs.
- Maximum Maturity 3 Years

H. State of Oregon Local Government Investment Pool(s)

The permitted maximum(s) as prescribed by ORS 294.805 to 294.895 and all other applicable Oregon Revised Statutes.

I. Securities Lending

The City Treasury may enter into a securities lending program ("SLP") to earn incremental income above that which is generated from the securities contained the City's investment portfolio. Security Lending is a temporary exchange of portfolio assets for acceptable collateral between a lender (the City) and an approved borrower. The SLP must meet the policy guidelines set forth in Appendix "B."

XIV. DIVERSIFICATION AND CREDIT RATINGS

Percentage holding limits listed in this Policy apply on the settlement date of an investment transaction. There is no compliance violation if a percentage invested in any security type or financial issuer exceeds Policy limits after settlement due a change in the size of the portfolio or other circumstances beyond the City Treasurer's control. However, the City Treasurer should endeavor to bring holdings the investment portfolio back into compliance when practical.

Credit ratings, where listed in this Policy, specify the minimum credit rating category, without regard to +/- or 1,2,3 modifiers if any, required at purchased. Only one rating from a Nationally Recognized Statistical Rating Organization ("NRSRO") is required. In the event of a split rating, the lowest rating will be used to evaluate investment compliance. In the event a security held by the City is subject to a credit rating change that brings it below the minimum credit ratings specified in this Policy, the City Treasurer should determine an appropriate course of action on a case-by-case basis, considering such factors as the reason for the change, prognosis for recovery or further rate drops, and the market price of the security. The rating change shall be noted on the next monthly investment report along with the recommended course of action.

XV. PORTFOLIO MATURITIES

The City Treasury (or designee) shall maintain a system to monitor and forecast revenues and expenditures so that City funds can be invested to the fullest extent possible while providing sufficient liquidity to meet the City's reasonably anticipated cash flow

requirements. Maturities of investments will be selected to provide necessary liquidity, manage interest rate risk, and optimize earnings. Because of inherent difficulties in accurately forecasting cash flow requirements, a portion of the portfolio should be continuously invested in readily available funds. The portfolio's weighted average maturity shall not exceed twenty-four (24) months.

XVI. 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).

XVII. REPORTING REQUIREMENTS

An Investment Report which provides a detailed review of the City's investments will be produced monthly. Copies of the report will be sent to the Chief Administrative Officer (or designee), the Director of the Bureau of Revenue and Financial Services (Chief Financial Officer), the City Treasurer, members of the City Council and members of the IAC. The report will provide a review of the investment portfolio including, but not limited to:

1. List of portfolio holdings.
2. Current yields and distributions.
3. Amortized cost, market value and realized and unrealized gains/losses.
4. List of transactions.
5. Diversification analysis.
6. Comparisons to benchmarks.
7. Demonstration of the investment portfolio's compliance with this Investment Policy.

A summary of the Investment Reports will be posted monthly on the Public Finance and Treasury's section of the City of Portland's website.

XVIII. PERFORMANCE EVALUATION

The investment portfolio shall be managed with the objective of obtaining a market rate of return throughout budgetary and economic cycles, commensurate with the investment risk constraints and the cash flow needs. The City will employ an active management approach that allows for the sale of securities prior to their scheduled maturity dates for purposes of improving the portfolio's credit quality, liquidity, or return in response to changing market conditions or the City circumstances. This Policy recognizes that in a diversified portfolio, occasional measured losses are inevitable and must be considered within the context of the overall portfolio's structure and expected investment return, with the proviso that adequate diversification and credit analysis have been implemented.

The City's investment performance shall be reviewed monthly by the Director of the Bureau of Revenue and Financial Services (Chief Financial Officer) (or designee). Performance evaluations within the investment industry are commonly referred to as benchmarking. An appropriate performance benchmark shall be established against which portfolio performance shall be compared on a regular basis. The selected performance benchmark shall be representative of the City's overall investment objectives and liquidity requirements.

XIX. POLICY

The City Council will adopt a City Investment Policy annually. Any amendments to this Policy must be approved by the City Council after seeking the advice of the Director of the Bureau of Revenue and Financial Services (Chief Financial Officer) (or designee), the City Treasurer, the City's Investment Advisory Committee (IAC), and the Oregon Short Term Fund Board.

APPENDIX “A”

ALLOWABLE CORPORATE SECURITIES ISSUERS

- A. Apple
- B. Colgate-Palmolive
- C. Johnson & Johnson
- D. Alphabet Inc. (Google)
- E. Microsoft
- F. Nike
- G. Procter & Gamble

APPENDIX “B”

SECURITIES LENDING AND REINVESTMENT OF CASH COLLATERAL

A. General

The policy guidelines set forth below shall only govern the City of Portland’s securities lending program (“SLP”). The following SLP guidelines shall only apply to the reinvestment of cash collateral within the context of the City’s SLP. The City Treasurer, in conjunction with the City’s SLP Agent, shall be responsible for implementing the SLP. In the absence of the City Treasurer, the Chief Administrative Officer (or designee) shall be responsible for the implementation of the SLP on behalf of the City.

The objective of the SLP is to utilize a prudent investment management approach to earn incremental income above that which is generated from the securities contained the City’s investment portfolio. All reinvestment of cash collateral shall be made taking into consideration the following objectives: preservation of principal, liquidity and return on investment.

B. Program Management

In order to minimize disruption of cash and investment management operations, a single financial institution shall be selected to serve as the City’s SLP agent and securities custodian. Subject to a form of loan agreement and in accordance with the City’s SLP policy guidelines, the SLP agent will arrange the terms and conditions of security loans; monitor the market value of securities lent and the collateral received; and invest the cash received as collateral in a separately managed client account. The SLP agent will arrange for all loans of securities held in City’s custodial account and may act upon authorized investment instructions consistent with provisions of this section of the policy. The SLP agent shall be required to indemnify the City from any loss as a result of borrower loan default or simple failure to return loaned securities. The SLP agent shall be responsible for monitoring, reporting and remedying circumstances of non-compliance with the City’s policy. The SLP agent must provide monthly accounting, performance, compliance and management reports that will be submitted to the City Treasurer and Director of the Bureau of Revenue and Financial Services (Chief Financial Officer) (and/or designee).

C. Loan Guidelines and Authorized Investments of Cash Collateral

Securities may be placed on loan if the following criteria have been met:

1. The City receives U.S. dollar-denominated cash as collateral.
2. All borrowers must pledge and deliver cash collateral for each loan equal to at least 102 percent of the value of the loaned securities plus accrued interest, at the time the loan is initiated.
3. All securities are loaned on a fully collateralized basis. The market value of the collateral must be maintained by the SLP agent at a level that is not less than 102% of the market value of the securities loaned.
4. The SLP agent provides normal settlement liquidity (standard industry settlement terms) for all loaned securities.
5. All lending counterparties must be primary dealers in United States Government Securities as recognized by the Federal Reserve Bank of New York, hereafter, "Primary Dealer", and have an executed master securities lending agreement in place prior to initiating any transactions. Net capital of all lending counterparties must be in excess of \$100 million.
6. No more than 25% of net assets on loan are placed with the same lending counterparty.
7. No more than 75% of the City's total portfolio may be on loan at any given time.
8. Each security on loan must account for less than 50% of the total amount issued and outstanding.

The SLP agent is authorized to invest cash collateral in the following securities:

1. United States Treasury Bills, Notes and Bonds
 - A. Maximum maturity of 90 days.
 - B. Maximum % of collateral reinvestment Portfolio - 100%
2. United States Government Agency Securities
 - A. Federal National Mortgage Association (FNMA).
 - B. Federal Home Loan Bank (FHLB).
 - C. Federal Farm Credit Bank (FFCB).
 - D. Federal Home Loan Mortgage Corporation (FHLMC).
 - E. Government National Mortgage Association (GNMA).
 - F. Maximum final maturity of 90 days.
 - G. Maximum % of collateral reinvestment Portfolio - 100%
3. Repurchase Agreements
 - A. All counterparties must be Primary Dealer as recognized by the Federal Reserve Bank.
 - B. The counterparty must have an executed repurchase agreement in place.
 - C. Maximum maturity of repurchase agreements shall be 35 business days.
 - D. Maximum % of collateral reinvestment Portfolio - 100%

- E. Reverse repurchase agreements are not permitted investments.
- F. No more than 25% of loan-eligible assets shall be placed with a single counterparty.
- G. Collateral must be delivered to the City's custodial account or to a separately managed client account established for the benefit of the City, and pursuant to the terms of the specific repurchase agreement in the name of the City.
- H. Collateral for repurchase agreements may include any combination of the following:
 - a) United States Treasury Securities
 - (1) Collateralized at 102 percent
 - b) United States Government Agency Securities.
 - (1) Collateralized at 102 percent
 - c) United States Government Agency Mortgage Securities
 - (1) Collateralized at 102 percent
 - d) Commercial Paper ("CP")
 - (1) Collateralized at 102 percent.
 - (2) Rating must be A1/P1 or better by Standard & Poor's and Moody's Investors Services, respectively at the time of purchase.
 - (3) Limited to the Issuer's named in Appendix "A".
 - e) Corporate Fixed or Floating Rate Notes
 - (1) Collateralized at 102 percent.
 - (2) Rating must be "AA" or "Aa2" or higher by at least two NRSROs at the time of purchase.
 - (3) Limited to the Issuer's named in Appendix "A".