

INVESTMENT POLICY

December 2, 2025



City of Ontario
303 East B Street
Ontario, CA 91764
909-395-2000
www.ontarioca.gov



**City of Ontario
Investment Policy Statement**

TABLE OF CONTENTS

1	Purpose	2
2	Scope	2
3	Delegation of Authority	3
4	Prudence	3
5	Investment Objectives	3
6	Ethics and Conflicts of Interest	4
7	Internal Controls	4
8	Safekeeping of Securities	5
9	Reporting	5
10	Qualified Dealers	5
11	Competitive Bidding	6
12	Purchase and Sale of Securities	6
13	Policy Review	6
14	Diversification	6
15	Maximum Maturities	7
16	Table of Authorized Investments	8
17	Description of Authorized Investments	9
18	Investment Pools/Mutual Funds	13
19	Collateralization	13
20	Prohibited Investments	14
21	Review of the Investment Portfolio	14
22	Glossary of Investments Terms	15
	APPENDIX A – List of Resolutions for Investment of Inactive Funds in LAIF.....	23
	APPENDIX B – List of Resolutions for Investment of City Funds	24

CITY OF ONTARIO
INVESTMENT POLICY STATEMENT

1. PURPOSE

This Statement of Investment Policy (“Policy”) is intended to: (a) describe the policies and procedures utilized in the City of Ontario (“City”) investment management system; (b) put in place guidelines for the prudent investment of the City’s funds; and (c) list and describe suitable investments.

The goals of the City’s investment policy and investment management function are enhancement of the economic status of the City and protection of the City’s funds.

The investment policies and practices of the City are based upon Federal and State law, as well as prudent money management principles. The primary goals of these policies are:

- A. To ensure compliance with all laws governing the investments under the control of the City Treasurer.
- B. To protect the principal monies entrusted to this office.
- C. To generate the maximum amount of investment income consistent with the parameters established in this Policy.

This policy is written to incorporate industry best practices and recommendations from sources such as the Government Finance Officers Association (GFOA), California Municipal Treasurers Association (CMTA), California Debt and Investment Advisory Commission (CDIAC) and the Association of Public Treasurers (APT).

2. SCOPE

This Policy applies to all monies belonging to the City and proceeds from bonds or notes issued by the City, and any authorized special districts with the following exceptions:

- Bond proceeds and any funds associated with bond issues and other monies arising from bond indebtedness are further restricted by the pertinent bond indenture.
- CalPERS, OPEB trusts, and the investment of employees’ deferred compensation funds invested pursuant to Government Code Section 53609.

Funds described above are accounted for in the City’s Annual Comprehensive Financial Report. The City will comply with all applicable sections of the Internal Revenue Code of 1986, Arbitrage Rebate Regulations, and bond covenants with regards to the investment of bond proceeds. All monies entrusted to the City Treasurer will be pooled in an actively managed

portfolio and will be referred to as the “fund” or the “portfolio” throughout the remainder of this document.

3. DELEGATION OF AUTHORITY

In accordance with state law (California Government Code Section 53607) and under the authority granted by the City Council (refer to appendix A and B for list of resolutions), the City Treasurer and Deputy City Treasurer(s) are authorized to invest the unexpended cash in the City treasury. The responsibility for the day-to-day investment of the City’s funds is delegated to the Chief Investment Officer. In the absence of the Chief Investment Officer, the Deputy City Treasurer will be responsible for the investment function. The City may engage the services of one or more external investment advisers (who are registered under the Investment Advisers Act of 1940) to assist in the management of the City’s investment portfolio in a manner consistent with the City’s objectives. External investment advisers may be granted discretion to purchase and sell investment securities in accordance with this Policy.

4. PRUDENCE

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 the City’s capital as well as the probable income to be derived. The standard of prudence to be used by investment officials shall be the “prudent investor” standard (California Government Code Section 53600.3) and shall be applied in the context of managing an overall portfolio. Investment officers (acting in accordance with written procedures and the investment policy and exercising due diligence) shall be relieved of personal responsibility for an individual security’s credit risk or market price changes, provided deviations from expectations are reported in a timely fashion and appropriate action is taken to control adverse developments.

5. INVESTMENT OBJECTIVES

A. Safety of Principal

Safety of principal is the foremost objective of the investment policies and practices of the City. Investment decisions shall seek to minimize net capital losses on a portfolio basis. This Policy recognizes that market conditions may warrant the sale of individual securities incurring losses in order to protect against further and more substantial capital losses. The intent of this Policy is to ensure that capital losses are minimized on a portfolio level rather than on each transaction. The City shall seek to preserve principal by mitigating credit risk and market risk.

- 1) Credit Risk – Defined as the risk of loss due to failure or insolvency of an issuer, credit risk shall be mitigated by diversifying the fund so that the failure of any one issuer would not unduly harm the City’s cash flow. No more than five percent (5%) of the total market value of the portfolio may be invested (at time of purchase) in the securities of any one single issuer unless otherwise specified in this policy.

- 2) Market Risk – Defined as the risk of market value fluctuations due to changes in the general level of interest rates. Because longer maturity fixed-income securities have greater market risk than shorter maturity securities, market risk will be mitigated by limiting the weighted average maturity of the fund to two and a half (2 ½) years. The maximum stated final maturity of individual securities in the portfolio will be five (5) years, except where otherwise stated. It is explicitly recognized that in an active portfolio, occasional losses are inevitable and must be considered within the context of the overall investment return.

B. Liquidity

The City's fund will be structured to ensure that the projected expenditure requirements of the City for the next six (6) months can be met with a combination of anticipated revenues, maturing securities, principal and interest payments, and liquid instruments as required by California Government Code Section 53646.

C. Performance Measurement

The performance of the City's investment portfolio will be measured on a total return basis. The portfolio's performance will be measured against an appropriate market-based benchmark. Benchmarks may change over time based on changes in market conditions or cash flow requirements. The benchmark's returns are reported monthly on the City's current portfolio report.

6. ETHICS AND CONFLICTS OF INTEREST

All participants in the investment process shall act as custodians of the public trust. Investment officials shall recognize that the investment portfolio is subject to public review and evaluation. Thus, employees and officials involved in the investment process shall refrain from personal business activity that could create a conflict of interest or the appearance of a conflict with proper execution of the investment program, or which could impair their ability to make impartial investment decisions.

Employees and investment officials shall disclose to the Investment Officer any material interests in financial institutions with which they conduct business, and they shall further disclose any large personal financial/investment positions that could be related to the performance of the investment portfolio. Employees and officers shall refrain from undertaking any personal investment transactions with the same individual with whom business is conducted on behalf of the City.

7. INTERNAL CONTROLS

The City Treasurer is responsible for establishing and maintaining an internal control structure designed to ensure that the assets of the entity 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 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.

Periodically (as deemed appropriate by the City) an independent analysis by an external auditor shall be conducted to review internal controls, account activity, and compliance with policies and procedures.

8. SAFEKEEPING OF SECURITIES

All securities owned by the City (including collateral for repurchase agreements) shall be held in safekeeping by the City's custodial bank or a third-party bank trust department acting as agent for the City under terms of a custody or trustee agreement executed by the bank and the City (with the exception of insured Certificates of Deposit ("CD"), the Local Agency Investment Fund of the State of California, and Joint Powers Authority Pool). All securities will be received and delivered using standard delivery versus payment ("DVP") procedures and in accordance with State Code.

9. REPORTING

The City Treasurer is required to submit an investment report on a quarterly basis to the City Manager, the Internal Auditor, and the City Council in accordance with California Government Code Section 53646. The report is required to be submitted within forty-five (45) days of the end of the quarter. The City Treasurer has elected to provide this report monthly. This report will include the following information:

- Type of investment instrument (i.e., Treasury Bill CD)
- Issuer name (i.e., U.S. Treasury Note)
- Purchase date (trade and settlement date)
- Maturity date
- Par value
- Purchase price
- Current market value and source of valuation
- Overall portfolio yield based on cost
- Statement of compliance of the portfolio to the investment policy or an explanation of the manner in which the portfolio is not in compliance
- Description of any of the City's funds that are under the management of contracted parties
- Statement denoting the ability of the City to meet its expenditure requirements for the next six (6) months, or an explanation as to why sufficient money may not be available

10. QUALIFIED DEALERS

The Chief Investment Officer or designee shall maintain a list of financial institutions qualified to do business with the City. Banks and broker/dealers will be selected on the basis of creditworthiness, experience, and capitalization. Prior to approval, they must read and sign

the City's Broker/Dealer Questionnaire and Certification. In accordance with California Government Code Section 53601, a bank or broker/dealer must be qualified as a dealer regularly reporting to the New York Federal Reserve Bank ("Primary Dealer") to conduct repurchase agreements with the City.

Selection of financial institutions and broker/dealers authorized to engage in transactions will be at the sole discretion of the City, except where the City utilizes an external investment adviser in which case the City may rely on the adviser for selection.

Selection of broker/dealers used by an external investment adviser retained by the City will be at the sole discretion of the adviser. Where possible, transactions with broker/dealers shall be selected on a competitive basis and their bid or offering prices shall be recorded. If there is no other readily available competitive offering, best efforts will be made to document quotations for comparable or alternative securities. When purchasing original issue instrumentality securities, no competitive offerings will be required as all dealers in the selling group offer those securities at the same original issue price.

11. COMPETITIVE BIDDING

It will be the policy of the City to transact all securities purchases and sales through a formal and competitive process requiring the solicitation and evaluation of at least three (3) bids/offers whenever possible. The City will accept the offer, which provides (a) the highest rate of return; and (b) optimizes the investment objectives of the overall portfolio. On transactions where three bids/offers are not available, the Chief Investment Officer or designee shall make an evaluation regarding the relative attractiveness of various offer using factors such as maturity date, credit ratings, structure, and other factors which influence pricing. It will be the responsibility of the City's staff involved to produce and retain written records (including the name of the financial institutions solicited, price/rate quoted, description of the security, bid/offer selected, and any special considerations that had an impact on their decision).

12. PURCHASE AND SALE OF SECURITIES

Unless the services of an external investment adviser are used, purchases and sales of securities will be executed only by the Chief Investment Officer and in their absence the Deputy City Treasurer. All transactions will be reviewed and approved by the City Treasurer or their designee.

13. POLICY REVIEW

The City Treasurer shall annually render to the City Council an investment policy statement, which shall be considered at a public meeting. Any changes in the policy shall also be considered by the City Council at a public meeting.

14. DIVERSIFICATION

The City will diversify use of investment instructions to avoid unreasonable risks inherent in over-investing in specific instruments, individual financial institutions, or maturities. Market price volatility shall be controlled through maturity diversification as well as ensuring adequate liquidity is available to meet cash flow requirements, thereby precluding the need to sell instruments at a market loss.

15. MAXIMUM MATURITIES

In accordance with California Government Code Section 53601, the City will not invest in any securities maturing more than five (5) years from the settlement date of purchase. If there is a desire to make investments longer than five (5) years, express authority to make those investments (either specifically or as part of an investment program) must be approved by the City Council no less than three (3) months prior to the investment.

16. TABLE OF AUTHORIZED INVESTMENTS

INVESTMENT TYPE	MAXIMUM MATURITY	MAXIMUM SPECIFIED % OF PORTFOLIO MARKET VALUE	MINIMUM QUALITY REQUIREMENTS	CA GOVERNMENT CODE SECTIONS
U.S. Treasury Obligations	5 years	None	None	53601(b)
U.S. Agency Obligations	5 years	None, but no more than 20% in any one issuer	None	53601(f)
Municipal Securities of the City, State of California or any local agency within the State of California	5 years	30% and no more than 5% in any one issuer	"A" or equivalent by at least one NRSRO	53601 (c) 53601 (e)
Municipal Securities of any of the other 49 states in addition to California	5 years	30% and no more than 5% in any one issuer	"A" or equivalent by at least one NRSRO	53601 (d)
Bankers' Acceptances	180 days	40% and no more than 5% in any one single bank	Short-term debt rating "A-1" by at least one NRSRO, Long-term debt rating "A" by at least one NRSRO	53601(g)
Commercial Paper-Non Pooled Funds	270 days	15% and no more than 10% in any one issuer	Short-term debt rating "A-1" by at least one NRSRO, Long-term debt rating "A" by at least one NRSRO	53601(h)(2)(c)
Commercial Paper-Pooled Funds	270 days	15% and no more than 10% in any one issuer*	Short-term debt rating "A-1" by at least one NRSRO, Long-term debt rating "A" by at least one NRSRO	53635(a)(1)
Negotiable Certificates of Deposit	5 years	30% and no more than 5% in any one issuer	Short-term debt rating "A-1" by at least one NRSRO, Long-term debt rating "A" by at least one NRSRO	53601(i)
Repurchase Agreements	1 year	20%	Collateral rate shall be valued at 102% or greater of the value of the repurchase agreement	53601(j)(1)(2)
Local Agency Investment Fund (LAIF)	N/A	None	None	16429.1
Joint Powers Authority Pool	N/A	None	Multiple (listed in #8)	53601(p)
Time Deposits (Non-Negotiable Certificate of Deposit)	5 years	25%	None	53630 et seq.
Medium-Term Notes	5 years	30% and no more than 5% in any one issuer	"A" or equivalent by at least one NRSRO	53601(k)
Asset-Backed, Mortgage-Backed and Mortgage Pass-Through Securities	5 years	20% and no more than 5% in any one issuer	"AA" or equivalent by at least one NRSRO	53601(o)
Supranational Obligations	5 years	10%	"AA" or equivalent by at least one NRSRO	53601(q)
Mutual Funds	N/A	20% and no more than 10% of total portfolio in any one mutual fund	Attain highest ranking by at least two NRSROs or have retained a registered investment advisor	53601(l) and 53601.6(b)
Money Market Mutual Funds	N/A	20% and no more than 20% of total portfolio in any one money market mutual fund	Attain highest ranking by at least two NRSROs or have retained a registered investment advisor	53601(l) and 53601.6(b)

* An additional fifteen percent (15%) or a total of thirty percent (30%) of the City's total portfolio market value may be invested in Commercial Paper under a provision sunseting on January 1, 2026.

17. DESCRIPTION OF AUTHORIZED INVESTMENTS

A. The City's Investment Portfolio is governed by California Government Code Section 53600 *et seq.* In the event a discrepancy is found between this policy and Code, the more restrictive parameters will take precedence. Percentage holding limits and minimum credit requirements listed in this section apply at the time the security is purchased. Within the context of these limitations, the following investments are authorized, as further limited herein:

- 1) United States Treasury Bills, Notes, and Bonds or those securities for which the full faith and credit of the United States are pledged for payment of principal and interest. There is no limitation as to the percentage of the portfolio which can be invested in this category. The maximum maturity may not exceed five (5) years.
- 2) Obligations (including U.S. Government Agency Mortgage pass-through securities) issued by various agencies of the Federal Government including but not limited to the Federal Farm Credit Bank System ("FFCB"), Federal Home Loan Bank ("FHLB"), Federal National Mortgage Association ("FNMA"), Federal Home Loan Mortgage Corporation ("FHLMC"), and such agencies or enterprises which may be created. There is no percentage limitation on the dollar amount which can be invested in Agency issues in total, but no more than twenty percent (20%) of the total market value of the portfolio may be invested in the securities of any one issuer. The maximum maturity may not exceed five (5) years. In addition, no more than twenty percent (20%) of the total market value of the portfolio may be invested in callable Agency securities.
- 3) Municipal Securities including obligations of the City, the State of California and any local agency within the State of California having a rating of "A" or equivalent or better by at least one NRSRO. Purchases may not exceed more than thirty percent (30%) of the total market value of the portfolio and individual issuers may not exceed five percent (5%) of the total market value of the portfolio. The maximum maturity is five (5) years.
- 4) Municipal Securities (registered Treasury notes or bonds) of any of the other 49 states in addition to California, including bonds payable solely out of the revenues from a revenue-producing property owned, controlled, or operated by a state or by a department, board, agency, or authority of any of the other 49 states, in addition to California, having a rating of "A" or equivalent or better by at least one NRSRO. Purchases may not exceed more than thirty percent (30%) of the total market value of the portfolio and individual issuers may not exceed five percent (5%) of the total market value of the portfolio. The maximum maturity is five (5) years.
- 5) Bills of Exchange or Time Drafts drawn on and accepted by a commercial bank, commonly known as Banker's Acceptances. Bankers' acceptances may not exceed one hundred eighty (180) days to maturity. To be eligible for purchase, banker's

acceptances must have short-term debt obligations rated “A-1” or its equivalent or better by at least one nationally recognized statistical rating organization (“NRSRO”); or long-term debt obligations which are rated in a rating category of “A” or its equivalent or better by at least one NRSRO. No more than forty percent (40%) of the total market value of the portfolio may be invested in bankers’ acceptances, and no more than five percent (5%) of the total market value of the portfolio may be invested in banker’s acceptances of any single bank.

- 6) Commercial Paper rated “A-1” or its equivalent by at least two (2) NRSROs and issued by a domestic corporation having assets in excess of five hundred million dollars (\$500,000,000) and having at least an “A” or its equivalent rating on its long-term debentures as provided by a NRSRO. Purchases of eligible commercial paper may not exceed two hundred seventy (270) days maturity nor represent more than ten percent (10%) of the outstanding paper on an issuing corporation. Purchases of commercial paper may not exceed fifteen percent (15%) of the total market value of the portfolio, which may be invested pursuant to this section. An additional fifteen percent (15%) or a total of thirty percent (30%) of the City’s total portfolio market value may be invested in Commercial Paper under a provision sunsetting on January 1, 2026. The additional fifteen percent (15%) may be so invested only if the dollar weighted average maturity of the entire amount does not exceed thirty-one (31) days.
- 7) Negotiable Certificates of Deposit (NCDs) issued by a nationally or State chartered bank or a State or Federal savings institution, or a State licensed branch of a foreign bank (“Yankee”). Purchases of negotiable certificates of deposit may not exceed thirty percent (30%) of the total market value of the portfolio. The amount of the NCD insured up to the FDIC limit does not require any credit ratings. Any amount above the FDIC limit must be issued by institutions which have short-term debt obligations rated “A-1” or better or its equivalent by at least two (2) NRSROs. No more than five percent (5%) of the total market value of the portfolio may be invested in any single issuer. The maximum maturity may not exceed five (5) years.
- 8) Repurchase Agreements – The City may invest in repurchase agreements with primary dealers of the Federal Reserve Bank of New York with which the City has entered into a Public Securities Association master repurchase agreement (“Master Repurchase Agreement”). The maturity of Repurchase Agreements shall not exceed one (1) year. The market value of securities used as collateral for Repurchase Agreements shall be valued at no less than one hundred two percent (102%) of the value of the Repurchase Agreement. Collateral pricing will be monitored no less than monthly by the investment staff and not be allowed to fall below one hundred two percent (102%) of the value of the Repurchase Agreement. In order to conform to provisions of the Federal Bankruptcy Code which provide for the liquidation of securities held as collateral for Repurchase Agreements, the only securities acceptable to the City as collateral shall be securities that are direct obligations of (or that are fully guaranteed as to principal and interest) by the United

- States or any agency thereof. Investments in repurchase agreements may not exceed twenty percent (20%) of the total market value of the portfolio.
- 9) Local Agency Investment Fund - The City may invest in the Local Agency Investment Fund ("LAIF") established by the State Treasurer for the benefit of local agencies up to the maximum permitted under California Government Code Section 16429.1.
 - 10) Joint Powers Authority Pool - The City may invest in shares of beneficial interest issued by a joint powers authority organized pursuant to California Government Code Section 6509.7 that invests in the securities and obligations authorized under California Government Code Section 53601. Each share shall represent an equal proportional interest in the underlying pool of securities owned by the joint powers authority. To be eligible, the joint powers authority issuing the shares must have retained an investment advisor that is registered or exempt from registration with the Securities and Exchange Commission, have not less than five (5) years of experience in investing in the securities and obligations authorized under California Government Code Section 53601, and have assets under management in excess of five hundred million dollars (\$500,000,000).
 - 11) Time Deposits (Non-Negotiable Certificates of Deposit) – The City may invest in non-negotiable time deposits collateralized in accordance with the California Government Code, which meet the requirements for investment in negotiable certificates of deposit. The City may invest in insured certificates of deposit with individual depository institutions up to the insured limit. No more than twenty-five percent (25%) of the total market value of the portfolio may be invested in this category. The maximum maturity may not exceed five (5) years.
 - 12) Medium-Term Notes of a maximum of five (5) years maturity issued by corporations organized and operating within the United States or by depository institutions licensed by the United States or any State and operating within the United States. The issuing corporation must have a minimum rating of "A" or its equivalent by at least one NRSRO. Purchases of medium-term notes may not exceed thirty percent (30%) of the total market value of the portfolio. No more than five percent (5%) of the total market value of the portfolio may be invested in any one corporate issuer.
 - 13) Asset-Backed, Mortgage-Backed, Mortgage Pass-Through Securities, and Collateralized Mortgage Obligations from issuers not defined in Section 2 of the Authorized Investments section of this policy are eligible for investment provided that the securities are rated in a category of "AA" or its equivalent or better by a NRSRO and have a maximum remaining maturity of five (5) years or less. Purchases of securities authorized by this subdivision may not exceed twenty percent (20%) of the total market value of the portfolio. No more than five percent (5%) of the total market value of the portfolio may be invested in any single issuer.
 - 14) Supranational Obligations - United States dollar denominated senior unsecured unsubordinated obligations issued or unconditionally guaranteed by the

International Bank for Reconstruction and Development, International Finance Corporation, or Inter-American Development Bank with a maximum remaining maturity of five (5) years or less; and eligible for purchase and sale within the United States. Investments under this subdivision shall be rated "AA" or better by an NRSRO and shall not exceed ten percent (10%) of the City's total portfolio market value.

15) Mutual Funds and Money Market Mutual Funds that are registered with the Securities and Exchange Commission under the Investment Company Act of 1940, provided that:

a) **Mutual Funds** that invest in the securities and obligations as authorized under California Government Code Section 53601 (a) to (k) and (m) to (q) inclusive and that meet either of the following criteria:

- i. Attained the highest ranking or the highest letter and numerical rating provided by not less than two (2) NRSROs; or
- ii. Have retained an investment adviser registered or exempt from registration with the Securities and Exchange Commission with not less than five (5) years' experience investing in the securities and obligations authorized by California Government Code Section 53601 and with assets under management in excess of five hundred million dollars (\$500,000,000).
- iii. No more than ten percent (10%) of the total portfolio market value may be invested in shares of any one mutual fund.

b) **Money Market Mutual Funds** registered with the Securities and Exchange Commission under the Investment Company Act of 1940 and issued by diversified management companies and meet either of the following criteria:

- i. Have attained the highest ranking or the highest letter and numerical rating provided by not less than two (2) NRSROs; or
- ii. Have retained an investment adviser registered or exempt from registration with the Securities and Exchange Commission with not less than five (5) years' experience managing money market mutual funds with assets under management in excess of five hundred million dollars (\$500,000,000).
- iii. No more than twenty percent (20%) of the total portfolio market value may be invested in the shares of any one Money Market Mutual Fund.

c) No more than twenty percent (20%) of the total portfolio market value may be invested in these securities.

B. In the event of a rating downgrade of security in the City's portfolio by any of the applicable rating agencies to a rating category below the minimum required for purchase, the Chief Investment Officer or designee will document such downgrade in writing. The Chief Investment Officer or designee will also communicate to the City Treasurer a recommended course of action for said security.

18. INVESTMENT POOLS/MUTUAL FUNDS

The City shall conduct a thorough investigation of any pool or mutual fund prior to making an investment, and on a continual basis thereafter. The Treasurer or their designee shall develop a questionnaire which will answer the following general questions:

- A description of eligible investment securities, and a written statement of investment policy and objectives.
- A description of interest calculations and how it is distributed, and how gains and losses are treated.
- A description of how the securities is safeguarded (including the settlement processes), and how often the securities are priced and the program audited.
- A description of who may invest in the program, how often, what size deposit and withdrawal are allowed.
- A schedule for receiving statements and portfolio listings.
- A description of how the pool/fund utilizes reserves, retained earnings, etc.
- A fee schedule, including when and how it is assessed.
- The eligibility of the pool/fund to invest in bond proceeds and special district funds, and a description of its practices.

19. COLLATERALIZATION

Certificates of Deposit ("CD"). The City shall require any commercial bank or savings and loan association to deposit eligible securities with an agency of a depository approved by the State Banking Department to secure any uninsured portion of a Non-Negotiable CD. The value of eligible securities as defined pursuant to California Government Code Section 53651, pledged against a CD shall be equal to one hundred fifty percent (150%) of the face value of the CD if the securities are classified as mortgages and one hundred ten percent (110%) of the face value of the CD for all other classes of security.

Collateralization of Bank Deposits. This is the process by which a bank or financial institution pledges securities, or other deposits for the purpose of securing repayment of deposited funds. The City shall require any bank or financial institution to comply with the collateralization criteria defined in California Government Code Section 53651.

Repurchase Agreements. The City requires that Repurchase Agreements be collateralized only by securities authorized in accordance with California Government Code:

1. The securities which collateralize the repurchase agreement shall be priced at Market Value, including any Accrued Interest plus a margin. The Market Value of the securities that underlie a repurchase agreement shall be valued at one hundred two percent (102%) or greater of the funds borrowed against those securities.
2. Financial institutions shall mark the value of the collateral to market at least monthly and increase or decrease the collateral to satisfy the ratio requirement described above.
3. The City shall receive monthly statements of collateral.

20. PROHIBITED INVESTMENTS

- Investments not described herein are prohibited for purchase in the City's portfolio.
- In accordance with Government Code, Section 53601.6, investment in inverse floaters, range notes, or mortgage derived interest-only strips is prohibited.
- Investment in any security that could result in a zero interest accrual if held to maturity is prohibited. Under a provision sunseting on January 1, 2026, securities backed by the U.S. Government that could result in a zero- or negative-interest accrual if held to maturity are permitted.
- Trading securities for the sole purpose of speculating on the future direction of interest rates is prohibited.
- Purchasing or selling securities on margin is prohibited.
- The use of reverse repurchase agreements, securities lending or any other form of borrowing or leverage is prohibited.
- The purchase of foreign currency denominated securities is prohibited.
- The purchase of a security with a forward settlement date exceeding 45 days from the time of the investment is prohibited.

21. REVIEW OF THE INVESTMENT PORTFOLIO

The City Treasurer shall periodically, but no less than quarterly, review the portfolio to identify investments that do not comply with this investment policy and establish protocols for reporting major and critical incidences of noncompliance to the City Manager, the Internal Auditor, and the City Council.

22. GLOSSARY OF INVESTMENT TERMS

Agencies. Shorthand market terminology for any obligation issued by a government-sponsored entity (“GSE”), or a federally related institution. Most obligations of GSEs are not guaranteed by the full faith and credit of the US government. Examples are:

The Federal Farm Credit Bank System (“FFCB”) provides credit and liquidity in the agricultural industry. FFCB issues discount notes and bonds.

The Federal Home Loan Bank (“FHLB”) provides credit and liquidity in the housing market. FHLB issues discount notes and bonds.

The Federal Home Loan Mortgage Corporation (“FHLMC”) provides credit and liquidity in the housing market. FHLMC (also known as “FreddieMac”) issues discount notes, bonds, and mortgage pass-through securities.

The Federal National Mortgage Association (“FNMA”) was established to provide credit and liquidity in the housing market. FNMA (also known as “FannieMae”) issues discount notes, bonds, and mortgage pass-through securities.

The Government National Mortgage Association (“GNMA”) (also known as “GinnieMae”) issues mortgage pass-through securities, which are guaranteed by the full faith and credit of the U.S. Government.

Asset Backed Securities. Securities supported by pools of installment loans or leases or by pools of revolving lines of credit.

Banker’s Acceptance. A money market instrument created to facilitate international trade transactions. It is highly liquid and safe because the risk of the trade transaction is transferred to the bank which “accepts” the obligation to pay the investor.

Basis Point. One one-hundredth of a percent (i.e., 0.01%).

Benchmark. A comparison security or portfolio. A performance benchmark is a partial market index, which reflects the mix of securities allowed under a specific investment policy.

Bond Equivalent Yield. The basis on which yields on notes and bonds are quoted.

Book Value (Cost Value). The purchase price of the security as recorded on the City’s books.

Broker. A broker brings buyers and sellers together for a transaction for which the broker receives a commission. A broker does not sell securities from their own position.

California Debt and Investment Advisory Commission (“CDIAC”). CDIAC provides information, education, and technical assistance on debt issuance and public fund

investments to local public agencies and other public finance professionals. CDIAC was created in 1981 with the passage of Chapter 1088, Statutes of 1981 (Assembly Bill (“AB”) 1192). This legislation established the California Debt Advisory Commission as the State's clearinghouse for public debt issuance information and required it to assist state and local agencies with the monitoring, issuance, and management of public debt.

Callable. A callable security gives the issuer the option to call/redeem it from the investor prior to its maturity. The main cause of a call is a decline in interest rates. If interest rates decline, the issuer will likely call its current securities and reissue them at a lower rate of interest.

Certificate of Deposit (“CD”). A time deposit with a specific maturity evidenced by a certificate.

Collateral. Securities or cash pledged by a borrower to secure repayment of a loan or repurchase agreement. Also, securities pledged by a financial institution to secure deposits of public monies.

Collateralized Bank Deposit. A bank deposit that is collateralized at least one hundred percent (100%) (principal plus interest to maturity). The deposit is collateralized using assets set aside by the issuer such as Treasury securities or other qualified collateral to secure the deposit in excess of the limit covered by the Federal Deposit Insurance Corporation.

Collateralized Mortgage Obligations (“CMO”). Classes of bonds that redistribute the cash flows of mortgage securities (and whole loans) to create securities that have different levels of prepayment risk, as compared to the underlying mortgage securities.

Collateralized Time Deposit. Time deposits that are collateralized at least one hundred percent (100%) (principal plus interest to maturity). These instruments are collateralized using assets set aside by the issuer such as Treasury securities or other qualified collateral to secure the deposit in excess of the limit covered by the Federal Deposit Insurance Corporation.

Commercial Paper. The short-term unsecured debt of corporations.

Corporate Medium Term Note. A security issued by a corporation doing business in the U.S. with a maturity not to exceed five (5) years.

Cost Value (Book Value). The purchase price of the security as recorded on the City's books.

Coupon. The rate of return at which interest is paid on a bond.

Credit Risk. The risk that principal and/or interest on an investment will not be paid in a timely manner due to changes in the condition of the issuer.

Dealer. A dealer acts as a principal in security transactions, selling securities from and buying securities for his own position.

Debenture. A bond secured only by the general credit of the issuer.

Delivery vs. Payment (“DVP”). A securities industry procedure whereby payment for a security must be made at the time the security is delivered to the purchaser’s agent.

Derivative. Any security that has principal and/or interest payments which are subject to uncertainty (but not for reasons of default or credit risk) as to timing and/or amount, or any security which represents a component of another security which has been separated from other components (“Stripped” coupons and principal). A derivative is also defined as a financial instrument the value of which is totally or partially derived from the value of another instrument, interest rate, or index.

Discount. The difference between the par value of a bond and the cost of the bond, when the cost is below par. Some short-term securities, such as Treasury bills and banker’s acceptances, are known as discount securities. They sell at a discount from par and return the par value to the investor at maturity without additional interest. Other securities, which have fixed coupons, trade at a discount when the coupon rate is lower than the current market rate for securities of that maturity and/or quality.

Diversification. Dividing investment funds among a variety of investments to avoid excessive exposure to any one source of risk.

Duration. The weighted average time to maturity of a bond where the weights are the present values of the future cash flows. Duration measures the price sensitivity of a security to changes interest rates.

Federal Deposit Insurance Corporation (“FDIC”). The FDIC is an independent Federal agency insuring deposits in U.S. banks and thrifts in the event of bank failures. The FDIC was created in 1933 to maintain public confidence and encourage stability in the financial system through the promotion of sound banking practices.

Federal Open Market Committee (“FOMC”). Consists of seven members of the Federal Reserve Board and five (5) of the twelve (12) Federal Reserve Bank Presidents. The President of the New York Federal Reserve Bank is a permanent member, while the other presidents serve on a rotating basis. The Committee periodically meets to set Federal Reserve guidelines regarding purchases and sales of Government Securities in the open market as a means of influencing the volume of the bank credit and money.

Federally Insured Time Deposit. A time deposit is an interest-bearing bank deposit account that has a specified date of maturity, such as a certificate of deposit (“CD”). These deposits are limited to funds insured in accordance with FDIC insurance deposit limits.

Fiscal Agent. A financial institution which performs payment of principal and interest to bondholders, and certain administrative duties on the bond issuer’s behalf.

Liquidity. The speed and ease with which an asset can be converted to cash.

Local Agency Investment Fund (“LAIF”). A voluntary investment fund open to government entities and certain non-profit organizations in California that is managed by the State Treasurer’s Office.

Local Agency Investment Guidelines (“LAIG”). Published by CDIAC, these guidelines are intended to aid local officials in their efforts to implement existing laws pertaining to the investment of public funds. Each year, CDIAC staff convenes a working group of public- and private-sector professionals to support its efforts to revise and update these guidelines.

Local Government Investment Pool. Investment pools that range from the State Treasurer’s Office Local Agency Investment Fund (“LAIF”) to county pools, to Joint Powers Authorities (“JPAs”). These funds are not subject to the same Security Exchange Commission (“SEC”) rules applicable to money market mutual funds.

Make Whole Call. A type of call provision on a bond that allows the issuer to pay off the remaining debt early. Unlike a call option, with a make whole call provision, the issuer makes a lump sum payment that equals the net present value (“NPV”) of future coupon payments that will not be paid because of the call. With this type of call, an investor is compensated or “made whole”.

Margin. The difference between the market value of a security and the loan a broker makes using that security as collateral.

Market Risk. The risk that the value of securities will fluctuate with changes in overall market conditions or interest rates.

Market Value. The price at which a security can be traded.

Master Repurchase Agreement. A written contract covering all future transactions between the parties to repurchase-reverse repurchases agreements that establishes each party’s rights in the transactions. A master agreement will often specify, among other things, the right of the buyer-lender to liquidate the underlying securities in the event of default by the seller borrower.

Maturity. The final date upon which the principal of a security becomes due and payable. An investment’s term or remaining maturity is measured from the settlement date to final maturity.

Medium Term Notes (“MTN”). Unsecured, investment-grade senior debt securities of major corporations which are sold in relatively small amounts on either a continuous or an intermittent basis. MTNs are highly flexible debt instruments that can be structured to respond to market opportunities or to investor preferences.

Modified Duration. The percent change in price for a one hundred (100) basis point change in yields. Modified duration is the best single measure of a portfolio’s or security’s exposure to market risk.

Money Market. The market in which short-term debt instruments (Treasury bills, discount notes, commercial paper, and banker’s acceptances) are issued and traded.

Money Market Mutual Fund. A mutual fund that invests exclusively in short-term securities. Examples of investments in money market funds are certificates of deposit and U.S. Treasury securities. Money market funds attempt to keep their net asset values at one dollar (\$1) per share.

Mortgage Pass-Through Securities. A securitized participation in the interest and principal cash flows from a specified pool of mortgages. Principal and interest payments made on the mortgages are passed through to the holder of the security.

Municipal Securities. Securities issued by state and local agencies to finance capital and operating expenses.

Mutual Fund. An entity which pools the funds of investors and invests those funds in a set of securities which is specifically defined in the fund’s prospectus. Mutual funds can be invested in various types of domestic and/or international stocks, bonds, and money market instruments, as set forth in the individual fund’s prospectus. For most large, institutional investors, the costs associated with investing in mutual funds are higher than the investor can obtain through an individually managed portfolio.

Nationally Recognized Statistical Rating Organization (“NRSRO”). A credit rating agency that the Securities and Exchange Commission in the United States uses for regulatory purposes. Credit rating agencies provide assessments of an investment’s risk. The issuers of investments, especially debt securities, pay credit rating agencies to provide them with ratings. The three most prominent NRSROs are Fitch, Standard and Poor, and Moody’s.

Negotiable Certificate of Deposit (“CD”). A short-term debt instrument that pays interest and is issued by a bank, savings or federal association, state or federal credit union, or state-licensed branch of a foreign bank. Negotiable CDs are traded in a secondary market and are payable upon order to the bearer or initial depositor (investor).

Paper Gain Or Loss. Term used for unrealized gain or loss on securities being held in a portfolio based on comparison of current market quotes and their original cost. This

situation exists as long as the security is held while there is a difference between cost value (book value) and the market value.

Portfolio. Collection of securities held by an investor.

Primary Dealer. A financial institution (1) that is a trading counterparty with the Federal Reserve in its execution of market operations to carry out U.S. monetary policy, and (2) that participates for statistical reporting purposes in compiling data on activity in the U.S. Government securities market.

Prudent Person (Prudent Investor) Rule. A standard of responsibility which applies to fiduciaries. In California, the rule is stated as “Investments shall be managed with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person (acting in a like capacity and familiar with such matters) would use in the conduct of an enterprise of like character and with like aims to accomplish similar purposes.

Rate of Return. The yield obtainable on a security based on its purchase price or its current market price. This may be the amortized yield to maturity on a bond, the current income return.

Repurchase Agreement (“Repo”). Short-term purchases of securities with a simultaneous agreement to sell the securities back at a higher price. From the seller’s point of view, the same transaction is a reverse repurchase agreement.

Reverse Repurchase Agreement (“Reverse Repo”). A Reverse Repo agreement involves an investor borrowing cash from a financial institution in exchange for securities. This investor agrees to repurchase the securities at a specific date for the same cash value plus an agreed upon interest rate. Although the transaction is similar to Repo, the purpose of entering into a Reverse Repo is quite different. While a Repo is straightforward investment of public funds, the Reverse Repo is a borrowing.

Safekeeping. A service to bank customers whereby securities are held by the bank in the customer’s name.

Securities and Exchange Commission (“SEC”). The SEC is an independent Federal government agency responsible for protecting investors, maintaining fair and orderly functioning of securities markets and facilitating capital formation. It was created by Congress in 1934 as the first Federal regulator of securities markets. The SEC promotes full public disclosure, protects investors against fraudulent and manipulative practices in the market, and monitors corporate takeover actions in the United States.

SEC Rule 15c3-1. An SEC rule setting capital requirements for brokers and dealers. Under SEC Rule 15c3-1, a broker or dealer must have sufficient liquidity in order to cover the most pressing obligations. This is defined as having a certain amount of liquidity as a percentage of the broker/dealer’s total obligations. If the percentage falls below a certain

point, the broker or dealer may not be allowed to take on new clients and may have restrictions placed on dealings with current client.

Spread. The yield or price difference between the bid and offer on an issue, or the yield or price difference between different issues.

Structured Note. A complex, fixed income instrument, which pays interest, based on a formula tied to other interest rates, commodities or indices. Examples include inverse floating rate notes which have coupons that increase when other interest rates are falling and which fall when other interest rates are rising; and "dual index floaters" which pay interest based on the relationship between two other interest rates (for example, the yield on the ten (10) year Treasury note minus the Libor rate. Issuers of such notes lock in a reduced cost of borrowing by purchasing interest rate swap agreements.

Supranational. A Supranational is a multi-national organization whereby member states transcend national boundaries or interests to share in the decision making to promote economic development in the member countries. There are three supranational institutions that issue obligations that are eligible investments for California local agencies: the International Bank of Reconstruction and Development ("IBRD"), International Finance Corporation ("IFC"), and Inter-American Development Bank ("IADB").

Swap. The sale of one issue and the simultaneous purchase of another for some perceived advantage.

Total Rate of Return. A measure of a portfolio's performance over time. It is the internal rate of return, which equates the beginning value of the portfolio with the ending value; it includes interest earnings, realized and unrealized gains, and losses in the portfolio.

Treasury Bills. All securities issued with initial maturities of one year or less are issued as discounted instruments and are called Treasury bills. The Treasury currently issues three (3) and six (6) month Treasury bills at regular weekly auctions. It also issues "cash management" bills as needed to smooth out cash flows.

Treasury Bonds. All securities issued with initial maturities greater than ten years are called Treasury bonds. Like Treasury notes, they pay interest semi-annually.

Treasury Notes. All securities issued with initial maturities of two (2) to ten (10) years are called Treasury notes and pay interest semi-annually.

Trustee. A financial institution with trust powers that acts in a fiduciary capacity for the benefit of the bondholders in enforcing the terms of the bond contract.

U.S. Treasury Obligations. Securities issued by the U.S. Treasury and backed by the full faith and credit of the United States. Treasuries are considered to have no credit risk and

are the benchmark for interest rates on all other securities in the U.S. and overseas. The Treasury issues both discounted securities and fixed coupon notes and bonds.

Yield Curve. Yield calculations of various maturities at a given time to observe spread difference.

Yield to Maturity. The annualized internal rate of return on an investment which equates the expected cash flows from the investment to its cost.

APPENDIX A – LIST OF RESOLUTIONS FOR INVESTMENT OF INACTIVE FUNDS IN LAIF

<u>Resolution Number</u>	<u>City Council Approval Date</u>
2024-202	December 3, 2024
2023-158	December 5, 2023
2022-157	December 6, 2022
2021-164	November 2, 2021
2020-171	October 20, 2020
2020-128	July 21, 2020
2019-090	July 2, 2019
2019-008	February 19, 2019
2018-154	November 20, 2018

APPENDIX B – LIST OF RESOLUTIONS FOR INVESTMENT OF CITY FUNDS

<u>Resolution Number</u>	<u>City Council Approval Date</u>
2024-203	December 3, 2024
2023-159	December 5, 2023
2022-158	December 6, 2022
2021-165	November 2, 2021
2020-172	October 20, 2020
2020-129	July 21, 2020
2019-091	July 2, 2019
2019-009	February 19, 2019
2018-155	November 20, 2018