

City of Alexandria, Virginia
Investment Policy
Adopted June 4, 2008

1. Policy Statement

It is the policy of the City of Alexandria that the administration of Deposits of Cash and Cash Equivalents, and their investment, shall be handled as its highest public trust. Investments shall be made in a manner that provides maximum security of principal invested and conforms to all applicable statutes of the Commonwealth of Virginia governing the investment of public funds. The portfolio shall consist of U.S. Treasuries, Agencies, "prime-quality" commercial paper (suspended pending future authorization by the City's Investment Committee), repurchase agreements and/or the Virginia Local Government Investment Pool. The portfolio shall have an average maturity of up to one year, while remaining liquid to meet the daily cash flow needs of the City. The receipt of a market rate of return will be secondary to safety and liquidity requirements.

2. Scope

This investment policy applies to all Deposits of Cash and Cash Equivalents, defined in the City of Alexandria's Comprehensive Annual Financial Report (CAFR), excluding pension funds. The City commingles its funds into one pooled investment fund for efficiency and maximum investment opportunity. Any new Deposits of Cash and Cash Equivalents will also be commingled unless specifically exempted by City Council and this policy. Investment income will be allocated to the various funds based on their respective participation and in accordance with generally accepted accounting principles.

3. Objective and Strategy

It is the policy of the City of Alexandria that all Deposits of Cash and Cash Equivalents shall be managed and invested with three primary objectives, listed in order of their priority: safety, liquidity and yield.

a. Safety of Principal. Safety of principal is the foremost objective of the City of Alexandria. Investments of the City shall be made in a manner that seeks to ensure the preservation of capital in the overall portfolio. The objective will be to mitigate credit risk and interest rate risk.

The City will minimize credit risk, the risk of loss due to the failure of the security issuer or backer, by:

Limiting investments to the safest types of securities.

Pre-qualifying the financial institutions, broker/dealers, intermediaries and advisers with which the City will do business.

Diversifying the investment portfolio so that potential losses on individual securities will be minimized.

The City will minimize the risk that the market value of securities in the portfolio will fall due to changes in general interest rates, by:

Structuring the investment portfolio so that securities mature to meet cash requirements for ongoing operations, thereby avoiding the need to sell securities on the open market prior to maturity.

Investing operating funds primarily in shorter-term securities.

b. Liquidity. The City of Alexandria's investment portfolio will remain sufficiently liquid to enable it to meet all operating requirements that might be reasonably anticipated. This will be accomplished by structuring the portfolio so that securities mature concurrent with cash needs to meet anticipated demands. Furthermore, since all possible cash demands cannot be anticipated, the portfolio will consist largely of securities with active secondary or resale markets.

Cash flow forecasting is designed to ensure adequate liquid funds to meet the City of Alexandria's cash-flow requirements. Supplemental to the financial and budgetary systems, the Investment Committee and the external cash manager will maintain a cash-flow forecasting process designed to monitor and forecast cash positions for investment purposes.

c. Yield. The City of Alexandria's investment portfolio shall be structured with the objective of attaining a market rate of return throughout budgetary and economic cycles, taking into account the City's investment risk constraints and liquidity needs. "Market rate of return" may be defined as the average yield of the current six-month U.S. Treasury Bill. Return on investment is of secondary importance compared to the safety and liquidity objectives described above. The core of investments is limited to relatively low risk securities in anticipation of earning a fair return relative to the risk being assumed. Securities shall not be sold prior to maturity with the following exceptions:

A security with declining credit may be sold early to minimize loss of principal.

A security swap would improve the quality, yield, or target duration in the portfolio.

Liquidity needs of the portfolio require that the security be sold.

4. Legal Limits, Responsibilities, and Authority

Specific parameters for the investment of public funds in Virginia are found in Sections 2.2-4500 through 2.2-4606 of the Code of Virginia.

5. Delegation of Investment Authority

The Deputy City Manager, the Director of Finance, and the Treasury Division Chief are designated as the City's Investment Committee and are responsible for investment management decisions and activities. The Investment Committee may delegate the daily investment activities to an external cash manager procured through the competitive bidding process or to the Investment Division of the Virginia Department of the Treasury, which manages the Virginia Local Government Investment Pool. The Investment Committee is responsible for considering the quality and ability of the City staff and external cash manager involved with investment management and procedures. All participants in the investment process shall seek to act responsibly as custodians of the public trust.

The external cash manager shall develop and maintain written administrative procedures and internal controls specific to the City of Alexandria's investment program, which are consistent with this investment policy. These procedures will include TBMA Master Repurchase Agreements, master custodial agreements, wire transfer agreements, internal controls, authorized investments, authorized dealers, diversity and maturity limitations, safekeeping and collateralization, delivery versus payment, and other investment-related activities. The written procedures will be approved initially, and reviewed annually, by the Investment Committee and the City's independent auditors.

The external cash manager shall be responsible for all transactions undertaken and shall establish controls to regulate the activities of subordinate officers and staff. The external cash manager shall designate a backup in the event circumstances require timely action when the external cash manager is not available. No officer or designee may engage in any investment transaction except as provided under the terms of this policy and the external cash manager's written procedures, once they are approved by the Investment Committee.

6. Prudence

The standard of prudence to be used by investment officials shall be the "prudent person" standard and shall be applied in the context of managing the City's overall portfolio. The standard states:

"Investments shall be made with judgment and care, under circumstances then prevailing, which persons of prudence, discretion, and intelligence exercise in the management of their own affairs, not for speculation, but for investment, considering the probable safety of their capital as well as the expected income to be derived."

Limitation of personal liability. The Investment Committee, and those delegated with investment authority under this policy, when acting in accordance with the written procedures and this investment policy, and exercising due diligence, shall be relieved of personal responsibility for an individual security's credit risk or market changes, provided deviations from expectations are reported in a timely fashion and the liquidity and the sale of securities are carried out in accordance with the terms of this policy.

7. Ethics and Conflicts of Interest

Officers and employees involved in the investment process shall refrain from personal business activity 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 or 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 City.

8. Internal Controls

The external cash manager shall establish written internal controls that will be reviewed annually by the Investment Committee and by the City of Alexandria's independent auditors. The controls shall be designed to prevent loss of public funds due to fraud, employee error, misrepresentation by third parties, unanticipated market changes or imprudent actions by employees of the City of Alexandria or of the external cash manager. 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 a control should not exceed the benefits likely to be derived and (2) the valuation of costs and benefits requires estimates and judgments by management.

The internal controls shall address the following points:

- Control of collusion
- Separation of transaction authority from accounting and recordkeeping
- Custodial safekeeping
- Avoidance of physical delivery securities
- Clear delegation of authority to subordinate staff members
- Written confirmation of transactions for investments and wire transfers
- Development of a wire transfer agreement with the lead bank and third-party custodian

9. Authorized Financial Dealers and Institutions

All investment transactions on behalf of the City of Alexandria must be restricted to approved broker/dealers. The external cash manager shall maintain a list of brokers and dealers, which are approved for investment purposes. For brokers and dealers of government securities, the external cash manager shall select only primary government securities dealers that report daily to the New York Federal Reserve Bank. Investment officers shall not conduct business with any securities dealer with whom or through whom public entities have paid excessive prices or have sustained losses on investments through mismanagement by the securities dealer. The external cash manager must periodically (at least annually) assess the financial strength and integrity of the broker/dealer firms and the individual account representatives with whom it does business. The list must be approved by the City's Investment Committee before investing any City funds. The following criteria must be met by those firms on the list:

- a. Provide an audited financial statement for the most recent period.
- b. Proof of certification by the National Association of Securities Dealers.
- c. Proof of current registration with the State Securities Commission.
- d. Completion of the City of Alexandria's broker/dealer questionnaire.

In addition, the supervising officers at each depository, recognized securities broker/dealer, and the external cash investment management service shall submit certifications that they have reviewed this investment policy and agree to disclose potential conflicts or risks to public funds that might arise out of business transactions between the firm/depository and the City of Alexandria. All depositories and the external cash manager shall agree to undertake all reasonable efforts to preclude imprudent transactions involving City funds.

The supervising officer of the depositories or firms shall agree to exercise due diligence in monitoring the activities of other officers and subordinate staff members engaged in transactions with the City. Employees of any firm or financial institution offering securities or investments to the City of Alexandria shall be trained in the precautions appropriate to public sector investments and shall be required to familiarize themselves with the City's investment objectives, policies, and constraints.

As investments are made, the external cash manager shall rotate from the authorized bidder's list for bids/offers. An attempt will be made to alternate to all names on the list.

10. Authorized Investments

Under this policy, investments shall be limited to the instruments listed below. The investments are to be chosen in a manner that promotes diversity of issuer and maturity. The choice of high-grade government instruments is designed to ensure the marketability of those investments should liquidity needs arise.

a. Obligations of the United States Government, and direct borrowings of United States Government Agencies and Instrumentalities, and United States Government Sponsored Enterprises, with a stated maturity not to exceed three years and a liquid market with a readily determinable market value.

b. Repurchase agreements, collateralized by U. S. Treasuries, not to exceed 180 days to stated maturity. An executed TBMA Master Repurchase Agreement with supplemental amendments must be on file with the City of Alexandria and the counter party bank or primary dealer.

To anticipate market changes and provide a level of additional security for all funds, the collateralization level required will be 102 percent of the market value of the principal and accrued interest. U. S. Treasury Notes will be the only acceptable securities for collateral.

c. "Prime Quality" commercial paper, with a maturity of 270 days or less, of issuing corporations organized under the laws of the United States, or of any state thereof including paper issued by banks and bank holding companies. (Suspended pending future authorization by the City's Investment Committee.) "Prime Quality" shall be as rated by at least two of the following: Moody's Investor Services, Inc., within its NCO/Moody's rating of prime 1, by Standard & Poor's, Inc., within its rating of A-1, by Fitch Investor's Services, Inc., within its rating of F-1, or by Duff and Phelps, Inc., within its rating of D-1, or by their corporate successors, provided that at the time of any such investment: 1. The issuing corporation, or its guarantor, has a net worth of at least fifty million dollars; and 2. The net income of the issuing corporation, or its guarantor, has averaged three million dollars per year for the previous five years; and 3. All existing senior bonded indebtedness of the issue, or its guarantor, is rated "A" or better or the equivalent rating by at least two of the following: Moody's Investors Services, Inc., Standard & Poor's, Inc., Fitch Investor's Services, Inc., or Duff and Phelps, Inc. The commercial paper must be backed by a bank line of credit equal to 100 percent of the issuer's outstanding commercial paper.

d. Virginia Local Government Investment Pool.

The external cash manager must review the portfolio at least weekly to ensure compliance with the City's investment policy and to review the credit ratings of all securities in the investment portfolio. The external cash manager will promptly notify the Investment Committee in the event that any investment no longer meets the original purchase requirements. The external cash manager and the Investment Committee will then review and discuss available alternatives and arrive at an agreed upon course of action. The external cash manager will issue monthly reports confirming their findings.

Competitive Bidding Requirement. Securities will only be purchased or sold after (3) offers/bids are taken to verify that the City of Alexandria is receiving fair market value/price for the investment. Records will be maintained of the bids offered, the bids accepted, and the justification for each investment decision.

Delivery Versus Payment. All security transactions, including collateral for repurchase agreements, entered into by, or on behalf of, the City of Alexandria, shall be conducted on a delivery versus payment (DVP) basis. Written trade confirmation tickets must be received by the external cash manager and Treasury Division Chief within three business days of all trades. A manager who is not authorized to buy or sell securities for this portfolio must receive and review the written trade confirmation tickets. The written trade confirmation ticket must provide the trade date, par value, maturity, interest rate, price, yield, settlement date, description of security purchased, issuer's name, amount due, third-party custodial information, and show City of Alexandria as owner of security.

11. Unauthorized Investments

- a. The City will not "sell short," i.e., sell something it does not own in hope of buying it later at a lower price.
- b. The City will not buy on margin.
- c. The City will not contract for future delivery.
- d. The City will not deal in futures or options of any kind.

12. Diversity and Maturity Limitations

The investment portfolio shall be diversified by:

limiting investments to avoid overconcentration in securities from a specific issuer or business sector (excluding U.S. Treasury securities),
 limiting investment in securities that have higher credit risks,
 investing in securities with varying maturities, and
 continuously investing a portion of the portfolio in overnight repurchase agreements to ensure that appropriate liquidity is maintained in order to meet ongoing obligations.

Diversification strategies shall be established and periodically reviewed. At a minimum, diversification standards by security type and issuer shall be:

Security Type	Maximum Percentage of the Total Funds Available For Investment
a. U. S. Treasuries and securities with the U. S. Government's guarantee	85%
b. U. S. Government agencies and instrumentalities	85%
c. Repurchase agreements, fully collateralized by U. S. Treasuries	50%
d. Commercial Paper (in total)	35%
e. Commercial Paper of any one Issuing Corporation	5%
f. Virginia Local Government Investment Pool	100%

The external cash manager shall diversify maturities, and to the extent possible, match investments with anticipated cash flow requirements. Matching maturities with cash flow dates will reduce the need to sell securities prior to maturity, thus reducing market risk. The average maturity of the City's investment portfolio at the end of any given month shall be up to one year. No less than \$15 million will be invested in securities with maturities of 14 days or less. Excluding the Virginia Local Government Investment Pool, securities with more than 36 months to maturity are not authorized for the City's investment portfolio.

13. Safekeeping and Collateralization

All trades where applicable will be executed by delivery versus payment (DVP) to ensure that all securities are deposited in an eligible financial institution prior to the release of funds. Securities will be held in safekeeping in the City of Alexandria's name in a segregated or pledged position in the Trust Department's account of an independent third-party custodial bank at the Federal Reserve Bank or Depository Trust Company (DTC). The custodial bank may not be within the same holding company as the bank from which the securities are pledged. At no time will the City's securities or collateral for repurchase agreements be commingled with those of other investors.

All safekeeping arrangements shall be approved by the Investment Committee and an agreement of the terms executed in writing. The third-party custodian shall issue original safekeeping receipts to the external cash manager, and duplicates to the Treasury Division Chief, listing each specific security, rate, description, maturity and cusip number. Each safekeeping receipt will clearly state that the security is held for the City of Alexandria or pledged for the City of Alexandria.

14. Perfected Security Interest

To ensure the City has a perfected security interest, the external cash manager must obtain written authorization from the City's Investment Committee prior to selling any security from the City's investment portfolio. Prior to making a purchase on behalf of the City, the external cash manager must notify the City's Investment Committee of the par value, maturity range, and type of security to be purchased.

15. Performance Evaluation and Reporting

By the fifth of each month, the external cash manager shall submit monthly reports to the Investment Committee containing sufficient information to permit an informed outside reader to evaluate the performance of the investment program. By July 5 each year, the external cash manager shall submit an annual report to the Investment Committee. The reports will be prepared and reviewed by individuals who are not responsible for buying and selling securities. In addition, the market value of the portfolio shall be calculated at least monthly and a statement of the market value of the portfolio shall be issued at least monthly. The reports will summarize investment activity and include, at a minimum, the following information:

Monthly Investment Portfolio Inventory Reports. Securities will be grouped by type, and will include the following information:

- Name of issuer
- Par amount
- Coupon Rate
- Contractual maturity date
- Call date, if applicable

Amortized cost (book value)
Fair value (market value)
Expected yield
Unrealized gain or loss
Credit rating
CUSIP number
Purchase price
Original dollar amount of premium or discount
Yield to maturity or total return if held to maturity
Yield to call, or total return if held to call, if applicable
Interest received
Accrued interest
Amortized/Accretion Premium/Discount
Percentage of total portfolio that specific security comprises

Monthly Investment Portfolio Activity Reports. Listing of purchases, sales, calls, maturities, interest received, rating upgrades and rating downgrades, and beginning and ending par, book, and market values.

Monthly Investment Portfolio Liquidity Reports. Listing of investments by maturity date, and a maturity breakdown of the portfolio by type of investment and by time period.

Monthly Investment Portfolio Earnings Summary Reports. Listing of interest earnings accrued, amortization/accretion, and total earnings for the month and fiscal year-to-date.

Monthly Investment Portfolio Unrealized Gains and Losses Report.

Monthly Investment Portfolio Performance Reports. Listing of average weighted yield-to-maturity and yield-at-cost for current month and fiscal year-to-date, with comparison to the six-month U.S. Treasury Bill and average Federal Funds Rate.

Monthly Investment Policy Compliance Reports.

16. Policy Considerations

This policy shall be reviewed on an annual basis. The City's Investment Committee must approve any change.