GF1 PLUS INVESTMENT POLICY GUIDELINES Fiscal Year 2024-2025

Objectives

Return Requirements: Georgia Fund 1 Plus (GF1 Plus) is established as an alternative investment option for LGIP participants within the State of Georgia. The objective of GF1 Plus is to provide investors the potential of a higher return on their investment by adding credit-oriented investments. GF1 Plus will be managed as a low-risk, rates and credit portfolio employing external investment managers with expertise in managing fixed-income portfolios in the corporate credit markets.

GF1 Plus can use Target Maturity Portfolios (TMPs). Any TMPs used will be segregated into a separate portfolio for performance measurement purposes.

Outside of the TMPs the maximum allocation for the GF1 Plus Credit Portfolio is 50%. The Office of the State Treasurer (OST) has the discretion to manage the rates and credit allocation based on changes in economic and/or market conditions.

Risk Tolerance: GF1 Plus has a low tolerance for risk. A "shadow" NAV will be calculated monthly.

Constraints

Liquidity: GF1 Plus has procedures in place to ensure liquidity is managed efficiently. Deposits/redemptions require 7 days prior notice unless otherwise approved by the Treasurer and will take place on the first business day of the month following the notice. It is up to the OST portfolio manager to assess the market risks and cash needs to provide sufficient liquidity to meet cash flow needs of the participants.

Weighted Average Maturity (WAM): The combined GF1 Plus Rates and GF1 Plus Credit portfolio are restricted to a maximum WAM of 120 days. Individually, the GF1 Plus Rates portfolio is restricted to a maximum WAM of 120 days and the GF1 Plus Credit portfolio is restricted to a maximum WAM of 90 days. TMPs will be constrained by the time frame assigned to the TMP with a maximum of 5 year without credit exposure and 2 years with credit exposure. (Credit exposure between 2 and 5 years may be authorized for specific TMPs by OST.)

Maximum Counterparty Concentration: Concentration with any single counterparty should not exceed 25% on an aggregate basis with the exception US Government and US Government Agencies (GSEs). See, "Concentration" section in Credit Portfolio Guidelines for additional exposure limits.

Laws and Regulations: GF1 Plus is created by State Code Section 36-83-2 and 36-83-8. Authorized investments for pool assets shall be limited to those set forth in State Code Sections 50-17-2, 50-17-27 and, 50-17-63.

Unique Preferences and Circumstances: The liquidity requirements and low risk tolerance are both significant factors affecting the management of GF1 Plus.

Allocation Process: The OST portfolio manager may use an optimization model to inform allocations between Rates, Credit and TMP portfolios.

GF1 PLUS "RATES PORTFOLIO" POLICY GUIDELINES Fiscal Year 2024-2025

<u>Authorized Investments:</u> All investments must adhere to the "credit quality" requirements prescribed by the current OST Investment Policy adopted by the State Depository Board and credit limits prescribed by the current OST Counterparty Risk Assessment Model.

- 1. Repurchase agreements that meet the requirements of State Code Section 50-17-2.
- 2. Georgia Fund 1
- 3. GEAP
- 4. GEAP Plus
- 5. Deposits with approved state depositories:
 - a. Rated 'A-2'/'P-2'/'F2' (S&P, Moody's, Fitch) or higher, or
 - b. Collateralized by Federal Home Loan Bank Letters of Credit (LOC), or
 - c. 110% collateralized or as otherwise permitted by the state depository board, or
 - d. Secured through the Georgia multibank pledging pool program (Secure Deposit Program), or
 - e. Fully insured by the FDIC; or
 - f. If non-collateralized, deposits must be in accordance with the "OST Counterparty Risk Assessment Model". Only banks 'A-2'/'P-2'/'F2' (S&P, Moody's, Fitch) or higher ranked in the top two risk categories (Very Low or Low) are eligible to offer a non-collateralized account. Within the two risk categories, the amount eligible to invest in these types of deposit agreements (as defined by the OST Investment Policy adopted by the State Depository Board) is limited to the "CP limit" exposure. If OST holds CP or other obligations issued by the same counterparty, the amount eligible to invest in a deposit agreement is reduced by that amount. If an institution's risk level increases from an eligible to ineligible exposure category, OST may determine continued non-collateralized eligibility and risk exposure through supplemental analysis and Investment Committee review.
 - g. Certificates of Deposits are not to have maturities exceeding one year. OST shall not place funds in CDs at any depository if such placement of funds will result in total state deposits at such depository in excess of 100% of total equity capital. Provided, however, that the Treasurer may authorize placement of funds in CDs at a depository if such placement of funds will result in total state deposits not to exceed 125% of total equity capital on an as needed basis to allow for fluctuations in demand deposit balances. All CDs must be secured by collateral permitted by statute. Surety bonds acceptable as security for CDs shall require approval by the State Depository Board with such credit constraints or limitations it determines. Pledged securities shall be held by a third-party custodian approved by OST. Pledged securities shall be marked-to-market at least

monthly with depositories required to initially pledge to OST, and thereafter maintain upon notification of any shortfall, collateral having a market value equal to 110% of CDs.

- 6. U.S. Treasury Obligations
 - a. Treasury Bills
 - b. Treasury Notes
 - c. Treasury Bonds
 - d. Treasury Inflation-Protected Securities (TIPS)
 - e. Treasury Floating Rate Notes
- 7. Obligations issued by the following Government Sponsored Enterprises (GSEs)
 - a. Federal Farm Credit Bank (FFCB)
 - b. Federal Home Loan Bank (FHLB)
 - c. Federal Home Loan Mortgage Corporation (FHLMC)
 - d. Federal National Mortgage Association (FNMA)
 - e. Government National Mortgage Association (GNMA)

Types of Agency Securities:

- a. Discount Notes
- b. Callable Agencies
- c. Fixed Rate Notes
- d. Floating Rate Notes
- 8. Obligations issued by the government of any foreign country. Direct obligations of the government of any foreign country must be rated A or higher by a nationally recognized rating agency.
- 9. International Bank for Reconstruction and Development (IBRD) or the International Finance Corporation (IFC). Obligations issued, assumed, or guaranteed by the IBRD or the IFC must be rated A or higher by a nationally a recognized rating agency.
- 10. Municipal Obligations Obligations issued by this state or its agencies or other political subdivisions of this state. Such investments, if meeting statutory investment requirements, may be approve for investment by the Treasurer with the requirement that they are of high credit quality and are reported to the State Depository Board.
- 11. Approved Money Market Mutual Funds
- 12. Georgia Fund 1 Prime (GF1 Prime)

Rates Portfolio WAM Details:

- 1. The GF1 Plus Rates portfolio will be managed with at maximum WAM of 120 days.
- 2. The maximum maturity of individual fixed rate securities cannot exceed 2 years plus 10 days from the date of purchase.
- 3. Variable rate and floating rate securities shall not have a final maturity to exceed 3 years for U.S. government securities or 550 days for all non-U.S. government securities.

GF1 PLUS "CREDIT PORTFOLIO" INVESTMENT GUIDELINES Fiscal Year 2024-2025

Authorized Investments:

- 1. Cash Equivalents
 - a. Georgia Fund 1
 - b. Repurchase agreements that meet the requirements of State Code Section 50-17-2. The Investment Advisor will adhere to investment restrictions provided by OST. The Investment Advisor must request approval to purchase an issuer on the restricted list subject to written approval by the Office of the State Treasurer.
- 2. U.S. Treasury Obligations
 - a. Treasury Bills
 - b. Treasury Notes
 - c. Treasury Bonds
 - d. Treasury Inflation-Protected Securities (TIPS)
 - e. Treasury Floating Rate Notes
- 3. Obligations issued by the following Government Sponsored Enterprises (GSEs)
 - a. Federal Farm Credit Bank (FFCB)
 - b. Federal Home Loan Bank (FHLB)
 - c. Federal Home Loan Mortgage Corporate (FHLMC)
 - d. Federal National Mortgage Association (FNMA)
 - e. Government National Mortgage Association (GNMA)

Types of Agency Securities:

- a. Discount Notes
- b. Callable Agencies
- c. Fixed Rate Notes
- d. Floating Rate Notes
- e. Mortgage-Backed Securities including passthroughs, CMOs, and PACs.

Eligible Corporate/Other Obligations

Listed below are specific guidelines for eligible corporate and other obligations. The Investment Advisor will adhere to issuer and counterparty restrictions as provided by OST. The Investment Advisor must request approval to purchase an issuer on the restricted list subject to approval by the Office of the State Treasurer.

- 1. Commercial paper issued by domestic corporations rated no lower than P-1 by Moody's Investor Service, A-1 by Standard and Poor's Corporation, or F1 by Fitch Ratings.
- 2. Negotiable Certificates of Deposit with domestic financial institutions rated a minimum of A-1 or higher by Standard and Poor's Corporation or P-1 or higher by Moody's Investor Service or F1 or higher Fitch Ratings and that meet the requirements of OCGA § 50-17-63.
- 3. Corporate primary debt obligations of domestic corporations rated a minimum of A3/A-or higher by Moody's, S&P, or Fitch and that meet the requirements of OCGA 50-17-63.
- 4. Asset-backed securities. Pursuant to O.C.G.A. 50-5A-7(b), asset-backed securities rated AAA, having broad liquidity reflecting at least \$350 million of outstanding issuance and issued by an underlying credit rated A3/A- or higher by Moody's Investor Service or Standard and Poor's Corporation or Fitch Ratings. Only the A1 or A2 tranches of any issue can be purchased. ABS transactions consisting of consumer receivables must be considered Prime.
- 5. Commercial mortgage-backed securities. Pursuant to O.C.G.A. 50-5A-7(b), commercial mortgage-backed securities rated AAA by Standard and Poor's Corporation, Moody's Investor Service or Fitch Ratings.
- 6. In the event of a downgrade that renders an obligation ineligible, the advisor shall notify OST immediately. Unless instructed otherwise the advisor shall sell or otherwise dispose of the obligation as soon as possible, but not more than 90 days thereafter. This period may be extended only with the express written consent of the Treasurer.
- 7. Such other investments authorized pursuant to OST's investment policy and guidelines and approved in writing by OST.
- 8. Approved Money Market Mutual Funds

Exceptions

In the event a question arises as to whether a type of security is eligible for investment, the manager shall present an analysis and recommendation to the Treasurer and shall not invest in that type of security unless express written permission from the Treasurer has been received.

Credit Portfolio WAM details

- 1. The credit portfolio will be managed with a maximum WAM of 90 days.
- 2. The maximum maturity of individual fixed securities cannot exceed 550 days from the date of purchase. The limit for structured product including Asset-Backed Securities and Commercial Mortgage-Backed Securities shall be applied to the Weighted Average Life (WAL) at the time of purchase. The weighted average life of ABS and CMBS cannot exceed 1.5 at the time of purchase.
- 3. Variable rate and floating rate securities shall not have a final maturity to exceed 2 years for U.S. government securities or 550 days for all non-U.S. government securities. The limit for structured product including Asset-Backed Securities and Commercial Mortgage-Backed Securities shall be applied to the Weighted Average Life (WAL) at the time of purchase. The average life of ABS and CMBS cannot exceed 1.5 at the time of purchase.
- 4. As soon as practicable after the end of each calendar quarter, the Investment Advisor shall provide a quarterly report with the WAM of each security as well as the overall WAM of the portfolio.

Concentration

- 1. U.S. treasuries, government agency securities, secured certificates of deposits, treasury/agency repo, and government money market funds shall have no issuer limit. The maximum Parent Sponsor limit of any combination of credit securities (e.g., commercial paper, single issuer asset backed commercial paper, negotiated CDs, corporate bonds, asset back securities, and commercial mortgage-backed securities) is \$100MM for each Investment Advisor at time of purchase. Multi-seller Asset Backed Commercial Paper can be considered its own Parent Sponsor for purposes of aggregating credit securities. The issuer must be included on the Investment Advisor's approved list.
- 2. The Investment Advisor can purchase Parent Sponsor total amounts higher than the \$100MM issuer limit only if approved by OST. OST assessment for any potential higher limits will be based on the OST Counterparty Risk Assessment Model and other fundamental analysis as necessary.

GF1 PLUS "TMP PORTFOLIO" POLICY GUIDELINES Fiscal Year 2024-2025

<u>Authorized Investments:</u> All investments must adhere to the "credit quality" requirements prescribed by the current OST Investment Policy adopted by the State Depository Board and credit limits prescribed by the current OST Counterparty Risk Assessment Model. External credit guidelines should also be followed for investments placed by external investment managers.

This GF1 Plus sub-portfolio has been established for purposes of OST directing certain Target Maturity Portfolio (TMP) investments. TMPs used within GF1 Plus are limited to maturities of 5 years or less. OST may direct in writing further investment limitations than are found in the GEAP Plus Target Maturity Portfolios Investment Policy Guidelines for use in GF1 Plus. Please see GEAP Plus Target Maturity Portfolios Investment Policy Guidelines for security limitations used within TMP portfolios.