

INVESTMENT POLICY

City of Barre, Vermont

PURPOSE. In accordance with 24 V.S.A. § 1571(b), moneys received by the treasurer on behalf of the City of Barre may be invested and reinvested by the treasurer with the approval of the city council. The purpose of this Investment Policy is to establish the investment objectives, standards of investing prudence, eligible investments and transactions, internal controls, reporting requirements, and safekeeping and custodial procedures necessary for the proper management and investment of the funds of the City of Barre.

This Policy does not apply to trust funds held by the City of Barre, the investment of which are controlled by statute, charter or ordinance. It does not apply to bond fund investments made in accordance with applicable bond debenture requirements.

OBJECTIVES. City funds will be invested in separate accounts designated by their specific purpose and invested in a manner consistent with the time horizon, risk profile and goals of each separate account, in accordance with current professional investment standards. Considerations for investment of the funds of the City of Barre shall include safety, social responsibility, liquidity, yield, and local investment:

Safety. Safety of principal shall be a primary consideration in investments of City funds. Investments will be undertaken so as to limit risk as much as possible, while pursuing the goals of the various sub-accounts, in accordance with prudent investment standards.

Social Responsibility. The funds invested by the City shall only be invested in a manner which promotes the general welfare of the citizens of the City of Barre and State of Vermont. We seek to make investments in a manner that improves social and economic justice, and incorporates best-in class analysis of best practices in environmental, social, and governance issues as part of an investment screening process. As such, if a previous investment is found to no longer follow such a process, the City shall search for alternatives which demonstrate those principles. It should be expected that this policy will be updated as our understanding of social responsibility matures. Examples of socially responsible investments include those supporting renewable energy, supporting economic equity/reducing income inequality, supporting and encourage diverse populations, and encourage social responsibility in the entities in which we invest.

Liquidity. The City's investment portfolio will remain sufficiently liquid to meet all reasonably anticipated operating requirements. This will be accomplished by structuring the portfolio so that investments mature concurrent with cash needs to meet anticipated demands. The portfolio will consist primarily of securities with active secondary or resale markets. A portion of the portfolio may be placed in money market mutual funds to ensure liquidity for short-term funds.

Yield. The investment portfolio will be designed to attain a market rate of return throughout budget and economic cycles, taking into account the investment risk

constraints and liquidity needs. Return on investment is of secondary importance compared to the safety and liquidity objectives described above. The core of investments will be limited to relatively low-risk securities in anticipation of earning a fair return relative to the risk being assumed.

Local Investment. Where possible, funds may be invested for the betterment of the local economy. The City may accept a proposal from an eligible institution that provides for a reduced rate of interest, provided that such institution documents the use of deposited funds for community development projects. *Local investment is of tertiary importance compared to the safety, liquidity, and yield objectives described above.*

POOLING. Except where prohibited by law, cash and reserve balances from all funds will be consolidated to maximize investment earnings and to increase efficiencies with regard to investment pricing, safekeeping, and administration. Investment income will be allocated to various funds based on their respective participation and in accordance with generally accepted accounting principles.

STANDARD OF CARE. The standard of care to be used by the treasurer and city council shall be the prudent person standard and shall be applied in the context of managing an overall portfolio. 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.

CONFLICTS OF INTEREST. The city council and the treasurer shall refrain from personal business activity that could conflict with the proper execution and management of the City's investments or that could impair their ability to make impartial decisions, they shall disclose any material interests in financial institutions with which the City conducts business, and further disclose any personal financial or investment positions that could be related to the performance of the City's investments. City Council members and the treasurer shall refrain from undertaking personal investment transactions with the same individual with whom business is conducted on behalf of the City.

INTERNAL CONTROLS. The city council and treasurer will establish a system of internal controls, which shall be documented in writing to prevent the loss of invested funds arising from fraud, employee error, misrepresentation by third parties, unanticipated changes in financial markets, or imprudent actions by employees and officers of the City.

AUTHORIZED INVESTMENTS AND INSTITUTIONS. Public deposits shall only be made in qualified public depositories as established by Vermont law. All financial institutions and broker/dealers who desire to become qualified for investment transactions with the City must supply the following as appropriate:

1. Audited financial statements demonstrating compliance with state and federal capital adequacy guidelines;
2. Proof of National Association of Securities Dealers (NASD) certification;

3. Proof of state registration;
4. Certification of having read and understood and agreeing to comply with the City's investment policy;
5. Evidence of adequate insurance coverage.

The treasurer and city council will conduct an annual review of the financial condition and registration of all qualified financial institutions and broker/dealers.

The following investments will be permitted under this policy:

1. U.S. Treasury obligations which carry the full faith and credit guarantee of the United States government and are considered to be the most secure instruments available;
2. U.S. government agency and instrumentality obligations that have a liquid market with a readily determinable market value;
3. Certificates of deposit and other evidences of deposit at financial institutions;
4. Bankers acceptances;
5. Investment grade obligations of state and local governments and public authorities;
6. Repurchase agreements whose underlying purchased securities consist of the aforementioned instruments;
7. Money market mutual funds regulated by the Securities and Exchange Commission and whose portfolios consist only of dollar-denominated securities; and
8. Local government investment pools, either state-administered or developed through joint powers statutes, and other intergovernmental agreement legislation.
9. "Best in Class" investments; the City shall favor investments in companies that are leaders in their sectors while maintaining safety and demonstrating social responsibility.

COLLATERALIZATION. Collateralization utilizing obligations fully guaranteed by the full faith and credit of a Vermont municipality, the State of Vermont and/or the United States Government will be required on certificates of deposit and repurchase agreements. The current market value of the applicable collateral will at all times be no less than 102% of the sum of principal plus accrued interest of the certificates of deposit or the repurchase agreement secured by the collateral. Collateral will always be held by an independent party, in the City's name, with whom the City has a current custodial agreement. Evidence of ownership must be supplied to, and retained by, the City.

SAFEKEEPING AND CUSTODY. All trades of marketable securities will be executed by delivery vs. payment (DVP) to ensure that securities are deposited in an eligible financial institution prior to the release of funds. Securities will be held by an independent third-party custodian selected by the treasurer as 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 (Statement of Auditing Standards No. 70, or SAS 70).

The provisions in the proceeding paragraphs regarding collateralization, safekeeping and custody, and the execution of trades of marketable securities by delivery vs. payment (DVP) will not apply if an account for the City of Barre is held at a broker-dealer which is a member of SIPC (Securities Investor Protection Corporation).

Broker-dealers may trade and/or hold assets in firm name acting on behalf of and at the behest of the City of Barre without collateralization requirements as outlined in the preceding two paragraphs, provided that the account(s) at the broker-dealer is/are protected by SIPC. Such security through SIPC shall be considered to meet the requirements outlined in the preceding two paragraphs. Documentation of SIPC membership shall be provided to the City of Barre upon request.

REPORTING. The treasurer will prepare a quarterly investment report that analyzes the status of the current investment portfolio and the individual transactions executed over the last quarter. The report will include a listing of individual securities held at the end of the reporting period, realized and unrealized gains or losses resulting from appreciation or depreciation by listing the cost and market value of securities over one-year duration that are not intended to be held until maturity, average weighted yield to maturity of portfolio on investments as compared to applicable benchmarks, listing of investment by maturity date, and percentage of the total portfolio which each type of investment represents.

The foregoing Policy is hereby adopted as amended by the City Council and the treasurer of the City of Barre, Vermont, this 10th day of July, 2012 and is effective as of this date until amended or repealed.