

## Compiled Policy Manual

<b>Title:</b>	<b>Investment Policy</b>
<b>Adoption Date:</b>	<b>June 15, 1998</b>
<b>Revision Date:</b>	<b>June 20, 2016</b>

### 1. Policy

It is the policy of Delta Charter Township (“the Township”) to invest funds in a manner which will provide preservation of capital, meet the daily liquidity needs of the Township, diversify the Township’s investments, conform to all local and state statutes governing the investment of public funds, and generate market rates of return.

This Investment Policy addresses the methods, procedures and practices which must be exercised to ensure effective and judicious fiscal and investment management of the Township’s funds. It replaces any previous investment policy or investment procedures of the Township.

This Investment Policy was adopted by resolution of the Township Board on June 20, 2016.

### 2. Scope

This investment policy applies to all financial assets of the Township. These assets are accounted for in the various funds of the Township’s Annual Financial Audit Report and include:

- General Fund
- Special Revenue Funds
- Internal Service Funds
- Capital Project Funds
- Enterprise Funds
- Trust and Agency Fund
- Debt Service Funds
- Component Units
- Any new fund created by the Township, unless specifically exempted by the Township Board.

This policy does not apply to pension, deferred compensation, and retiree healthcare trust fund assets which are administered externally, and not subject to Act 20, P.A. of 1943; as amended.

Cash may be pooled for investment purposes. The investment income derived from the pooled investment account shall be allocated to the contributing funds based upon the proportion of the respective average daily balances relative to the total pooled balance in the investment portfolio.

### **3. Investment Objectives**

The Township's principal investment objectives are:

- Preservation of capital and protection of investment principal.
- Maintenance of sufficient liquidity to meet anticipated cash flows.
- Attainment of a market rate of return.
- Diversification to avoid incurring unreasonable market risks.
- Conformance with all applicable Township policies, State statutes, and Federal regulations.

### **4. Delegation of Authority**

In accordance with Section 121.91 of Act 20 of 1943, as amended, the Township Board has designated the Finance Director as the Township's Investment Officer. As such, the Finance Director is vested with the responsibility for managing the Township's investment program and for implementing this Investment Policy. The Finance Director may delegate the authority to conduct investment transactions and to manage the operation of investment portfolio to other specifically authorized staff members. No person may engage in an investment transaction except as expressly provided under the terms of this Investment Policy.

The Finance Director shall establish written procedures and internal controls for the operation of the Township's investment program, designed to prevent loss of public funds due to fraud, error, misrepresentation, and imprudent actions.

The Township may engage the support services of outside investment advisors in regard to its investment program, so long as it can be demonstrated that these services produce a net financial advantage or necessary financial protection of the Township's financial resources.

### **5. Prudence**

The standard of prudence to be used for managing the Township's assets is the Michigan Prudent Investor Rule, found in Section 700.1502 of Act 386 of 1998. It states, "A fiduciary shall invest and manage assets held in a fiduciary capacity as a prudent investor would, taking into account the purposes, terms, distribution requirements expressed in the governing instrument, and other

circumstances of the fiduciary estate. To satisfy this standard, the fiduciary must exercise reasonable care, skill, and caution.”

The Township’s overall investment program shall be designed and managed with a degree of professionalism that is worth of the public trust. The Township recognizes that no investment is totally riskless and that the investment activities of the Township are a matter of public record. Accordingly, the Township recognizes that occasional measured losses may be desirable in a diversified portfolio and shall be considered within the context of the overall portfolio’s return, provided that adequate diversification has been implemented and that the sale of a security is in the best long-term interest of the Township.

The Finance Director and other authorized persons acting in accordance with written procedures 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 to the Township Board and appropriate action is taken to control adverse developments.

#### **6. Ethics and Conflicts of Interest**

Township employees involved in the investment process shall refrain from personal business activity that could conflict with proper execution of the Township’s investment program, or that could impair or create the appearance of an impairment of their ability to make impartial investment decisions. Employees shall disclose to the Township Manager any material financial interests in financial institutions that conduct business with the Township.

#### **7. Selection of Authorized Financial Institutions and Broker/Dealers**

The Finance Director shall maintain a list of authorized financial institutions and broker/dealers approved for investment purposes by the Township Board and it shall be the policy of the Township to purchase securities only from those authorized firms. Financial institutions on this list shall be reviewed periodically based on rating agency reports but no less than annually.

All financial institutions and broker/dealers who desire to become qualified bidders for investment transactions must supply the Finance-Director with the following: audited financial statements for the most recent fiscal year; certification of having received the Township’s investment policy and agreement to comply with its terms (see Appendix I); proof of National Association of Security Dealers certification; and proof of State registration, where applicable.

Alternatively, if the Township has engaged the services of an investment advisory firm, the authorized Investment Advisor may utilize the Investment Advisor's list of broker/dealers when executing transactions on behalf of the Township. The Investment Advisor's approved list of broker/dealers shall be provided to the Township on an annual basis or upon request. In addition, the authorized Investment Advisor shall provide a written receipt of this Investment Policy and agreement to conduct transactions on behalf of the Township in accordance with this Investment Policy. The authorized Investment Advisor shall provide such certification on an annual basis or upon any revision to this Investment Policy.

## **8. Authorized Securities and Transactions**

Investments for the Township shall be made in accordance with Act 20 of 1943 as amended, MCL 129.91-129.96, Investment of Surplus Funds of Political Subdivisions, and Act 40 of 1932, as amended, MCL 129.12-129.14, Depositories for Public Moneys. Any revisions or extensions of these statutes will be assumed to be part of this Investment Policy immediately upon being enacted.

This Investment Policy further restricts the investment of Township funds to the following types of securities and transactions:

U.S. Treasury Obligations: Treasury bills, Treasury notes, Treasury bonds, and Treasury STRIPS with maturities not exceeding ten years from the date of trade settlement.

Federal Instrumentality Securities: Debentures, discount notes, callable securities, step-up securities and stripped principal or coupons with maturities not exceeding ten years from the date of trade settlement.

Non-negotiable Certificates of Deposit in financial institutions as defined in MCL 129.16, that are eligible to be a depository of funds belonging to the State of Michigan with maturities not exceeding ten years from the date of trade settlement. Not more than 25% of the Township's total portfolio may be invested in certificates of deposit of any one financial institution.

Commercial Paper with an original maturity of 270 days or less that is rated within the two highest classifications at the time of purchase by at least two Nationally Recognized Statistical Rating Organizations (NRSROs). Not more than 25% of the Township's portfolio may be invested in the commercial paper of any one issuer, and the aggregate investment in commercial paper shall not exceed 70% of the Township's total portfolio.

Obligations of Michigan or any of its political subdivisions with maturities not exceeding ten years from the date of trade settlement that are rated at the time of purchase A, A2 or the equivalent by at least one NRSRO. The aggregate investment in such obligations shall not exceed 40% of the Township's total portfolio.

Money Market Mutual Funds registered under the Investment Company Act of 1940 that: 1) are "no-load" (no commission or fee shall be charged on purchases or sales of shares); 2) have a constant net asset value of \$1.00 per share; 3) limit assets of the fund to securities authorized in MCL 129.91 as legal investments; 4) have a maximum stated maturity and weighted average maturity in accordance with Rule 2a-7 of the Investment Company Act of 1940; and 5) have a rating of AAA or the equivalent by one or more NRSROs.

Joint Interlocal Investment Ventures organized under Act 7 of 1967, MCL 124.501 to 124.512, Urban Cooperation Act of 1967 (Ex Sess.), that are "no-load"; have a constant net asset value per share of \$1.00; limit assets of the fund to securities authorized in MCL 129.91 as legal investments; have a maximum stated maturity and weighted average maturity in accordance with Rule 2a-7 of the Investment Company Act of 1940; and are rated AAA, Aaa or the equivalent by a NRSRO.

Investment Pools organized under Act 367 of 1982, MCL 129.111 to 129.118, Surplus Funds Investment Pool Act, that are "no-load"; have a constant net asset value per share of \$1.00; limit assets of the fund to securities authorized in MCL 129.91 as legal investments; have a maximum stated maturity and weighted average maturity in accordance with Rule 2a-7 of the Investment Company Act of 1940; and are rated AAA, Aaa or the equivalent by a NRSRO.

Investment Pools organized under Act 121 of 1985, MCL 129.141 to 129.150, Local Government Investment Pool Act that are "no-load"; have a constant net asset value per share of \$1.00; limit assets of the fund to securities authorized in MCL 129.91 as legal investments; have a maximum stated maturity and weighted average maturity in accordance with Rule 2a-7 of the Investment Company Act of 1940; and are rated AAA, Aaa or the equivalent by a NRSRO.

It is the intent of the Township that the foregoing list of authorized securities be strictly interpreted. Any deviation from this list must be pre-approved by the Township Board.

It is the intent of the Township to diversify the investments within the portfolio to avoid incurring unreasonable risks inherent in over-investing in specific instruments, individual financial institutions or maturities. The asset allocation in the portfolio should be flexible depending upon the outlook for

the economy, the securities markets and the Township's anticipated cash flow needs.

**9. Investment Maturity, Liquidity, and Cash Management**

The portfolio shall remain sufficiently liquid to meet all cash requirements that may be reasonably anticipated. To the extent possible, investments shall be matched with anticipated cash flows and known future liabilities. Investments shall be limited to maturities not exceeding ten years from the date of trade settlement, unless specifically authorized by the Township Manager and Treasurer.

**10. Safekeeping and Custody**

The Township Board shall approve one or more banks to provide safekeeping and custodial services for the Township. A Township approved safekeeping agreement shall be executed with each custodian bank. To be eligible, a bank must be eligible to be a depository of funds belonging to the State of Michigan.

The purchase and sale of securities and repurchase agreement transactions shall be settled on a delivery versus payment basis. Ownership of all securities shall be perfected in the name of the Township. Sufficient evidence to title shall be consistent with modern investment, banking and commercial practices.

All investment securities, except non-negotiable Certificates of Deposit, Investment Pools, Joint Interlocal Investment Ventures and Money Market Mutual Funds, purchased by the Township will be delivered by book entry and will be held in third-party safekeeping by the Township approved custodian bank, its correspondent bank or the Depository Trust Company (DTC).

The Township's custodian will be required to furnish the Township monthly reports of holdings of securities as well as a report of monthly safekeeping activity.

**11. Performance Benchmarks**

The Township's investment portfolio shall be designed to attain a market rate of return throughout budgetary and economic cycles, taking into account prevailing market conditions, risk constraints for eligible securities, and cash flow requirements. The performance of the portfolio shall be compared to the average yield on the U.S. Treasury security that most closely corresponds to the portfolio's weighted average effective maturity.

**12. Reporting**

Monthly, the Finance Director shall submit to the Township Manager and Treasurer, and quarterly to the Township Board, an investment report listing the investments held by the Township, the current market value of the investments and performance results. The report shall include a summary of investment earnings during the period.

Annually, the Finance Director shall submit to the Township Board a report of the Township's investment program in a form acceptable to the Township Manager.

**13. Investment Policy Adoption**

The Investment Policy shall be adopted by resolution of the Township Board. It shall be reviewed annually by the Finance Director, Township Manager, and Township Treasurer and may be amended by the Township Board as conditions warrant.

Appendix I

Broker/Dealer Certification

I certify that I have received a copy of the Investment Policy of Delta Township which was adopted June 20, 2016, and I agree to comply with the terms of the policy regarding the buying or selling of securities.

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Signed

\_\_\_\_\_  
Title

\_\_\_\_\_  
Firm Name

\_\_\_\_\_  
Date

## **GLOSSARY**

**ACT 20 OF 1943:** Michigan Laws, regulating municipal investments, as amended.

**ACT 196 OF 1997:** which amended Public Act 20 of 1943.

**AGENCIES:** Federal agency securities.

**BID:** The price offered by a buyer of securities. (When you are selling securities, you ask for a bid.) See Offer.

**BROKER:** A broker brings buyers and sellers together for a commission.

**CERTIFICATE OF DEPOSIT (CD):** A time deposit with a specific maturity evidenced by a certificate. Large-denomination CD's are typically negotiable.

**COLLATERAL:** Securities, evidence of deposit or other property, which a borrower pledges to secure repayment of a loan. Also refers to securities pledged by a bank to secure depositions of public monies.

**COUPON:** (a) The annual rate of interest that a bond's issuer promises to pay the bondholder on the bond's face value. (b) A certificate attached to a bond evidencing interest due on a payment date.

**DEALER:** A dealer, as opposed to a broker, acts as a principal in all transactions, buying and selling for his own account.

**DEBENTURE:** A bond secured only by the general credit of the issuer.

**DELIVERY VERSUS PAYMENT or RECEIPT:** There are two methods of delivery of securities, delivery versus payment and delivery versus receipt. Delivery versus payment is delivery of securities with an exchange of money for the securities. Delivery versus receipt is delivery of securities with an exchange of a signed receipt for the securities.

**DERIVATIVES:** (1) Financial instruments whose return profile is linked to, or derived from, the movement of one or more underlying index or security, and may include a leverage factor, or (2) financial contracts based upon estimated amounts whose value is derived from an underlying index or security (interest rates, foreign exchange rates, equities or commodities).

**DISCOUNT:** The difference between the cost price of a security and its maturity when quoted at lower than face value. A security selling below original offering price shortly after sale also is considered to be at a discount.

**DISCOUNT SECURITIES:** Non-interest bearing money market instruments that are issued at a discount and redeemed at maturity for full face value, e.g. U.S. Treasury Bills.

**DIVERSIFICATION:** Dividing investment funds among a variety of securities offering independent returns.

**FEDERAL CREDIT AGENCIES:** Agencies of the Federal government set up to supply credit to various classes of institutions and individuals, e.g. S&L's, small business firms, students, farmers, farm cooperatives and exporters.

**FEDERAL DEPOSIT INSURANCE CORPORATION (FDIC):** A federal agency that insures bank deposits, currently up to \$100,000 per deposit.

**FEDERAL FUNDS RATE:** The rate of interest at which Federal funds are traded. The Federal Reserve through open-market operations currently pegs this rate.

**FEDERAL HOME LOAN BANKS (FHLB):** The institutions that regulate and lend to saving and loan associations. The Federal Home Loan Banks plays a role similar to that played by the Federal Reserve Banks vis-à-vis member commercial banks.

**FEDERAL NATIONAL MORTGAGE ASSOCIATION (FNMA or Fannie Mae):** FNMA, like GNMA was chartered under the Federal National Mortgage Association Act in 1938. FNMA is a federal corporation working under the auspices of the Department of Housing and Urban Development (HUD). It is the largest single provider of residential mortgage funds in the United States. Fannie Mae, as the corporation is called, is a private stockholder-owned corporation. The corporation's purchases include a variety of adjustable mortgages and second loans, in addition to fixed-rate mortgages. FNMA's securities are also highly liquid and are widely accepted. FNMA assumes and guarantees that all security holders will receive timely payment of principle and interest.

**FEDERAL OPEN MARKET COMMITTEE (FOMC):** Consists of seven members of the Federal Reserve Board and five of the twelve Federal Reserve Bank Presidents. The President of the New York Federal Reserve Bank is a permanent member, while the other Presidents serve on a rotating basis. The Committee periodically meets to set Federal Reserve guidelines regarding purchases and sales of Government Securities in the open market as a means of influencing the volume of bank credit and money.

**FEDERAL RESERVE SYSTEM:** The central bank of the United States created by Congress and consisting of a seven member Board of Governors in Washington, D.C., 12 regional banks and about 5,700 commercial banks are members of the system.

**FINANCIAL INSTITUTION:** A state or nationally chartered bank or a state or federally chartered savings and loan association, savings bank, or credit union whose deposits are insured by an agency of the United State government and that maintains a principal office or branch office located in this state under the laws of this state or the United States.

**FUNDS:** The money of a public corporation, the investment of which is not otherwise subject to a public act of this state or bond authorizing ordinance or resolution of a public corporation that permits investment in fewer than all of the investment options listed in subsection (1) or imposes one or more conditions upon an investment in an option listed in subsection (1) of Section 1 of Act 196 of 1997, amending Act 20 of 1943.

**GOVERNING BODY:** The legislative body, council, commission, board, or other body having legislative powers of a public corporation.

**LIQUIDITY:** A liquid asset is one that can be converted easily and rapidly into cash without a substantial loss of value.

**LOCAL GOVERNMENT INVESTMENT POOL (LGIP):** The aggregate of all funds from political subdivisions that are placed in the custody of the State Treasurer for investment and reinvestment.

**MARKET VALUE:** The price at which security is trading and could presumably be purchased or sold.

**MATURITY:** The date upon which the principal or stated value of an investment becomes due and payable.

**MONEY MARKET:** The market in which short-term debt instruments (bills, commercial paper, banker's acceptances, etc.) are issued and traded.

**PORTFOLIO:** Collection of securities held by an investor.

**PRIMARY DEALER:** A group of government securities dealers who submit daily reports of market activity and positions and monthly financial statements to the Federal Reserve Bank of New York and are subject to its informal oversight. Primary dealers include Securities and Exchange Commission (SEC) - registered securities broker-dealers, banks, and few unregulated firms.

**PRUDENT PERSON RULE:** An investment standard. In some states, the law requires that a fiduciary, such as a trustee, may invest money only in a list of securities selected by the custody state-the so-called legal list. In other state, the trustee may invest in a security if it one which would be bought by a prudent person of discretion and intelligence who is seeking a reasonable income and preservation of capital.

**PUBLIC CORPORATION:** A county, city, village, township, port district, drainage district, special assessment district, or metropolitan district of this state, or a board, commission, or another authority or agency created by or under an act of the legislature of this state.

**QUALIFIED PUBLIC DEPOSITORIES:** A financial institution which does not claim exemption from the payment of any sales or compensating use or ad valorem taxes under the laws of this state, which has segregated for the benefit of the commission eligible collateral having a value of not less than its maximum liability and which has been approved by the Public Deposit Protection Commission to hold public deposits.

**RATE OF RETURN:** The yield obtained on a security based on its purchase price or its current market price.

**REPURCHASE AGREEMENT (RP OR REPO):** An agreement of one party to sell securities at a specified price to a second party and a simultaneous agreement of the first party to repurchase.

**SAFEKEEPING:** A federal reserve bank or other institution, which is qualified to hold securities for safekeeping.

**SECONDARY MARKET:** A market made for the purchase and sale of outstanding issues following the initial distribution.

**SECURITIES & EXCHANGE COMMISSION:** Agency created by Congress to protect investors in securities transactions by administering securities legislation.

**SEC RULE 15C3-1:** See Uniform Net Capital Rule.

**STRUCTURED NOTES:** Notes issued by Government Sponsored Enterprises (FHLB, FNMA, SLMA, etc.) and Corporations, which have imbedded options (e.g. call features, step-up coupons, floating rate coupons, and derivative-based returns) into their debt structure. Their market performance is impacted by the fluctuation of interest rates, the volatility of the imbedded options and shifts in the shape of the yield curve.

**TREASURY BILLS:** A non-interest bearing discount security issued by the U.S. Treasury to finance the national debt. Most bills are issued to mature in three months, six months or one year.

**TREASURY BOND:** Long-term U.S. Treasury securities having initial maturities of more than ten years.

**TREASURY NOTES:** Intermediate U.S. government debt securities with maturities of one to ten years.

**YIELD:** The rate of annual income return on an investment, expressed as a percentage.