



**UNIVERSITY OF GUAM
UNIBETSEDÁT GUÅHAN
Board of Regents**

Resolution No. 22-10

**RELATIVE TO APPROVING THE REVISIONS TO THE UNIVERSITY OF GUAM
INVESTMENT POLICY STATEMENT**

WHEREAS, the University of Guam (UOG) is the primary U.S. Land Grant institution accredited by the Western Association of Schools and Colleges Senior College and University Commission serving the post-secondary needs of the people of Guam and the Western Pacific region;

WHEREAS, the governance and well-being of UOG is vested in the Board of Regents (BOR);

WHEREAS, UOG adopted an Investment Policy Statement (IPS) in February, 1989 governing the role of the Investment Committee in managing UOG's investments, especially the Land Grant Endowment Fund;

WHEREAS, since that time there have been several amendments to the policy;

WHEREAS, UOG's Investment Advisor, Raymond James & Associates, has recommended the IPS be updated with current information; and

WHEREAS, the Administration and the Investment Committee recommend the revised UOG IPS to the BOR for approval.


NOW, THEREFORE BE IT RESOLVED, that the BOR hereby approves the revised UOG IPS to be effective immediately.

Adopted this 24th day of February, 2022



Liza A. Provido, Chairperson

ATTESTED:



Thomas W. Krise, Ph.D., Executive Secretary

THE UNIVERSITY OF GUAM UNIBETSEDÅT GUAHAN

Investment Policy Statement



Adopted: February 1989

Amended: 1990, 1991, 1992, 1995, 1997, 2003, 2008, 2011, 2014, 2016, 2017, 2020, 2021 & 2022

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EXECUTIVE SUMMARY

Name of Fund: University of Guam Investment Fund

Current Market Value: \$31.1 Million (as of December 2021)

Planning Time Horizon: Greater than 20 years

Expected Return: Nominal rate of 6.24%

Asset Allocation:

	<u>Lower Limit</u>	<u>Strategic Allocation</u>	<u>Upper Limit</u>
US Equities	20%	30%	40%
<i>Large Cap Growth</i>		10%	
<i>Large Cap Value</i>		10%	
<i>Mid Cap Value</i>		2.5%	
<i>Mid Cap Growth</i>		2.5%	
<i>Small Cap Value</i>		2.5%	
<i>Small Cap Growth</i>		2.5%	
Non-U.S. Equities	10%	20%	30%
<i>Developed Markets Value</i>		10%	
<i>Developed Markets Growth</i>		10%	
Fixed Income	20%	30%	40%
<i>U.S. Core/ Intermediate</i>		20%	
<i>U.S. High Yield</i>		5%	
<i>Non-U.S.</i>		5%	
Alternatives	10%	20%	30%
<i>U.S. REITS</i>		5%	
<i>Low Duration Fixed Income</i>		5%	
<i>Global Listed Infrastructure</i>		5%	
<i>Private Markets</i>		5%	

I. STATEMENT OF PURPOSE

The purpose of this Investment Policy Statement (“IPS”) is to assist the Board of Regents (“Regents”) of the University of Guam, and its Investment Committee (“Committee”), in effectively supervising, monitoring and evaluating the investment of the University of Guam Internal Endowment Fund (“Fund”) assets. The Fund’s investment program is defined in the various sections of the IPS by:

- Stating in a written document the Regents’ attitudes, expectations, objectives, and guidelines in the investment of all Fund assets
- Setting forth an investment structure for managing all Fund assets. This structure includes various asset classes, investment management styles, asset allocation, and acceptable ranges that, in total, are expected to produce a sufficient level of overall diversification and total investment return over the long-term.
- Providing guidelines for each investment portfolio that controls the level of overall risk and liquidity assumed in that portfolio so that all Fund assets are managed in accordance with stated objectives
- Encouraging effective communications between the Regents, the Committee, the registered investment advisor (“RIA”), and the investment managers (“Investment Managers”)
- Establishing formalized criteria to monitor, evaluate and compare the performance results achieved by the Investment Managers on a regular basis
- Complying with all fiduciary, prudence and due diligence requirements that experienced investment professionals would utilize.

This IPS has been arrived at upon consideration by the Regents of the financial implications of a wide range of policies, and describes the prudent investment process that the Regents deem appropriate.

II. BACKGROUND

The Fund consists of a number of sub-funds, with the largest being the UOG Land Grant Endowment Fund. The University of Guam Land Grant Endowment Fund was established by a payment from the United States Federal Government with the sum of \$3 million (i.e., the corpus). This payment was given in lieu of a donation of public land or land scrip for the endowment and maintenance of colleges for the benefit of agriculture & mechanical arts normally provided in similar situations. The Fund sub-funds that will be managed by the Vice President of Administration and Finance (VPAF). The sub-funds will be updated quarterly. An accounting of the sub-funds can be found in Appendix D of this document.

Key Information

Name: University of Guam Investment Fund

Sponsor: University of Guam

Oversight: The President has delegated administrative responsibility for the University's investments to the VPAF. The Investment Committee, Board of Regents, University of Guam, has oversight. The voting members of the Investment Committee are the Board of Regents' Chair and three additional Regent members, one of which will be elected Chair of the Committee. Ex Officio members of the Investment Committee include the University President, VPAF, Comptroller, and ABAPO.

III. STATEMENT OF OBJECTIVES

The objectives of the Fund have been established in conjunction with a comprehensive review of the current and projected financial requirements. The objectives are:

- To attain a 6.24% annual rate of return or a rate of return at least four percent over the rate of inflation over a market cycle, whichever is greater. It is expected that this objective will be met within the levels of economic risk that a prudent man would take under various economic conditions. This objective may be modified periodically in light of changing rates of inflation.
- It is acknowledged that the rate of return outlined above may not be achieved each and every year. It is the goal of the Fund to meet this objective over a complete market cycle.
- To control costs of administering the Fund and managing the investments.

IV. SPENDING POLICY

University of Guam has the following funds available for investment:

A. Land-Grant Endowment Fund (\$3,000,000 corpus)

Public Law 19-40 established this Fund, requiring that the value of the original \$3 million corpus remain unimpaired and preserved. This is a permanent endowment. Given this, the Regents direct that the value of the corpus be adjusted annually for inflation using the U.S. Consumer Price Index-Urban ("Inflation-Adjusted Value") as follows (the Committee is directed to make this calculation at the beginning of each fiscal year):

$$\text{Corpus} \times \frac{\text{Current CPI-U (i.e., Consumer Price Index-Urban)}}{1974 \text{ CPI-U}}$$

In Board of Regents Resolution No. 21-12, rules for withdrawing funds from the Board governed funds are set forth as well as the potential authorized uses of the funds.

The Board and the Guam Legislature must approve the expenditure budgets from this Fund. Spending of funds cannot be for any building-related expenditure.

B. Planetarium Fund

Based upon Public Law 20-221 the University established a revolving fund for the Planetarium instrument. The University is authorized to spend from this Fund for the purposes of maintenance and parts for the Planetarium instrument. With the closure of the Planetarium, UOG counsel advised that remaining funds may be spent for science related purposes. The Board must approve the expenditure budgets from this Fund.

C. Current Account

The Current Account is an auxiliary account to the UOG General Fund. Unrestricted advances of monies from Internal Endowment accounts will be credited to the scholarship and other account and will be debited to this account. As the Current Account is utilized to reimburse monies drawn to pay the advances. The Account allows the University to avoid making frequent withdrawals to the Internal Endowment Fund

and selling in a disadvantageous market. The University is authorized to transfer periodically to reimburse the General Fund subject to the rules laid out in Resolution No. 21-12.

D. Faculty and Staff Development Fund

Per Board of Regents Resolution 93-17, the University is authorized to spend \$30,000 per year for faculty development and \$13,000 per year for staff development. Any amount over that shall be reinvested.

E. Campus Maintenance Fund (\$952,984 corpus)

It is the policy of the Regents and Committee to spend up to 4% of the moving average of the market value of the Fund for the trailing three years, ending each September 30 for the purposes of renovation and maintenance projects and replacement of major components for all campus buildings to sustain the highest levels of student learning and academic quality. The Board must approve the expenditure budgets from this Fund. To the extent that the total of this annual calculation is not withdrawn and expended, such excess shall be added to the corpus of the Fund.

As unanticipated additional funding requirements for the Fund may arise suddenly, the Fund will be invested in such a way that adequate funds can be made available within a short period of time should the need arise.

F. Dorm Renewal and Replacement Fund (\$150,000 corpus)

The Fund and spending authority were originally established to comply with the covenants of the Dorm Student Union Bond. As the bond is now fully paid, the bond covenants are no longer in force. From FY2009 forward, the University is authorized to spend from this Fund for the purposes of renovation and maintenance projects and replacement of major components for all dorms. The Board must approve the expenditure budgets from this Fund.

G. Self-Insurance Fund

Per Board Resolution 96-29, the University is authorized to spend from this fund for damages and loss prevention measures, as approved by the Investment Committee.

H. Scholarship Funds (Siu Lin Tan, Maman Ling-R. Taitano, Macs Corporation, DeLeon, Chinn Ho, J. Guthertz, Gov. Bill Daniel)

The University is authorized to spend from these funds for the specific purposes and in the manner established in each gift. The Chinn Ho Fund and the Governor Bill Daniel Fund have been set aside for the planned Last Mile program.

V. BROKERAGE POLICY

It is the policy of the Regents to instruct the Investment Managers to direct transactions to designated broker-dealers. The direction of trading shall be “subject to the best price execution” as it relates to all transactions effected for the Fund.

The Regents have entered into an asset-based fee arrangement, where it may instruct the Investment Managers to direct securities transactions to designated broker/dealers.

For transactions under this arrangement, executions will be done by designated broker/dealers without commission expense, or other forms of compensation that may have been paid for asset placement. The Investment Managers, exercising full discretion, must attempt to obtain “best available price and best execution” with respect to transactions effected for the Fund.

VI. SUSTAINABLE, RESPONSIBLE & IMPACT INVESTING POLICY

University of Guam is a recognized leader in the educational community. UOG has also been recognized for its financial stability and good governance, and has therefore amplified its international leadership and emphasized the importance of regional and global partnerships.

The University of Guam Board believes that as fiduciaries with oversight over valuable assets of the education of Guam’s future leaders, it is their duty to take a “Sustainable” investment approach to the management of the Fund. Sustainable investing integrates prudent Environmental, Social, and Governance (ESG) practices into the management of its financial assets. The challenge the Board faces is how to take ESG factors into account, but to still look at it through the lens of performance-based duty.

A growing body of research has demonstrated that poorly managed ESG risks, such as natural resource efficiency, human capital/labor management, and board independence can have a material impact on asset values. Therefore, the Board will adopt a policy of “integration” in addressing ESG factors. Under this approach, ESG issues are explicitly and systematically integrated into traditional investment analysis and decisions, to better manage risks and improve returns. Quite often this is implemented as a best-in-class approach by identifying and investing in companies that are the highest ESG performers within a sector or industry group. According to a recent CFA Institute study, Integration is the commonly used method of implementation of Sustainable investing.

Therefore, it is the policy of the Board to seek and retain Investment Managers that incorporate Sustainable investing criteria in their investment processes. To assist the Board in verifying that this is being done, all Investment Managers employed are preferred to be signatories of the United Nations Principles for Responsible Investment (“PRI”). The PRI is a global organization that encourages and supports the uptake of responsible investment practices in the investment industry.

VII. GUIDELINES AND INVESTMENT POLICY

Time Horizon

Investment guidelines are based upon an investment horizon of greater than twenty years, so that interim fluctuations should be viewed with appropriate perspective. Similarly, the Fund’s strategic asset allocation is based on this long-term perspective.

Risk Tolerances

The Regents recognize the difficulty of achieving the Fund’s investment objectives in light of the uncertainties and complexities of contemporary investment markets. The Regents also recognize that some risk must be assumed to achieve the Fund’s long-term investment objectives. However, it is the intent to monitor the risk being assumed by each individual Investment Manager and by the Fund as a whole. To that end, risk will be evaluated by:

- Over a market cycle, risk associated with any Investment Managers portfolio, as measured by the variability of quarterly returns (standard deviation) must not exceed that of the Investment Manager's respective performance benchmark, without a commensurate increase in return.
- Over a market cycle, risk associated with the total Fund, as measured by the variability of quarterly returns (standard deviation) must not exceed that of the blend of indices representing the strategic asset allocation of the Fund, without a commensurate increase in return.
- During market cycles the risk measures, as indicated herein, will be reviewed periodically by the Committee.

Performance Expectations

The investment objective is a long-term nominal rate of return on assets that is at least equal to 6.24%. This target rate of return for the Fund has been modeled by the RIA based upon the assumption that future real returns will approximate the long-run rates of return experienced for each asset class in the IPS.

The investment objective of the Fund is to strive for positive real rates of return (note: the U.S. Consumer Price Index - Urban (CPI) will be used when determining the real rate of return). It is acknowledged that the target rate of return may not be achievable each and every year. The Fund's objective is to meet the target rate of return over a complete market cycle.

The Committee realizes that market performance varies and that a 6.24% nominal rate of return may not be meaningful during some periods. Accordingly, relative performance benchmarks for the Investment Managers are set forth in Appendix B.

The Committee will consider risk-adjusted performance as well. Over market cycles, Investment Managers will be expected to provide returns with a positive Alpha, as measured against their respective benchmark index; as well as have a higher Sharpe Ratio than the index. The Fund as a whole will be measured in the same manner against an index composite in the same allocation as the Funds strategic allocation.

Asset Allocation Constraints

The Committee believes that the Fund's risk and liquidity posture are, in large part, a function of asset class mix. The Committee has reviewed the long-term performance characteristics of various asset classes, focusing on balancing the risks and rewards inherent in the marketplace.

Four asset classes have been selected:

1. U.S. Equities
2. Non-U.S. Equities
3. Fixed Income
4. Alternatives

Given the Fund's time horizon, risk tolerances, performance expectations & asset class preferences; an efficient (optimal) portfolio was identified (Appendix A).

Re-balancing of Strategic Allocation

The percentage allocation to each broad-asset class may vary as much as plus or minus 10% of target. The Fund's asset allocation will be reviewed for compliance by the Committee after the end of each fiscal quarter. If, after a fiscal quarter end where any particular broad asset class is either above its maximum limit, or below its minimum limit, and the Committee has not taken any corrective action within sixty (60) days, a member of the Board of Regents Executive Committee will be consulted by the University's Vice President for Administration and Finance in the event that no response was made by the Committee Chair. After such consultation, the Vice President for Administration and Finance may direct the RIA to take action to rebalance within policy compliance (after first sending notification of pending action to the Committee), and they are held harmless for doing so.

When necessary and/or available, cash inflows/outflows will be deployed in a manner consistent with the strategic asset allocation of the Fund. The allocation of the Fund will be reviewed by the Committee quarterly.

When cash flows are insufficient to bring the Fund within the strategic allocation ranges, the Committee shall determine the appropriate course of action to be taken. The Investment Managers will then be instructed to execute such action required to bring the strategic allocation within the pre-specified ranges.

Custodial Credit Risk

Custodial credit risk will be mitigated by requiring that: 1) All securities held in custody be protected by deposit insurance, bond, or pledged collateral; and 2) Securities held in custody be in the University's name or in the name of the University's custodian for the benefit of the University.

Ethics Guidelines

The Regents, Committee and University employees are subject to the standards found in the University's Procurement Regulations, Chapter 11, Ethics in Public Contracting, in the performance of their duties under the Investment Policy Statement.

The Regents, Committee, University employees and RIA must avoid conflicts of interest and should be sensitive to even the appearance of a conflict. A conflict of interest occurs when outside activities or personal interests interfere, or appear to interfere, with the ability to objectively perform a job or act in the best interests of the University.

All financial, business and other activities must be lawful and free of conflicts or even the appearance of a conflict with the responsibilities to the University. If there are potential conflicts of interest or even if there is a possibility that a conflict may exist or appear to exist, it should be disclosed to the Committee in writing. All fiduciaries will annually acknowledge the University's ethics policies and agree to disclose any potential conflicts of interest accordingly.

VIII. SECURITIES GUIDELINES

Every Investment Manager selected to manage Fund assets must adhere to the following guidelines.

General:

- Any pertinent restrictions existing under the laws of Guam with respect to the Fund, that may exist now or in the future, will be the governing restriction.
- U.S. and non-U.S.: equities; ADRs (American Depository Receipts); convertible bonds; preferred stocks; fixed-income securities; mutual funds; and other asset classes deemed prudent by the Regents, are permissible investments.
- No individual security of any issuer, other than that of the United States Government, shall constitute more than 5% (at cost) of the Total Fund or 10% (at cost) of any Investment Manager's portfolio.
- No investment may be made in the securities of a single corporate entity in excess of 15% (at market) of any individual Investment Manager's portfolio, without prior Committee approval.
- Holdings of any issuer shall constitute no more than 5% of the outstanding securities of such issuer.
- Investments in a registered mutual fund managed by any Investment Manager is subject to the prior approval of the Committee.
- The following securities and transactions are not authorized without prior written Committee approval: letter stock and other unregistered securities; non-negotiable securities; commodities or other commodity contracts; options; futures; short sales; and margin transactions.
- As some of following investments may be in equities or mutual funds, the RIA will determine the appropriate asset class for reporting purposes, updating the Committee whenever a change in reporting occurs.

Core Fixed Income:

- Except for high yield fixed income funds, all fixed income securities held in the Core Fixed Income portfolio shall have a Moody's, Standard & Poor's and/or a Fitch's credit quality rating of no less than broad investment grade "BBB" or it's equivalent. U.S. Treasury and U.S. Government agencies, which are unrated securities, are qualified for inclusion in the portfolio and will be considered to be of the highest rating.
- No more than 20% of the market value of the portfolio shall be rated less than single "A" quality, unless the Investment Manager has specific prior written authorization from the Committee.
- Total portfolio quality (cap weighted) shall maintain an "A" minimum rating.

High Yield Fixed Income

- Investments are authorized in High yield fixed income funds to include US and non-US-dollar-denominated securities carrying a below investment grade quality rating. High yield bonds carry a Moody's/Standard & Poor's credit quality rating of Ba1/BB+ or lower.

Equities:

- Consistent with the desire to maintain broad diversification, allocations to any economic or industry sector should not be excessive.
- Equity holdings shall be restricted to readily marketable securities of corporations that are actively traded on the major exchanges and over the counter.
- The Investment Managers shall have the discretion to invest a portion of the assets in cash reserves when they deem appropriate. However, the Investment Managers will be evaluated against their peers on the performance of the total funds under their direct management.
- Common stock and preferred stock of any institution or entity created or existing under the laws of the United States or any other country are permissible investments.

Cash/Cash Equivalents:

- Cash equivalent reserves shall consist of cash instruments having a quality rating of A-1, P-1 or their equivalent. U.S. Treasury and Agency securities, Bankers Acceptances, Certificates of Deposit (CD), and Collateralized Repurchase Agreements are also acceptable investment vehicles.
- Custodial Sweep Accounts must be, in the judgment of the Investment Managers, of credit quality equal or superior to the standards described above.
- CD's must be issued by FDIC insured institutions. Deposits in institutions with less than \$10,000,000 in assets may not be made in excess of prevailing FDIC insurance limits unless it is fully collateralized by U.S. Treasury Securities.
- No single issue shall have a maturity of greater than two (2) years.
- Custodial Sweep Account portfolios must have an average maturity of less than one (1) year.

Real Estate Investment Trusts (REITS):

- Investments in REITS are authorized that represent ownership interests in commercial real estate properties, including office buildings, apartment buildings, hotels, and shopping centers. They may also include publicly traded companies engaged in the ownership, development, and/or management of real estate.

Non-Traditional/Alternative Investments:

- Definition: Non-Traditional/Alternative Investments are often structured as private investments and are generally formed as limited partnerships or limited liability companies and, in many cases, organized in low or no tax jurisdictions. The managers of these investments generally are allowed to operate with greater flexibility than most traditional investment managers and their compensation usually includes substantial performance incentives.
- Objective: Investment in alternatives may be considered by this organization within the context of an overall investment plan. The objective of such investments will be to seek to diversify the portfolio, complementing traditional equity and fixed-income investments and improving the overall performance consistency of the portfolio. It is acknowledged that there is no guarantee that this objective will be realized.

- **Transparency and Liquidity:** It is acknowledged that these investments are less transparent than traditional investments and that liquidity in such investments is usually significantly limited. Liquidity constraints, including lockup provisions and redemption or withdrawal fees, must be taken into consideration when making allocations to such investments.
- **Allowable Strategies:** Since alternative investments generally seek to provide diversification by investing in strategies that do not correlate directly with traditional equity and/or fixed-income investments, investments strategies may include, but are not limited to, the following:
 - Statistical Arbitrage
 - Distress Securities
 - Bayesian Modeling
 - Merger Arbitrage
 - Momentum Trading
 - Fixed Income Arbitrage
 - Debt/Equity Financing
 - Equity Long/Short
 - Leveraged Buyouts
 - Global macro
 - Venture Capital
 - Short Selling
 - Mezzanine Debt
 - Commodities and Futures
 - Equity Market Neutral
 - Structured Credit Products
 - Convertible Arbitrage
 - Infrastructure
 - Real Estate (Public & Private)

The foregoing allowable strategies may be pursued in any manner including through collective investment vehicles such as hedge funds, funds of hedge funds, private equity (i.e. LBO, Venture, Mezzanine Debt, etc.) funds and funds of funds, real estate funds and funds of funds, commodity pools, and structured credit products such as equity CDOs.

- **Allowable Investments:** The above referenced strategies may include, but are not limited to, investments (directly or indirectly) in the following: common and preferred stocks, options, warrants, convertible securities, foreign securities, foreign currencies, commodities, commodity futures, financial futures, derivatives, mortgage-backed and mortgage-related securities, real estate, bonds (both investment-grade and non-investment-grade, including high-yield debt, distressed or other securities) and other assets. Strategies may utilize short-selling and leverage.
- **Risk Acknowledgement:** The Regents and the Committee acknowledge that: (1) alternative investments can be highly illiquid and may engage in leveraging and other speculative investment practices, which may involve volatility of returns and significant risk of loss, including the potential for loss of the principal invested; (2) that there is no secondary market currently available for interests in most alternative investments and that there may be restrictions imposed by the fund on transferring such interests as stated in the fund's private placement memorandum or prospectus; (3) that investing in alternative investments is only suitable for experienced and sophisticated investors who are willing to bear the high economic

risks of the investment and that this organization qualifies as such an investor; (4) that it will carefully review and consider all potential risks before investing including the following specific risks:

- loss of all or a substantial portion of the investment due to leveraging, short-selling, or other speculative practices;
- lack of liquidity as there may be no secondary market for the investments;
- volatility of returns;
- restrictions on transferring interests in the investments;
- potential lack of diversification and resulting higher risk due to concentration of trading authority when a single advisor is utilized;
- absence of information regarding valuations and pricing;
- less regulation and higher fees than mutual funds, and
- Investment advisor risk

IX. SELECTION OF INVESTMENT MANAGERS

The Committee, with the assistance of the RIA, will select appropriate investment managers to manage Fund assets. Investment Managers selected will execute written contracts with the University or the RIA, particularly where the RIA has a master contract with Investment Managers, whereby they can be retained by the University at preferential fees and at substantially reduced minimums. The University may subcontract with them through its contract with the RIA. Investment Managers must meet the following minimum criteria:

- Be a bank, insurance company, investment management company, or investment adviser as defined by the Investment Advisers Act of 1940.
- Must claim compliance to GIPS® standards and provide independent verification by a qualified third-party verifier.
- Provide historical quarterly performance numbers calculated on a time-weighted basis, based on a composite of all fully discretionary accounts of similar investment.
- Provide detailed information on the history of the firm, key personnel, key clients, fee schedule, and support personnel.
- Clearly articulate the investment strategy that will be followed and document that the strategy has been successfully adhered to over time.
- Must have been continuously engaged as an investment manager for five years.
- Must have at least two hundred million dollars under management.
- Assets that are to be placed in an investment management organization shall not exceed 20% of the organization's total asset under management.
- Selected firms shall have no outstanding legal judgments or past judgments, which may reflect negatively upon the firm.
- Preferred if manager is a PRI Signatory.

The University's relationship with the Investments Mangers will be subject to ongoing periodic review, benchmarked against the criteria set forth in the IPS. The term of the relationships will be at the discretion of the Committee, as they deem necessary. It is noted that having fixed or arbitrary time frames may lead to Investment Manager behavior that is not necessarily driven by the best interests of the University.

X. SELECTION OF REGISTERED INVESTMENT ADVISOR

The Committee will select an appropriate, registered investment management consulting firm as a Registered Investment Advisor ("RIA") to assist in the prudent investment and monitoring of the Fund. The RIA selected will execute a written contract with the University. The RIA must meet the following minimum criteria:

- The RIA must be a Registered Investment Advisor (RIA) registered with the Securities Exchange Commission.
- Consultants must be recognized as expert in Investment Management Consulting, with an emphasis in institutional/endowment funds and must be able to provide unbiased fiduciary and financial advice.
- Consultants must demonstrate experience in the breadth and depth of their professional staff. The specific individual providing advice to the Fund must provide evidence of specialized training in the field of Investment Management Consulting, such as the Certified Investment Management Analyst (CIMA) designation, or its equivalent.
- The specific individual providing advice to the Fund shall not have any awards or judgments against him or her either by the Securities Exchange Commission (SEC) or Financial Industry Regulatory Authority (FINRA).
- RIA must maintain its own independent investment manager database and have its own investment manager due diligence capabilities, as well as its own investment performance monitoring system to ensure quality and accuracy of data and which tasks should not have to be either subcontracted out or purchased from third party vendors.

The University's relationship with the RIA will be subject to ongoing and annual review, benchmarked against the criteria set forth in the IPS. The term of the relationship will be at the discretion of the Committee, as they deem necessary. It is noted that having fixed or arbitrary time frames may lead to RIA behavior that is not necessarily driven by the best interests of the University.

XI. SELECTION OF SECURITIES CUSTODIAN

The Committee with RIA advice will select an appropriate securities custodian ("Custodian") to safe keep Fund assets and to provide timely reporting of assets and activity. The Custodian must meet the following minimum criteria:

- Must be a U.S financial institution regulated by the Federal Reserve, a state banking authority, the Comptroller of the Currency or the appropriate equivalent, depending upon the nature of the given institution.
- Must have a minimum net worth in excess of \$1 billion.
- Must have direct access to the Depository Trust Company I.D. System.

- Must have at least 10 years experience as a custodian of similar funds.
- Must have at least \$1 billion in custodial assets.
- Must offer electronic access to account information, to include statements.

XII. CONTROL PROCEDURES

Duties and Responsibilities of the Investment Managers

The duties and responsibilities of each Investment Manager retained include:

- Exercising investment discretion over the Fund assets under its care and control in accordance with the IPS objectives and guidelines set forth herein.
- Promptly informing the Committee in writing, all significant or material matters pertaining to the investment of Fund assets, including, but not limited to: investment strategy; portfolio structure; tactical approaches; ownership; organizational structure; financial condition; professional staff; and, any material, legal or regulatory agency proceedings affecting the firm.
- Promptly voting all proxies and related actions in a manner consistent with the long-term interests and objectives of the Fund set forth herein.
- Utilize the same care, skill, prudence and due diligence under the circumstances then prevailing that experienced, investment professionals acting in a like capacity and fully familiar with such matters would use in like activities for like funds with like aims in accordance and compliance with all applicable laws, rules and regulations from local, state and federal entities as it pertains to fiduciary duties and responsibilities.
- Acknowledge, and agree in writing to, their fiduciary responsibility.
- If a PRI Signatory, provide a current year PRI Transparency Report upon request.

Duties and Responsibilities of the Registered Investment Advisor

The duties and responsibilities of the RIA retained by the Committee include, but are not limited to, the following:

- Assist in with the development of investment strategies for Fund's assets
- Analyze existing investments
- Assist with asset allocation
- Select relevant performance benchmarks for each investment management style, updating Appendix B as needed in consultation with the Committee
- Assist in the IPS development/ongoing review
- Recommend replacement of Investment Managers when warranted by qualitative or quantitative factors set forth herein
- Provide investment manager search services
- Monitor the performance of Fund assets and Investment Managers to include reporting against relevant performance benchmarks

- Report on Investment Managers' adherence to the IPS guidelines
- Provide educational forms, as requested
- Provide quarterly on-site reviews
- Assist with special projects.

Duties and Responsibilities of the Securities Custodian

The duties and responsibilities of the Custodian include, but are not limited to, the following:

- Keep safe assets entrusted to the care of the Custodian;
- Collect, and credit, on a timely basis, all income due to the Fund;
- Provide on a timely basis, monthly accounting statements for all Fund accounts;
- Provide web access to all account information, including activity and statements.

Performance Objectives

Investment performance will be reviewed at least quarterly to determine the continued feasibility of achieving the investment objectives and the appropriateness of the IPS for achieving those objectives. It is not expected that the IPS will change frequently. In particular, short-term changes in the financial markets should not require adjustments to the IPS.

Monitoring of the Registered Investment Advisor

On a timely basis, but not less than once a year at the end of each fiscal year, the Committee will meet concerning:

- RIA's adherence to the IPS guidelines and applicable laws
- Consultants continuing qualifications per IPS requirements
- Material changes in the RIA's organization and/or personnel
- Timeliness, completeness and accuracy of reporting
- Review of RIA relative to advice given in regards to investment strategy development, asset allocation & Investment Manager selection/replacement.
- Quality of educational programs, quarterly reviews and special projects
- Fees paid.

Monitoring of Investment Managers

On a timely basis, but not less than four times a year, the Committee will meet concerning:

- Investment Manager's adherence to the IPS guidelines and applicable laws
- Material changes in the Investment Managers' organization, investment philosophy and/or personnel
- Review of Investment Manager performance relative to the established performance benchmarks

- Fees paid.

The appropriate performance benchmarks are detailed under each Investment Manager's specific objectives and guidelines as presented in Appendix B.

Performance Measurement Periods

The measurement period for complete evaluation will be cumulative annual periods and complete market cycles. Market cycles will be loosely defined as periods of at least two consecutive quarters of rising stock prices/interest rates or two consecutive quarters of declining stock prices/interest rates.

Quarterly performance will be evaluated to test progress toward the attainment of longer-term targets. It is understood that there are likely to be short-term periods during which performance deviates from market indices. During such times, greater emphasis shall be placed on *peer*-performance comparisons with investment managers employing similar styles.

The Committee will utilize the services of the RIA to assist in their evaluation and complete performance measurement duties.

The performance of the Fund's Investment Managers will be monitored on an ongoing basis and it is at the Committee's discretion to take corrective action by placing an Investment Manager on a "Watch List", or terminating an Investment Manager, if they deem it appropriate at any time.

Watch List

The Consultant shall maintain a Watch List, which provides a means to communicate developments of potential concern. Placement on the Watch List initiates a probationary period that allows time to better assess the effects — negative or positive — stemming from the development in question. Upon placement on the Watch List, the Committee may notify the Investment Manager in writing and may require a countersignature upon receipt upon inception of Watch List notification.

The Committee, with the assistance of the Consultant, will attempt to resolve Watch List assignments as soon as possible. These attempts are balanced with a goal of making more informed judgments that are consistent with maintaining a long-term investment perspective.

More common reasons for Watch List assignments include:

- Major ownership changes
- Significant firm and/or product asset declines
- Excessive asset growth in products with limited capacity
- Concerns regarding changes to key service providers
- Professional turnover
- Notably altered incentive structures for key professionals
- Questionable changes in investment decision-making authority
- Material changes in investment approach

- Extended period of unexplainable or unanticipated relative underperformance

If the Investment Manager improves and satisfies the concerns over a reasonable time period (often 6 months to 18 months) the Investment Manager is upgraded off of the Watch List. For example, if Watch is caused by two to three years of underperformance, combined by excessive analyst turnover, performance improvement and personnel stability can cause the upgrade, and vice versa. If concerns are not satisfied, the Committee will terminate the Investment Manager, or if not, provide in Board Minutes, the rationale for not terminating the Investment Manager.

Termination

The Committee may replace an Investment Manager at any time for any reason the Board deems appropriate and in the long-term best interest of the fund, including, but not limited to:

- Failure to meet investment goals delineated herein.
- Deviations from permitted investments listed herein.
- Failure to adhere to stated investment philosophy and style.
- Violating applicable laws and regulations. Special emphasis will be placed upon adherence to "best price and execution" guidelines as well as adherence to the "Prudent Expert Rule".
- For any other reason the Committee deems appropriate and in the long-term best interest of the Fund.

It is the Committee's policy that if the need arises to replace an investment manager, a notice will be placed in appropriate publications soliciting proposals from qualified investment managers. The Board, in conjunction with its investment consultant, will develop the credentials and qualifications desired to be able to evaluate the responding managers.

Safe Harbor

As the University's investment decisions are committee-directed, five generally recognized "safe harbor" requirements will be followed:

- Investment decisions must be delegated to a "prudent expert(s)" (registered investment adviser [including mutual funds], bank or insurance company).
- The Committee must demonstrate that the prudent expert(s) was selected by following a due diligence process.
- The prudent expert(s) must be given discretion over the assets.
- The prudent expert(s) must acknowledge their co-fiduciary status in writing (mutual funds are exempted from this requirement – the prospectus is deemed to serve as the fund's fiduciary acknowledgement).
- The Investment Committee must monitor the activities of the prudent expert(s) to ensure that the expert(s) is properly performing the agreed upon tasks using the agreed upon criteria.

Monitoring of Fiduciary Responsibilities and Prudent Practices

On a timely basis, but not less than once a year, the Committee will meet to address:

- Appropriate policies and procedures are in place to address all fiduciary obligations;
- Policies and procedures are effectively implemented and maintained
- The IPS is up-to-date.

The Committee will utilize the services of an AIF® certified consultant to assist in their evaluation. This role will fall to the Vice President for Administration and Finance when so qualified. The consultant shall not be an employee of a financial services provider to the University.

University of Guam Investment Policy Statement - Appendix A

Asset Allocation Review and Optimization Analysis

Based on formal asset allocation studies conducted in 1994, 1997, 2003, 2008, 2011, 2014, 2016, 2019, 2020 & 2021 the Regents and Committee, with the assistance from the Fund’s RIA, identified an optimal broad asset class mix based on the Fund’s time horizon, risk tolerances, performance expectations, and asset class preferences. The optimizer will be provided upon request.

The Committee further augmented the diversification of the Fund by implementing the strategic asset allocation with complementary styles of asset management. The Committee has reviewed the characteristics of various styles of investment management, focusing on balancing the risks and rewards of style behavior. The Committee specifically noted how investment styles go in and out of favor and the Committee understands the prudence of diversifying among several styles of investment management.

The following strategic asset allocation for the Fund was selected:

	<u>Lower Limit</u>	<u>Strategic Allocation</u>	<u>Upper Limit</u>
US Equities	20%	30%	40%
<i>Large Cap Growth</i>		10%	
<i>Large Cap Value</i>		10%	
<i>Mid Cap Value</i>		2.5%	
<i>Mid Cap Growth</i>		2.5%	
<i>Small Cap Value</i>		2.5%	
<i>Small Cap Growth</i>		2.5%	
Non-U.S. Equities	10%	20%	30%
<i>Developed Markets Value</i>		10%	
<i>Developed Markets Growth</i>		10%	
Fixed Income	20%	30%	40%
<i>U.S. Core/ Intermediate</i>		20%	
<i>U.S. High Yield</i>		5%	
<i>Non-U.S.</i>		5%	
Alternatives	10%	20%	30%
<i>U.S. REITS</i>		5%	
<i>Low Duration Fixed Income</i>		5%	
<i>Global Listed Infrastructure</i>		5%	
<i>Private Markets</i>		5%	

University of Guam Investment Policy Statement - Appendix B

Investment Manager Performance Objectives

(Note: RIA updates Performance Benchmarks, when needed in consultation with Committee)

Management Style:	U.S. Large Cap Growth Equity
Performance Benchmark:	Russell 1000 Growth Index
Management Style:	U.S. Large Cap Value Equity
Performance Benchmark:	Russell 1000 Value Index
Management Style:	U.S. Mid Cap Growth Equity
Performance Benchmark:	CRSP U.S. Mid Cap Growth Index
Management Style:	U.S. Mid Cap Value Equity
Performance Benchmark:	CRSP U.S. Mid Cap Value Index
Management Style:	U.S. Small Cap Growth Equity
Performance Benchmark:	Russell 2000 Growth Index
Management Style:	U.S. Small Cap Value Equity
Performance Benchmark:	Russell 2000 Value Index
Management Style:	Non-U.S. Developed Markets Equity
Performance Benchmark:	MSCI EAFE Index
Management Style:	U.S. Core Fixed Income
Performance Benchmark:	BC U.S. Aggregate Bond Index
Management Style:	U.S. High Yield Fixed Income
Performance Benchmark:	ICE BofAML BB-B US High Yield Cash Pay Index
Management Style:	Non-U.S. Fixed Income
Performance Benchmark:	FTSE World Government Bond ex US Index
Management Style:	Real Estate Investment Trusts
Performance Benchmark:	Wilshire U.S. REIT Index
Management Style:	Low Duration Fixed Income
Performance Benchmark:	ICE BofA ML 1-5 Year US Treasury & Agency Index
Management Style:	Global Infrastructure
Performance Benchmark:	MSCI World Infrastructure USD Net Index
Management Style:	Private Markets
Performance Benchmark:	HFRI FOF Index

University of Guam Investment Policy Statement - Appendix C

Acknowledgement of the Investment Policy Statement

Receipt of the University of Guam Investment Policy Statement is acknowledged:

Signature

Printed Name

Title

Date

Signature

Printed Name

Title

Date

Signature

Printed Name

Title

Date

University of Guam Investment Policy Statement - Appendix D

Accounting of Sub-Funds

The UOG Main Endowment fund consists of the following sub-funds as of September 30, 2019. All percentages will be updated quarterly under the supervision of the office of the Vice President of Administration and Finance.

<u>Sub Fund</u>	<u>Approximate Percent</u>
True Endowment	
Land Grand Endowment	56.4%
Planetarium	1.3%
Current Account	
SBPA	5.1%
UOG Common	10.7%
Quasi Endowment	
Faculty/ Staff Development	10.6%
Campus Maintenance	5.7%
Dorm Renewal/ Replacement	3.5%
Self-Insurance	<1%
Scholarship Trust	
Siu Lin Tan	3%
Maman Ling/ Taitano Nursing	<1%
Deleon	<1%
Chin Ho	<1%
Gov. Bill Daniel	<1%
J. Guthertz	<1%