STATE OF IDAHO
OFFICE OF THE STATE TREASURER
RON G. CRANE STATE TREASURER

Diversified Bond Fund Investment Policy

SCOPE

The Diversified Bond Fund ("DBF") has been created by the Idaho State Treasurer's Office ("STO") as an alternative investment to the short term investment funds such as the Local Government Investment Pool ("LGIP") and IDLE, for those State Agencies and Public Agencies and Municipalities ("Participants") who are able to assume less liquidity and more price volatility for the potential of greater returns over a longer time horizon. The portfolio will be expected to provide a return above that of the Index over a typical market cycle (5 to 7 years).

The following investment guidelines have been established by the STO to provide guidance and direction for the investment of the principal and income held and managed for various funds under the State Treasurer's DBF.

INVESTMENT OBJECTIVES

The investment objective of the DBF is to provide a total return consistent with a high quality intermediate-term diversified fixed income portfolio. Investment management emphasis is placed on total return. Based upon historical market performance, it is anticipated that returns over extended periods will be greater in the DBF than in shorter maturity alternatives such as the LGIP or IDLE portfolios.

STATUTORY AUTHORITY

According to Section 67-1210, Idaho Code, the State Treasurer is a custodian of the public confidence and is ultimately responsible for conducting investment transactions.

STANDARDS OF CARE

The standard to be used by investment personnel will be the 'Prudent Investor' rule, Section 67-1210 & 67-1210A, and any applicable Idaho Code. This concept will be applied in the context of managing the overall portfolio where the 'prudent investor' is reasonable, well informed and not a professional investor "prudent expert." The "prudent investor" concept implies that we must act as a prudent person would be expected to act, with discretion and intelligence, to preserve capital, seek reasonable income, and in general avoid speculative investments.

ETHICS

Officers and employees involved in the investment process shall refrain from engaging in personal business activities affected by their duties and responsibilities as investors of public funds, that could conflict with the proper execution and management of the investment program, or that could impair their ability to make impartial decisions. Employees and investment officials shall disclose any material interests in financial institutions with which they conduct business. They shall further disclose any personal financial/investment positions that could be related to the performance of the investment portfolio. Employees and officers shall refrain from undertaking personal investment transactions with the same individual with whom business is conducted on behalf of the entity.

INTERNAL CONTROL

The State Treasurer is responsible for establishing and maintaining an internal control structure designed to ensure that the assets of the State are protected from loss, theft, or misuse. The internal control structure shall be designed to provide reasonable assurance that these objectives are met. The concept of reasonable assurance recognizes that (1) the cost of control should not exceed the benefits likely to be derived and (2) the valuation of costs and benefits require estimates and judgments by management.
Accordingly, the State Treasurer shall establish a process for an annual independent review by an auditor to assure compliance with policies and procedures. The internal controls shall address the following points:

- Control of collusion,
- Segregation of duties,
- Clear delegation of authority to subordinate staff members,
- Procedures to consummate a purchase or sale of a security,

Written confirmation of investment and wire transfer transactions.

A. Legal Investments

The following list is comprised of current legal investments under Section 67-1210, and Section 67-1210A, Idaho Code. Under section 67-2739 of the Idaho Code unsecured investments are permitted. The State will diversify its investments in order to avoid risks in specific instruments, individual financial institutions or maturities.

B. Diversification

The current diversification based on total portfolio par value at the time of purchase is as follows:

INVESTMENT INSTRUMENT	MAXIMUM ALLOWED
Treasuries*	100%
Money Market Funds**	100%
Corporate Bonds**	25%
U.S. Government Sponsored Enterprises (“GSE”)*	100%
Federal Agricultural Mortgage Corporation (FAMC)	50%
Federal Farm Credit Bank (FFCB)	50%
Federal Home Loan Bank (FHLB)	50%
Federal Home Loan Mortgage Corporation (FHLMC)	50%
Federal National Mortgage Association (FNMA)	50%

Private Export Funding Corporation (PEFCO)	50%
Tennessee Valley Authority (TVA)	50%
Repurchase Agreements**	100%
Mortgage Backed Securities**	35%
Agency Commercial Mortgage Backed Securities**	5%
Asset Backed Securities**	20%
Commercial Paper	25%
* No interest or principal only securities (excluding treasury bills, discount notes, and commercial paper)	
**See Special Considerations section	

C. Maturity Schedule

Investments will not exceed a maximum maturity of 10 years on approved investments, with the exception of mortgage backed securities, asset backed securities and commercial mortgage backed securities which have up to a maximum maturity of 30 years.

D. Performance Evaluation

The investment portfolio will be managed in accordance with the parameters specified within this policy and should obtain a market average rate of return during a market/economic environment of stable interest rates. The benchmark for the portfolio is a blended Index consisting of 75% the Bank of America Merrill Lynch U.S. Corporate & Government 1-10 years A rated and above (B510 Index) and 25% the Bank of America Merrill Lynch Mortgage Master (M0A0 Index).The performance will be measured on a total return basis, quarterly at a minimum.

1. The "A" represents ratings considered upper-medium grade in credit quality by one nationally recognized rating agency to comply with Idaho Code Section 67-1210a.

E. Reporting

The Treasurer's Office shall prepare and/or work with an outside Advisor/Consultant to prepare an investment report quarterly at a minimum and post on the Treasurer's website. It will include performance, credit quality distribution, maturity distribution, ratings distribution, sector distribution, portfolio metrics and a compliance check to policy.

F. Realized Gains and Losses Policy

The Treasurer's Office shall follow the separate realized gains and losses policy in Appendix A.

SPECIAL CONSIDERATIONS ON CERTAIN INVESTMENTS

A. Corporate Bonds/Notes

1. Securities must be rated A3, A-, or A-", or better by two or more Nationally Recognized Statistical Rating Organizations ("NRSRO") (i.e. Moody's Investor Services or Standard and Poor's Inc.) at the time of purchase.

2. Diversification: To reduce overall portfolio risks.
   a. Limiting investments to avoid over-concentration in securities from a specific sector.
   b. Each issuer may not exceed 1.5% of the respective investment portfolio at the time of purchase.

3. Floating rate securities:
   a. Must be tied to a current, liquid market index such as a CMT index, Libor, Treasury Bills, Fed Funds, etc.
   b. May not have a cap on the coupon.
   c. The maximum period of coupon adjustment will be quarterly.

4. The corporate entity must be organized, controlled, and operating within the United States.

B. Commercial Paper

Idaho code 67-1210A specifies that only investment grade commercial paper can be purchased. At the time of purchase, each commercial paper issuer may not exceed 5% of the respective investment portfolio (the 5% is in aggregate with an issuer's corporate bonds/notes). All commercial paper purchased must be registered and be rated P-1, A-1, or F1or its equivalent or better by two or more NRSROs at the time of purchase. There will be no exceptions to these rules.

C. Repurchase Agreements

The State Treasurer's current policy is to conduct repurchase agreement ("repo") transactions with dealers, brokers and local financial institutions. Per Idaho Code the State Treasurer is only allowed to enter into delivery versus payment repo. Before a bid on a repurchase agreement is considered, the "Master Repurchase Agreement" must be signed by the dealer, broker, bank, credit union, or savings and loan issuing the instrument as well as the State Treasurer. Allowable collateral for the seller's margin account will be securities of the United States Government and/or senior debt of a GSE with stated final maturities of 5 years or less. The seller's margin account will equal 102% of the repurchase price.

If the seller's margin amount decreases below the required haircut, additional securities will be obtained to meet the requirement.

Substitutions of securities used as collateral for repurchase agreements will be allowed only when agreed upon by the STO, provided the seller pays the buyer's cost associated with such a transaction at the time of the trade. The counterparty must inform the STO at least twenty-four (24) hours prior to the substitution. No exceptions will be permitted.

D. Mortgage Backed Securities

Mortgage backed securities and/or collateralized mortgage obligations ("CMO") comprised of loans sponsored by government agencies and/or quasi-government agencies (i.e. FNMA, FHLMC, GNMA etc.);

1. These investments are not to exceed 35% of total portfolio par value using current face and are not to exceed a combined maximum weighted average life of 6 years.
2. CMOs will be limited to planned amortization and/or targeted amortization class tranches

E. Commercial Mortgage Backed Securities

Commercial mortgage backed securities must be issued and guaranteed by FNMA and/or FHLMC.

1. These investments are not to exceed 5% of total portfolio par value using current face and are not to exceed a combined maximum average life of 5 years.

F. Asset Backed Securities

Asset backed securities ("ABS") must be rated AAA by a NRSRO at the time of purchase.

1. ABS investments are not to exceed 20% of total portfolio par value using current face and are not to exceed a combined maximum average life of 3 years.

G. Money Market Funds

Money market funds consisting of U.S. Government Agency and/or U.S. Treasury securities or repurchase agreements collateralized by U.S. Government Agency and/or U.S. Treasury securities whose reported principal valuations are not subject to market fluctuations will only be permitted.

Investment of Assets

Assets shall be invested and diversified as follows:

1. Assets in the account shall be sufficiently diversified by type and maturity to meet unanticipated withdrawals.
2. The total portfolio effective duration shall not be less than 0.50 times and no more than 1.25 times the Index effective duration.
3. No more than 5% of the portfolio shall be invested in the securities of one issuer. This restriction does not apply to U.S. Treasury, U.S. Govt. Related senior debt, or repurchase agreements.

a. Par value for investments in commercial paper and corporate debt for the same issuer are not to exceed 5% combined at the time of purchase.

COMPETITIVE SELECTION OF INVESTMENT INSTRUMENTS

For the purchase of securities, the Treasurer's Office shall determine the most prudent investment considering the investment's safety, liquidity, and yield. For example, the bid giving the highest yield after conducting an analysis will be accepted if the safety and liquidity are judged to be equal. This shall apply to the investment instrument as well as financial institution.

A competitive bid process will be required prior to the divesture of any security in the portfolio. The Treasurer's Office will strive to achieve the best execution given the investment type, characteristics, issuer, and market conditions.

SELECTION OF BANKS AND BROKERS/DEALERS

It is the policy of the State Treasurer's Office to perform due diligence on all brokers and dealers during a three month trial period before being placed on the approval list (See Appendix B). Criteria for selection will include registration as a dealer or broker with the Department of Finance. Criteria for selection of banks will include registration with the Department of Finance and designation of the bank as a public depository institution as regulated by Idaho Code, Section 67-2739. On the date of or before the holding of state deposits, the Banking Corporation or the National Banking Association must file an affidavit (a legal document of trust) with the State Treasurer. This affidavit must be from one of the officers of the banking institution. This affidavit is effective for a one year period. After expiration, to continue the holding of state deposits, a new affidavit must be completed. The Treasurer's Office will invest with those financial institutions that meet the above criteria.

SAFEKEEPING

All investments shall be held under current contract in safekeeping by Northern Trust, in the name of the Idaho State Treasurer's Office, or in the State Treasurer's vault.

BOOK OF RECORD

The State Treasurer's Office uses TATRS (internal proprietary software) as the book of record. All monthly distributions will be calculated from the figures provided by TATRS and reconciled against third party information. A monthly reconciliation will be performed between TATRS and the custodian to ensure that all securities are accounted for. Effective as of July 1st, 2011

APPROVAL OF INVESTMENT POLICY

The investment policy shall be approved annually by the State Treasurer.

EXCEPTIONS

Any exceptions to the Investment Policy will be submitted in writing for approval by the State Treasurer and/or Chief of Staff.

EVALUATION

The State Treasurer reserves the right to amend any of the previous internal guidelines.

Approved by: Ron G. Crane Date: 5/19/2016

Revised 5-19-16 and subject to further revision upon review by the Treasurer's Investment Advisory Board.

Appendix A

Realized Gains and Losses Policy

A. Non-Impaired Investments

Realized gains and losses will be accounted for during the month of recognition and will be included in the regular monthly interest distribution for non-impaired investment trades transacted due to the daily management of the DBF. Unrealized gains and losses will not be distributed until recognized.
The following will be followed for realized gains and losses on non-impaired investments:

1. Realized losses will be netted against realized gains
2. If there are not enough realized gains to offset the losses, then the net loss will be netted against the monthly interest distribution "interest"
3. If there is not enough interest to offset the net loss then participants with "active" accounts will share the loss based on their average daily balance as a percentage of the average daily balance of the total pool
    a. Active accounts are defined as an account that maintained a balance during the month when the net loss was recognized

B. Impaired Investments

An evaluation will be documented by internal staff to determine if an investment is impaired. The evaluation will provide the following details:

1. If the investment is anticipated to continue to receive principal and/or interest payments
2. When it is estimated that the losses will be recognized
3. What the anticipated realized loss is on the investment
4. Recommended plan with options to offset losses and liquidate impaired assets

If the investment is deemed to continue to receive interest payments, they will be placed in a loss reserve account to offset future recognized losses on the impaired asset.

Appendix B

Broker/Dealer Due Diligence Policy:

It will be at the discretion of the Treasurer's Office in regards to which broker/dealers are given consideration. We will strive to have relationships with multiple approved brokers and dealers to ensure that we receive the best trade execution and coverage. Brokers and dealers will be placed on a trial period before being placed on the approved list. The approved list will be maintained and sent to Treasurer and Chief of Staff quarterly for their review.

1. Items to be reviewed and filed annually:
    a. Statement of Financial Health, focus report or annual report (form 10K)
    b. Value delivered by broker/dealer
2. Items reviewed ongoing:
    a. News on the broker/dealer
    b. Quality of trade execution and coverage

After the review of the aforementioned items, there will be a decision if the broker/dealer should remain as an approved broker/dealer for use. If it is decided that the broker/dealer should not remain approved for use, the broker/dealer will be notified of the reasons and given a probationary period to correct the reasons. However, if the reasons are not corrected, the relationship will be terminated.