University of Illinois System

Investment Policy Statement

September 18, 2025

Table of Contents

Purpose

The Investment Policy Statement provides the guiding principles for the University of Illinois System (the "system") to effectively supervise, monitor, and evaluate the investment of its financial assets. The Board of Trustees (the "Board") and its delegates intend to invest all available system funds in one of the system investment programs. The objective and time horizon of a fund will generally determine the appropriate investment program. The system attempts to pool assets whenever possible to provide efficient administration and investment flexibility.

Definitions

Long-Term Investment Pool (the "LTIP")

The LTIP is comprised of permanent core operating funds and endowment funds—including gifts that have been donated to the system to support research, academic, or capital programs; income funds related to system-held endowments; royalty income; and self-insurance funds. Endowment funds are defined as institutional funds and, under the terms of the gift instrument, are not wholly expendable by the institution on a current basis. Some may be restricted to a specific purpose whereas others may be entirely unrestricted. Management of these funds on a consolidated basis permits a pooled total return investment approach with a long-term investment horizon. Quasi-endowments established by the Comptroller are invested in the LTIP whenever feasible.

Operating Pool

The operating pool represents funds available for current use in support of the system's academic programs and support functions. These operating assets are budgeted to designated operations within the system. Operating funds are pooled to provide the system continuity of mission, investment flexibility, and efficient administration. The consolidated management of these funds also allows robust tracking and investment performance reporting, plus a larger base from which to meet demands for liquidity. All liquidity needs of the system will be met from these funds. This category primarily includes tuition and fees, student loan funds, self-insurance programs, and hospital and auxiliary operating funds.

Separately Invested Funds

Some funds are separately invested by the system in instances where the funds belong to another agency or entity; donor or legal restrictions prevent consolidation; or it is in the best interest of the system not to commingle the funds. Separately invested funds are invested in accordance with the funds' objective, duration, and investment restrictions. All revenue earned by these investments is separately maintained for expenditure in accordance with guidelines.

Separately invested funds include:

> **Agency Funds**
> Funds invested for the benefit of University Related Organizations.
>
> **Separately Invested Endowment Funds**
> Gifts from donors who have directed that the endowment fund may not be commingled, or the gift is non-marketable.

Construction Funds
Proceeds from bond issues or appropriations for specific purposes which are being temporarily invested until needed to fund construction expenditures.

Bond and Interest Sinking Funds and Debt Service Reserve Funds
Separately invested funds set aside to pay future debt service payments.

Office of Technology Management Stocks
Stock holdings where the system retains equity ownership representing licensing payments.

Sponsored Program Funds
Funds from University-sponsored programs which are projects and activities often involving research, teaching, training, or services, that are funded by external sources (like government agencies, foundations, or corporations) through formal agreements like grants or contracts.

Farmland

Farmland includes real estate comprised of agricultural land and related buildings acquired by the system through the generous gifts of donors. This policy does not apply to farms utilized by the College of Agricultural, Consumer and Environmental Sciences for research purposes.

Invested Assets

The system's investment pools defined above, including the LTIP, operating pool, and separately invested funds.

Roles and Responsibilities

Statutory Authority and Delegation of Investment Function

The Board of Trustees follows the State of Illinois Uniform Prudent Management of Institutional Funds Act, 760 ILCS 51/1-11, when managing the system's invested assets. The Board fulfills its fiduciary responsibility for the management of all invested assets through the development of the system's Investment Policy Statement, which strives to maximize investment return within a prudent level of risk. The Board has delegated the execution of the Investment Policy Statement to the Comptroller of the system. This delegation includes the establishment of financial relationships, such as banking relationships, money market funds, investment managers, investment consultants, custodians and other vendors directly related to the provision of investment management services, for the holding or management of the system's invested assets. This delegation enables the Comptroller, at his or her discretion, to hire and fire investment managers to meet the Board's asset allocation policies established herein.

Acting under the oversight of the Comptroller, the Office of Treasury Operations ('Treasury')/Investment staff oversees the development and management of investment programs and develops and disseminates guidelines and procedures regarding invested assets. The Senior Director of Investments is authorized to develop, install, and oversee the operations of suitable business systems and staffing to accomplish this function. Requests for exceptions to approved investment policies are to be addressed to the Comptroller.

The Board of Trustees

- The Board has fiduciary responsibility for the system's invested assets.
- The Board is responsible for establishing the system's investment policy, including approval of LTIP and operating pool asset allocation ranges.

Audit, Budget, Finance, and Facilities Committee

- Set forth recommendations to the Board regarding investment policy.
- Review the system's investment policy on a periodic basis.
- Review asset allocation and portfolio- and asset class-level performance on a quarterly basis.

Vice President/Chief Financial Officer and Comptroller

- Authorized to manage system investments at his/her discretion consistent with the Board's Investment policy.
- Regularly communicate with the Audit, Budget, Finance, and Facilities Committee and the system President on investment activities, including reporting on invested asset performance relative to benchmarks.
- Approves investment manager hiring and termination upon recommendation from investment staff.

- Retains delegated authority to buy or sell endowment real estate including farmland.
- Informs the Audit, Budget, Finance and Facilities Committee on material events affecting the system's invested assets.

Treasury Operations/Investment Staff

- Manage system invested assets consistent with the Investment Policy approved by the Board under direction of the Comptroller.
- Direct and manage day-to-day transactions with external investment managers.
- Work in conjunction with the investment consultant, as appropriate, to select and recommend hiring and termination of external investment managers.
- Work in conjunction with the investment consultant on the preparation of presentations and reporting materials for the Board's Audit, Budget, Finance, and Facilities Committee.
- Meet with the investment managers on a periodic basis to perform due diligence, including a review of investment performance, portfolio allocations, and market outlook.
- Inform the Comptroller of material events that are discovered or reported during the ongoing due diligence process.
- Review the investment policy statement periodically to ensure it is consistent with current circumstances and best practices. Recommendations for change will be brought to the Board's Audit, Budget, Finance, and Facilities Committee.

Investment Consultant

An objective, third-party consultant may be retained to assist the Comptroller, Board, and system investment staff in managing the overall investment process for the system's invested assets.

- Serve as an extension of system investment staff.
- Recommend changes to asset allocation and the Investment Policy Statement.
- Maintain a direct relationship with the underlying managers used by the system and conduct appropriate due diligence on the managers on an ongoing basis. Communicate important developments and recommendations for changes in assignments to investment staff when appropriate.
- Provide quarterly reports summarizing the investment performance of the operating pool and LTIP and individual investment managers.
- Assist with investment manager searches, as needed, including recommendation of potential candidates and associated due diligence.

Investment Managers

- Manage the system invested assets under their supervision in accordance with the guidelines and objectives outlined in the respective contract, service agreement, prospectus, limited partnership agreement, or similar account documentation.
- Exercise full investment discretion regarding buying, managing, and selling assets held in the portfolios.

- Use the same care, skill, prudence, and due diligence under the circumstances then prevailing that experienced investment professionals acting in a like capacity would use in the management of their own affairs, not regarding speculation, but in regard to the stewardship of their funds considering the probable income, risk, and preservation of capital.
- Provide regular statements to the system and its investment custodian on fund holdings and performance.

Custodian

- Provide or make available monthly portfolio performance, asset, and transaction reports.
- Provide the system, its investment managers, and investment consultant special reports as reasonably requested.
- Communicate immediately any concerns regarding portfolio transactions, valuation, or material changes in personnel or procedures.

Invested Assets

LTIP

Investment Objective

To ensure intergenerational equity, the investment objective is to preserve the real value, or purchasing power, of the LTIP assets and the annual support provided by these assets for an infinite period. The pool's objective is further defined over longer term periods (or a market cycle) as a hurdle rate of inflation plus spending and administrative fees, as summarized below:

Hurdle Rate ≥ Consumer Price Index + Spending Rate + Administrative Fees

The investment program attempts to balance current need and future support so that in the future an endowed system program will receive the same value of annual financial support as is currently provided.

Spending Policy

The purpose of the spending rate formula is to provide a stable income stream that keeps pace with inflation and does not degrade the real value of the corpus of the LTIP over time.

The LTIP spending policy is established as a percentage of a moving average of market value of the unitized LTIP. The spending formula and spending rate for the LTIP will be determined by the Comptroller and reported to the President and the Board prior to the beginning of each fiscal year.

Asset Allocation

Asset allocation is believed to be the key driver of investment returns. The system invests in a diversified multi-asset class portfolio consisting of investments that will generally fall into one of five asset categories: global equity, global fixed income, real assets, diversifying strategies, and cash. Each category serves a specific role within a portfolio. An allocation to all or a subset of the categories can provide diversification to major market risk factors and provides a simple framework to review the exposures within the portfolio. Within each asset category, investments shall be diversified further among economic sector, industry, geographic region, quality and size. The purpose of this diversification is to provide reasonable assurance that no single security or class of securities will have a disproportionate impact – positive or negative – on the overall performance of the LTIP. The target asset allocation seeks to balance the need for liquidity with the ability to generate higher returns through less liquid investments.

Asset Categories

Global Equity	Intended to be the primary source of long-term growth for the portfolio, as equities historically have produced high real rates of return. While having higher expected returns, they also have higher volatility. Includes both public and private equity.
Global Fixed Income	Intended to offset the volatility of equities, particularly during market downturns, as well as provide deflation protection. These investments are comprised primarily of fixed income (debt) securities. Includes both public and private debt.
Real Assets	Intended to insulate the portfolio from inflation shocks and to provide a source of non-correlated returns with other asset categories. May include both public and private investments in real estate, natural resources (*e.g.,* agriculture, timber, commodities), and infrastructure (*e.g.,* power generation, transportation).
Diversifying Strategies	Intended to provide diversification from systematic market risk, as the primary determinant of returns are typically from manager skill (alpha) rather than the market (beta). Includes non-directional strategies that seek low correlations to public equity and fixed income markets.
Cash	Intended to serve as a liquidity reserve to meet operational needs without disrupting long-term investment allocations. These assets provide flexibility for rebalancing and serve as a temporary holding vehicle for unallocated or transitioning capital. Cash holdings are not expected to materially contribute to long-term returns, but they play a critical role in liquidity management. The allocation may include high-quality, short-term instruments such as government money market funds, prime money market funds, and other cash-equivalent securities that offer daily liquidity and minimal credit or interest rate risk.

The target asset allocation of the LTIP is intended to ensure the investment objectives are met and that the portfolio is broadly diversified. The target asset allocation is bounded by allocation ranges and provides guidance concerning whether asset categories are underweight or overweight relative to the target allocation. Interim target allocations may be applied when immediate investment into certain asset classes is not reasonably feasible or prudent.

The table below illustrates the target asset allocation and ranges deemed appropriate for the LTIP by the Board.

Asset Category	Sub-Asset Class	Target Allocation (%)	Allocation Ranges (%)
Global Equity		**65%**	**55 – 75%**
	U.S. Equity	32%	
	Non-U.S. Equity	18%	
	Private Equity	15%	
Global Fixed Income		**16%**	**11 – 21%**
Real Assets		**9%**	**4 – 14%**
Diversifying Strategies		**9%**	**4 – 14%**
Cash		**1%**	**0 – 3%**

The following target guidelines have been applied in addition to the target allocations and ranges above to provide supplemental guidance:

- No less than 55% of the total portfolio market value will be invested in liquid, public markets with at least weekly available redemptions.
- Up to 6% of the total portfolio market value may be invested in private credit, high yield or other non-core fixed income strategies.

Rebalancing

The LTIP will be rebalanced monthly based on cash flow requirements and in alignment with the asset allocation policy. The purpose of rebalancing is to control risk and maintain the policy allocation within ranges approved by the Board. Available cash flows may be strategically utilized to facilitate rebalancing, minimizing transaction costs and reducing the need for discretionary asset sales.

Performance Evaluation

The LTIP net-of-fee rate of return is compared with:

- A weighted-average benchmark of the returns of broad market indices representing the asset classes in the target allocation established by the Board:

Index	Allocation Weight (%)
Russell 3000 Index	32%
MSCI All Country World ex-U.S. Index	18%
Bloomberg Barclays Capital Aggregate Bond Index	16%
HFRI Fund of Funds: Conservative Index	9%
LSEG – All PE Index*	15%
NCREIF ODCE Index**	9%
Vanguard Spliced Real Estate Index**	Market Value-Adjusted
NCREIF Corn Belt Index**	Market Value-Adjusted
Bloomberg Barclays 90-Day T-Bill	1%

  * The weighted average benchmark may be adjusted to reflect times when the system is not fully invested in nontraditional investments (*e.g.,* private equity).

  ** THE NCREIF ODCE Index will be reduced by the market value weights of the Real Estate Investment Trust (REIT) and a residual private farmland allocation.

- The returns of a universe of funds with similar objectives (*i.e.,* comparable endowments and foundations)
- A measure of relative purchasing power whereby the primary inflation measure used to determine purchasing power is the Consumer Price Index

Permitted Investments

The LTIP may invest in any kind of property or type of investment. Investments may be structured as separate accounts, pooled funds (*e.g.,* mutual funds, common trust funds), limited partnerships or direct investments in securities or exchange-traded vehicles.

Quasi-Endowments

Quasi-endowment funds are established by the Comptroller to function like an endowment, with the funds typically invested in the commingled LTIP. However, these funds may be removed from the LTIP and expended at the discretion of the Comptroller in accordance with the gift agreement.

Operating Pool

Investment Objective

Operating funds are invested to preserve value and safety of the principal, generate income, maintain liquidity appropriate to the forecasted working capital requirements of the system, provide prudent diversification of investments, and maximize the rate of return on investment.

Liquidity Distribution

The liquidity distribution strategy for the operating pool consists of investing funds within four liquidity layers. The decision to allocate funds across these layers involves a careful balance of fulfilling the operating pool portfolio's investment objectives and, at the same time, understanding the system's ability and willingness to assume investment risk in the portfolio. Funds expected to be used within one year are invested in the primary liquidity layer to ensure they are available for expenditure. The longer-time horizon investments, including core and permanent core, are expected to provide higher rates of return. These longer maturity investments will experience some variation in market value as capital market conditions change. This market value variation is acceptable since these investments are not expected to be utilized to meet immediate liquidity needs.

It is system policy to invest its operating funds in the approximate proportions as set forth in the table below identifying the operating pool's liquidity layers, benchmarks, and policy allocation ranges.

Liquidity Layer	Role in Operating Portfolio	Investment Time Horizon	Relative Risk Tolerance	Benchmark (or equivalent)	Target Policy Range
Primary Liquidity	Meet cash flow needs/ downside protection	Immediate	Low	Bloomberg 90-Day & 12-Month Treasury Bill Index	30% - 75%
Liquid Core	Earn yield/ downside protection	1 – 3 years	Low	Bloomberg One- to Three-Year Government and Government/ Credit Index	10% - 40%
Core	Earn yield/ total return	3 – 5 years	Low-moderate	Bloomberg Intermediate Aggregate and Government Credit Index	10% - 40%
Permanent Core	Total return	5+ years	Moderate-high	System LTIP benchmark	5% - 25%

Permissible Investments

The system's primary liquidity, liquid core, and core layers shall be invested in fixed income securities and short-term (*e.g.,* money market) instruments. Fixed income securities shall be rated "Baa3" or better by Moody's or Standard & Poor's or equivalent at purchase. Unrated securities are only allowed when specifically permitted by an individual manager's guidelines.

The system's permanent core operating funds shall be invested in the system's LTIP investment program.

The system Comptroller and investment managers shall not invest in any security which, in their opinion, entails a material probability of default.

Diversification

The total operating pool will be broadly diversified across securities to reduce the impact of losses in individual investments in a manner that is consistent with fiduciary standards of diversification. This diversification shall be achieved by employing multiple investment managers and by imposing a 5% maximum position limit with the exception of U.S. Treasury securities, U.S. government agency securities, tri-party repurchase agreements and money market funds.

Liquidity

Treasury will be responsible for maintaining adequate cash balances for the liquidity needs of the system and Investment staff will advise the external managers of any anticipated need for cash withdrawals as such needs become known.

Performance Evaluation

Investment staff will report and evaluate performance on a net-of-fee basis. The total operating pool rate of return will be measured against the operating pool benchmark. The benchmark return is calculated using a weighted average of manager-specific benchmarks, based on beginning-of the month market values. Monthly benchmark returns are geometrically linked to reflect overall benchmark performance for the pool. The indices to be used in the weighted average and the ranges within which the weights will fall are displayed in the preceding table.

Operating Pool Income Distribution

Operating pool income is distributed at the discretion of the Comptroller. Applicable external investment management, custody, bank, and internal fees (*i.e.,* operating budget of select functions within the System Office) reduce the amount of investment income. University Accounting and Financial Reporting ('UAFR') ensures the proper recording of all investment income and related expenses and the allocation of net investment income to the appropriate fund groups. Net accrued investment income is allocated quarterly to campus units or entities with ownership of the funds. Deficit cash balances reduce the total cash balance for a given campus, fund group, or entity. Any campus, fund group, or entity in a total deficit position will not receive an income distribution except to the extent required by federal, state, or system regulations or policies.

Separately Invested Funds

Agency Funds

The system may invest funds for system related entities such as student organizations, clubs or academic consortia. The objective is to invest these funds to preserve the value and safety of the principal and maintain liquidity appropriate to the forecasted working capital requirements of the agency.

Separately Invested Endowment Funds

The objective for separately invested endowment funds is to preserve the purchasing power of the funds and the associated income. Separately invested endowments follow, as nearly as possible, the LTIP investment program adopted by the Board while adhering to any special restrictions prohibiting participation in the LTIP program.

Investment returns on separately invested endowment funds will be compared with the returns of broad market indices representing the asset classes established for the separately invested endowment funds.

Construction Funds

Plant funds earmarked for construction and construction funds generated through debt issues are separately invested to meet bond covenants and to foster project accountability. Investment of these funds will follow the Illinois Public Funds Investment Act (30 ILCS 235), but the maturity structure will be guided by projected cash flows. Construction funds receive interest from the investment of these funds prior to expenditure.

Bond and Interest Sinking Funds and Debt Service Reserve Funds

Bond and interest sinking funds include the mandatory transfers from operating units for payment of principal and interest on the system's outstanding debt. Debt service reserve funds are normally held by the system, or its agent, as a requirement of bond covenants for outstanding system bond issues. The specific bond covenant determines the type of funds required to be held by the system and any limitations on the income earned on those funds. Debt service reserve funds are retained in the event the system defaults on a bond payment. All investment income earned on bond and interest sinking funds and debt service reserve funds must be used for debt payments.

Office of Technology Management Stocks

The Office of Technology Management's ('OTM') mission is to encourage innovation, enhance research and facilitate economic development through the transfer of intellectual property. OTM receives securities from companies representing payment in lieu of cash for certain technology licensing. Given the early stage of the companies licensing the technology, these securities are difficult to value. The system has adopted a procedure for valuing these securities. Security values will be adjusted, at such time, if any, that they become marketable or trade over-the-counter or on an exchange.

Sponsored Programs Funds

University-sponsored programs are projects and activities, often involving research, teaching, training, or services, that are funded by external sources (like government agencies, foundations, or corporations) through formal agreements like grants or contracts. These programs can be funded by various sources, including federal and state agencies, private foundations, corporations, and non-profit organizations. These agreements establish terms and conditions for performance, which may include provisions for separately investing any excess funds until they are used.

Farmland

Gifts of Endowment Farm Real Estate
Treasury and the Office of University Counsel process prospective gifts of real estate, including farm real estate. For prospective farm real estate gifts, professionals from these offices review the proposed gift before acceptance to:

- Evaluate farm properties for productive quality and ability to generate total returns sufficient for the donor's intentions. Specific restrictions donors may have directed as a condition of the gift will be considered as part of the evaluation.
- Inspect prospective gift properties and recommend further analysis of possible environmental or other issues, if warranted.
- When appropriate, recommend and obtain title search on farm properties prior to final acceptance of the gift.
- A formal appraisal of the gift property will occur at the time of its acceptance.

Evaluation of Endowment Farm Real Estate for Retention or Sale

Endowment farm real estate, where the sale is not restricted by the donor as a condition of the gift, may be evaluated at the time of the gift and periodically thereafter to determine if selling one or more parcels would be the most appropriate strategy. Proceeds from the sale of endowment farm real estate will either be reinvested in the system's LTIP or distributed in accordance with the donor's written intentions. The annual payout from the earnings on the reinvested assets resulting from the endowment farm real estate sale will fully support the defined purposes and intentions of the respective donor(s).

Management and Oversight

Farmland is a long-term investment. Accordingly, the management of farmland will be conducted with a total return concept to preserve or improve the real value of the asset over a potentially infinite period. When a gift of farm real estate is accepted and maintained as part of the endowment farm real estate portfolio, the management of such assets will include practices to:

- Adhere to donor intentions as prescribed in the governing documents.
- Optimize returns by employing prevailing market-based management practices.
- Protect the long-term productivity of farmland assets through ongoing monitoring of soil fertility, drainage conservation, and sustainability.
- Ensure the use of practical farming practices and compliance with environmental protection rules and regulations.
- Employ professional farm management practices including consultation with agricultural expertise from industry and academia.
- Obtain an annual estimate of the current market value of all endowment farm real estate assets through independent, professional appraisal-based valuations.

- Make annual payments in lieu of taxes to real estate taxing bodies to support local governments and services.

Selection of Operators for Endowment Farm Real Estate

Operators of endowment properties will be selected through a ‘best candidate approach’. This approach assesses potential farm operators based on a wide range of factors, including farming experience, land stewardship, center of operations location, educational background and financial capabilities. The intent of the farm operating selection process is to achieve the best long-term stewardship and value of the endowments and best serve the interest of our donors. Typically an instance of operator change will be precipitated by a retirement or non-performance event. Farm operators may be retained on a multi-year operating agreement assuming satisfactory performance.

Farm Real Estate Operating Agreements

Endowment farm real estate will be rented to operators under cash rent, flexible cash rent or crop share agreements unless dictated otherwise by the donor or exempted by the Comptroller.

Reporting

Treasury will request its designated farm manager to prepare a calendar year performance report on endowment farm real estate. Performance will be computed on a total return basis and compared with the NCREIF Corn Belt Index. The report shall contain the current estimate of the market value of each parcel of farm real estate in the portfolio as determined by an independent appraiser, the total return on endowment farm real estate, details on any endowment farm real estate gifted to the system within the year, and information on farm real estate portfolio transactions.

Policies, Guidelines and Practices

Investment Manager Selection and Retention

Investment managers will be selected by investment staff in consultation with the system's investment consultant and recommended to the Comptroller for hiring approval.

Criteria used to evaluate investment managers during the search process will include, but are not limited, to the following:

1. Registration with appropriate regulatory authorities.
2. Experience of the firm in the management of institutional portfolios operated under prudent person standards.
3. Qualifications and/or depth of the professional staff.
4. Soundness of the firm's investment philosophy and process.
5. The investment record of the firm and/or the firm's principals in former associations where the record is verifiable.
6. The adequacy of the firm's trading, back office, accounting and reporting, and client service capabilities.
7. Investment management fees.
8. Sustainable investing practices employed by the firm.

Regarding performance, the primary measurement will be the manager's returns (net of fees) versus the relevant and agreed upon benchmark. Failure of a manager to generate excess returns in a short period of time does not require that the contract with the firm be terminated. However, the firm's returns must be within an acceptable range. A secondary performance measure is the manager's returns relative to a universe of returns of managers with similar styles.

Reasons for investment manager termination may include but are not limited to: changes in investment style and discipline, changes in the firm (*e.g.,* personnel, organizational structure) which may detract from future performance, changes in the system's Investment Policy eliminating the need for the manager, loss of confidence that the firm will add value and material legal or regulatory infractions.

Reporting and Review

The consultant and investment staff will prepare and deliver quarterly investment and performance reports on the invested assets for review by the Comptroller and Board. The Comptroller or his or her designee shall deliver an investment presentation, at least annually, to the Audit, Budget, Finance, and Facilities Committee of the Board.

Internal Controls

The CFO and investment staff have established a system of internal controls designed to prevent losses that might arise from fraud, employee error, misrepresentation by third parties or imprudent actions by employees of the entity. This includes, but is not limited to, segregation of duties, calculation of market values and returns by internal and external parties and initial and ongoing due diligence of investment managers by investment staff and the designated investment consultant.

Sustainable Investing

In accordance with the Illinois Sustainable Investing Act (30 ILCS 238/), investment staff will strive to prudently integrate environmental impact, social impact and governance factors across the investment program, including investment decision-making, investment analysis, portfolio construction, due diligence and investment ownership. Factors to be considered may include but are not limited to: (1) corporate governance and leadership factors; (2) environmental factors; (3) social capital factors; (4) human capital factors; and (5) business model and innovation factors.

Bank Deposit Collateral Guidelines

In accordance with 30 ILCS 105/6d (2), whenever funds are deposited with a bank or savings and loan association and the amount of the deposit exceeds the amount of federal deposit insurance coverage, the system requires that bonds or pledged securities be held as collateral. Only the types of securities which the State Treasurer may, in his/her discretion, accept under Section 11 of the Deposit of State Moneys Act may be accepted as pledged securities. The market value of the bond or pledged securities shall at all times be equal to or greater than the uninsured portion of the deposit.

Derivative Securities

For the purposes of this policy, a derivative instrument is defined as any contract or investment instrument whose performance, risk characteristics or value is derived from any asset, interest rate or index value.

Derivatives are permitted to be used for the following purposes:

1. To gain broad stock or bond market exposure in a manner that does not create the effect of excessive leverage in the overall portfolio.

2. To convert financial exposure in a given currency to that of another currency (*e.g.,* hedge Japanese Yen exposure back to the U.S. dollar).

3. To adjust the duration of a bond portfolio in a manner that is consistent with the accepted approach of the manager and other policies and guidelines provided to the manager.

4. To make portfolio adjustments that are consistent with the system's investment policies and guidelines and that, when viewed from a total portfolio standpoint, do not materially increase expected volatility in the portfolio.

With the exception of investment managers (*e.g.,* hedge funds, real estate) so authorized, derivatives will not be used to leverage portfolios, and derivative-based investment strategies will not expose the portfolios to excessive risk.

Investment managers are expected to have internal risk management programs in place to ensure that derivative-based strategies do not result in magnified risks to the portfolio.

Compliance, Ethics and Conflicts of Interest

Each person acting on behalf of the system shall comply with all applicable State of Illinois statutes, as well as system statutes, general rules, bylaws and policies. This includes, but is not limited to, the above cited State of Illinois Uniform Prudent Management Institutional Funds Act as well as the Illinois Governmental Ethics Act, 5 ILCS 420, and the State Officials and Employees Ethics Act, 5 ILCS 430, which set forth guidelines for professional conduct by those acting on behalf of the system.

In addition, no person involved in the investment process shall make any investment decision based upon personal or political gain or consequence.