University of Alaska & University of Alaska Foundation
Consolidated Endowment Fund Investment Policy

(Represents Redline Draft for June 2012 through 10-30-2013)

I.  INTRODUCTION AND PURPOSE

The University of Alaska and University of Alaska Foundation Consolidated Endowment Fund (the “Fund”) was established effective July 1, 1997 in order to enhance the management of the University of Alaska’s Land Grant Endowment Trust Fund held by the Board of Regents and the Pooled Endowment Funds held by the University of Alaska Foundation (the “Foundation”). The Fund is maintained and operated by the Foundation pursuant to the Consolidated Endowment Fund Agreement, by and between the University of Alaska Board of Regents (the “BOR”), the University of Alaska (the “University”) and the University of Alaska Foundation Board of Trustees (the “BOT”). This Investment Policy (this “Policy”) establishes an investment framework that reflects the investment management philosophy of both the BOR and BOT (collectively the “Boards”), thereby providing the University of Alaska Foundation Investment Committee (the “Committee”) with a guide for investment of the Fund. The Fund consists of the investable resources of the University Land Grant Endowment Trust Fund, its related Inflation-Proofing Fund, the Foundation’s Pooled Endowment Fund, and such other funds as the University’s Chief Finance Officer or Foundation’s Treasurer (the “Treasurer”) invests in the Fund.

II.  SCOPE OF THIS POLICY

This Policy governs the investment activities of all assets owned or managed within the Fund. It is intended to be interpreted liberally so that the investment strategies employed can be accomplished effectively and efficiently.

III. DUTY OF LOYALTY AND STANDARDS OF CARE

The Boards, the Committee, the Treasurer, and others serving in a fiduciary capacity for the Fund are subject to compliance with AS 13.7065.010 – 13.7065.095 and AS 37.10.071. As such, the prudent investor (expert) standard applies to all fiduciary activities and each fiduciary shall exercise his or her fiduciary duties in the sole financial best interests of the Fund and treat all beneficiaries with impartiality. For all other matters related to the Fund, the prudent person standard shall apply to the Boards, Committee, Treasurer and University and Foundation staff.
IV. PRINCIPLES AND CONSIDERATIONS FOR FUND MANAGEMENT AND INVESTMENT

The Primary Investment Goal of the Fund is to provide a real rate of return (total return minus, net of investment expenses, sufficient to cover the endowment administrative fees and inflation) sufficient to the annual spending allowances in support of the purposes of the various endowments that make up the Fund, in perpetuity.

The greatest investment risk for the Fund is the probability of not meeting its Primary Investment Goal. Therefore, in order to minimize this risk the Committee will consider in all aspects of its investment decision-making process (1) the probability of missing the objective and (2) the asset allocation, which is the primary determinant of long-term performance. Achievement of the Primary Investment Goal and management of funds will be driven by the core principles and considerations listed below.

Charitable Purpose: Endowment management and investment decisions shall be made with consideration to the purposes of the institution and the participating fund(s), and the documented donor intent.

Distributions (Spending Allowances): Distributions from the endowment funds shall be made in accordance with spending policies and procedures as may be adopted for the particular endowment or class of endowments directed by the responsible Board. In making such distributions and managing endowments the responsible board, committees, and staff shall consider the duration and preservation of the fund, the purposes of the institution and the fund, the general economic conditions including inflation and deflation, the expected total return, other resources of the institution, and the applicable investment policies.

Diversification: The likelihood of realization of the Primary Investment Goal is enhanced substantially through diversification and the reduction of risk; therefore, the Committee will diversify assets among various classes of investments and managers.

Fees and Expenses: Fees and expenses may cause a significant drag on returns and appreciation, which can limit the Boards’ ability to attain the Primary Investment Goal; therefore, the Committee will monitor fees and expenses associated with investment activities on an annual basis and incur only costs that are appropriate and reasonable.

Inflation: The Consumer Price Index (CPI-U) shall be used as the basis for determining the real rate of return and attainment of the Primary Investment Goal.

Liquidity: The Fund has relatively modest cash outflow requirements; therefore, excessive amounts of liquidity are not required and modest appropriate portions of the Fund may be invested in non-liquid investments.
Time Horizon: The Fund has an infinite life; therefore, investment strategies may take a long-term perspective.

Total Return: The Boards have adopted a “Total Return” approach to managing endowments, unless otherwise directed by the donor; therefore, the Committee will manage the Fund’s investments without regard to the distinction between current income and net realized or unrealized gains and losses, and will emphasize returns net of fees when assessing overall performance of the Fund and recommending spending rates.

Verification of Facts: A reasonable effort shall be made to verify facts relevant to the management and investment of funds.

Volatility: The Primary Investment Goal can best be achieved by assuming acceptable risk levels commensurate with long-term market volatility; therefore, the Committee will measure and seek to limit the overall level of volatility to an acceptable level as it makes specific asset allocation decisions.

V. TARGET RATE OF RETURN

The Target Rate of Return represents the Committee’s reconciliation of, or bringing together, its long-term (10 to 20-year) estimates of: the Fund’s probable rate of return net of all expenses, the administrative endowment fee, the spending allowance, an inflation provision, and portfolio growth from earnings if any. The Target Rate of Return is intended to help coordinate the structuring of the investment portfolio and its asset allocation with the funding needs of the Foundation and the endowment beneficiaries. The Committee shall periodically review, no less frequently than annually, review and modify the Target Rate of Return as considered necessary by the Committee. In setting the Target Rate of Return, the Committee shall make a good faith effort to preserve intergenerational equity to the extent practicable by providing for a reasonable rate of inflation, the expected spending rate, administrative fees, and expenses charged to the Fund, as well as, any planned real portfolio growth from investment earnings. (See the Attachments to this Policy provision for the most recent assumptions regarding the Target Rate of Return.)

VI. TARGET ASSET ALLOCATION

A significant portion of a portfolio’s investment behavior can be attributed to the asset classes which are employed and the weighting of each asset class; therefore, a major responsibility of the Committee is the determination of the Target Asset Allocation.

The Committee shall identify the Target Asset Allocation that it believes offers a reasonable probability of achieving the Fund’s investment
objectives within a framework of commonly accepted risk factors and this policy. The Committee shall periodically consider capital market conditions, the universe of investment options, the current asset allocation, and recommend revisions to the Target Asset Allocation as it considers necessary.

The Treasurer shall conduct an Investment Guidelines and Philosophy Statement, which includes the asset allocation analysis for review by the Committee at least annually, as it may be amended from time to determine if modifications are appropriate. (See the Attachments to this Policy for the most recent target asset allocation.)

VII. ASSET ALLOCATION REBALANCING

The asset allocation shall be rebalanced regularly to minimize extraordinary deviations. The asset allocation To the extent practicable, the rebalancing shall be accomplished through investment of new contributions and, reinvestment of other cash flows to the extent practicable, and through or by such other means as directed by the Treasurer.

The Treasurer shall report, or cause to be reported, to the Committee each quarter any uncorrected variances from the Target Asset Allocations (those deviations that are outside of the pre-authorized asset allocation variance bands) and the plan to correct such deviations. The approved asset allocation variance band for each of the major asset allocation categories shall be 20% of the subject major asset allocation category or 3% of the total Fund, whichever is less.

VIII. PORTFOLIO PERFORMANCE BENCHMARKS

Performance of the Fund will be measured by several benchmarks in order to evaluate attainment of progress towards its Primary Investment Goal, the performance of the Fund relative to market conditions and its peers, and the impact of asset allocation and active management, as follows:

**Policy Benchmark 1:** Baseline performance at the compounded Target Rate of Return for rolling five year periods (Primary Investment Goal);

**Policy Benchmark 2:** Baseline performance of a Policy Benchmark Portfolio consisting of 80% Russell 3000 MSCI ACWI, 15% Lehman Barclays Aggregate, and 5% 3090-day Treasuries for the relevant periods; (This Benchmark provides a comparison of actual performance to a simple passively managed traditional portfolio at a risk level approved by the Boards);

**Policy Benchmark 3:** Baseline risk adjusted returns (Sharpe Ratios) for a Policy Benchmark Portfolio consisting of 80% Russell 3000 MSCI ACWI, 15%...
Lehman Barclays Aggregate, and 5% 3090-day T-Bills for the relevant periods; (This benchmark provides a risk adjusted comparison of the portfolio return to that of the model portfolio in Policy Benchmark 1.);

**Policy Benchmark 3:** Baseline performance equal to the Target Rate of Return for rolling five year periods (This benchmark monitors progress towards attainment of the Primary Investment Goal);

**Peer Benchmark 1:** Baseline performance of the Callan Cambridge Endowment-Foundation Universe or other appropriate peer group for the relevant periods; (This benchmark provides comparison to a broad group of peers.);

**Peer Benchmark 2:** Baseline risk adjusted returns (Sharpe Ratios) of the Callan Cambridge Endowment-Foundation Universe or other appropriate peer group for the relevant periods; (This benchmark provides a risk adjusted comparison to a broad group of peers.);

**Peer Benchmark 3:** Annual baseline performance of the compounded, equal weighted, average nominal return for endowment funds in the $100 to $500 million classification participating in the NACUBO - Commonfund Study of Endowments (NCSE) for the relevant periods; as reported annually (This benchmark provides an annual comparison to the largest industry specific endowment peer group.);

**Target Custom Benchmark 1:** Baseline performance of a weighted benchmark portfolio at the target asset allocation for relevant periods. (This benchmark provides a comparison to a passive portfolio at the target neutral weights.) and

**Custom Benchmark 2:** Baseline risk adjusted performance (Sharpe Ratios) of a weighted benchmark portfolio at the target strategic asset allocation for relevant periods (This benchmark provides a risk adjusted comparison to a passive portfolio at the target neutral weights.).

Although this Policy includes multiple benchmarks, each serves a specific purpose when compared to actual or to each other. For instance: a comparison of Policy Benchmark 1 to actual performance provides a rough measure of the effect of the strategic allocation and the implementation (manager selection plus tactical allocations); while a comparison of Policy Benchmark 1 to Custom Benchmark 1 provides a rough attribution measure of the value added by the strategic allocation or structure of the portfolio alone; and, a comparison of Custom Benchmark 1 to actual performance provides a rough attribution measurer of the value added by the Fund Manager through manager selection and tactical allocations.
IX. DELEGATION AND ASSIGNMENT OF DUTIES AND AUTHORITY

Effective and cohesive relationships between the Boards, the Committee, Treasurer and staff, other committees and external advisors, Fund Managers and investment managers are important to fulfilling the purposes of this Policy and the Fund. The major duties and responsibilities of the Committee and the Treasurer as determined by the Boards are assigned and delegated as presented herein. Authority to carry out duties delegated and assigned to the Committee and the Treasurer may be further delegated to professional managers, advisors and qualified members of the Foundation’s staff.

1. Responsibilities of the Boards:
   a. Maintaining the overall stewardship of the Fund in accordance with the Consolidated Endowment Fund Agreement, AS 13.7065.010 – 13.7065.095 and AS 37.10.071, as they may be amended or restated from time to time;
   b. Adopting the policies needed for the prudent investment and administration of the Fund;
   c. Delegating and assigning duties and authority to the Committee; and the Treasurer and other fiduciaries;
   d. Reviewing the performance of the Fund and activities of the Committee on a regular basis.

2. Committee Responsibilities:
   a. Ensuring that the assets of the Fund are managed in a manner that is consistent with the law and this Policy;
   b. Developing and making recommendations to the Boards regarding investment policies and objectives, spending rates and other related matters that support the purposes of the participating funds and endowments;
   c. Developing and approving an investment philosophy and guidelines for implementation of that philosophy;
   d. Directing engagement of and authorizing agreements for the engagement of Fund Manager(s), advisors and investment managers, and custodians engaged by the Committee;
   e. Approving Target Asset Allocations and related benchmarks consistent with meeting the objectives and risk tolerances described in this Policy;
   f. Approving the classes of investments that are acceptable investments for the CEF (See the attachments to this Policy);
f. Approving the level of commitments to future investments as considered appropriate by the Committee (See the attachments to this Policy);

g. Selecting and directing investment advisors;

h. Approving guidelines and procedures for selection and monitoring of investment managers (See and advisors engaged by the attachments to this Policy); Committee;

i. Approving the selection of managers;

j. Approving investment mandates and guidelines for separate account managers and performance benchmarks for all managers (See attachments to this Policy);

k. Reviewing and evaluating investment results and directing or recommending implementation of corrective action by the manager or relevant party as may be considered necessary by the Committee; appropriate;

l. Advising the Board of Trustees and other committees and the BOT regarding return expectations and spending allowance issues;

m. Making timely reports to the Boards regarding investment results, material events affecting the Fund, and Committee activities and actions;

n. Reviewing this Policy periodically and making recommendations for modifications to the Boards as may be considered necessary by the Committee;

3. Treasurer Responsibilities

a. Performing all duties necessary for the efficient administration of the Fund that have not been delegated or assigned to the Committee;

b. Conducting an annual due diligence review of the Fund Manager(s) and its operations, including manager due diligence procedures and independent reviews of selected managers with the assistance of the Fund Manager;

c. Executing directives of the Committee and actions authorized by this Policy;

d. Recommending Fund Manager, advisor— and investment manager and custodian selections and terminations for those directly engaged by the Committee;

e. Preparing or reviewing asset allocation analyses and recommending changes in allocations as appropriate;

f. Supporting the activities of the Committee and maintaining communications with and between the Committee, Fund Manager(s), advisors, investment managers, and custodians engaged directly by the Committee;
f. Timely evaluating and reporting to the Committee on manager and investment
   performance no less frequently than quarterly;

g. Annual evaluation and reporting on investment fees and costs to the Committee;

h. Reporting to the Committee any litigation or violations of applicable laws or
   regulations involving the Foundation, Fund Managers, advisors, or investment
   managers or custodians that come to the Treasurer’s attention;

i. Recording transactions in the Foundation’s financial system, reconciling investment
   statements with the Foundation’s financial records, and reporting investment activity
   on the Foundation’s financial statements;

j. Reviewing manager due diligence performed by the advisors and conducting
   independent due diligence reviews of selected managers as may be considered
   necessary by the Treasurer or the Committee;

k. Reviewing private placement memorandums, partnership agreements, and other
   documentation, and seeking legal or other advice as may be considered necessary
   by the Treasurer;

l. Executing and submitting subscription agreements, contracts, and redemption
   requests associated with new investments, partial or complete redemptions, and
   manager terminations for direct investments and contracts by the Committee;

m. Providing the current Policy and investment guidelines and mandates to
   the Fund Manager and investment managers engaged by the Committee;

n. Monitoring audit standards and regulations concerning the financial and tax
   reporting of investments and establishing procedures required to insure compliance
   with external reporting requirements;

o. Managing portfolio cash inflows and outflows and calls and distributions to
   provide liquidity and minimize holding of excessive cash for funds and investments
   not under the management of a Fund Manager;

p. Developing guidelines and procedures for manager selection and monitoring;

q. Executing account agreements with banks, investment managers and other
   entities engaged directly by the Committee; and

r. Assigning specific investments to classes or authorized categories of assets for
   asset allocation and performance evaluation purposes;

s. Taking any other actions not specified above as may be directed by the Committee
   or deemed necessary or desirable by the Treasurer for the efficient administration
   and protection of assets of the Fund.
4. **Advisor Responsibilities:**
   a. Recommending changes in investment strategy, asset allocation, and engagement of managers;
   b. Recommending revisions to investment policies, objectives, and guidelines;
   c. Providing background information on managers (including searches and due diligence reviews), asset classes, investment products and funds;
   d. Performing due diligence reviews periodically according to the advisor’s standard practices;
   e. Preparing performance evaluation reports quarterly;
   f. Attending Committee meetings, as requested, to present quarterly market analysis and performance reports;
   g. Preparing an analysis of manager and custodian fees and other investment costs upon request;
   h. Providing research on specific issues and opportunities, and assisting the Committee, Treasurer and staff with special projects;
   i. Advising the Committee and Treasurer on rebalancing decisions regarding the portfolio;
   j. Monitoring managers for adherence to mandates and guidelines and reporting to the Treasurer significant deviations that may come to the attention of the advisor;
   k. Notifying the Treasurer of any significant changes in personnel or ownership, litigation or violation of laws or regulations, or negative events regarding the advisor or a manager which may come to the attention of the advisor;
   l. Providing the Committee and the Treasurer the advisor’s capital market assumptions;
   m. Developing and recommending investment guidelines and benchmarks for specific managers and mandates;
   n. Assisting in the education of the Committee, the Treasurer and staff.

5. **Manager Responsibilities:**
   a. Executing their assigned investment mandates or strategies within the guidelines approved by the Committee;
   b. Providing written documentation of portfolio activity, portfolio valuations, performance data, reconciliation to custodian reports if applicable, and portfolio characteristics no less frequently than quarterly or as otherwise may be directed by the Committee or the Treasurer;
e. Voting proxies for the securities as may be directed by the Treasurer;

f. Providing the Treasurer annually with a copy of the manager's form ADV Part II and a copy of its annual report, SAS 70 report if applicable, audited financial statements, valuation procedures, and/or copies of updated prospectuses or offering memoranda as may be applicable;

g. Notifying the Treasurer immediately of any violations of applicable laws and regulations, litigation, key staff or ownership changes, or other material events;

h. Participating with the Treasurer and Committee in meetings, upon request, to address investment strategies, performance results and other matters of interest.

6. **Custodian Responsibilities:**

a. Providing timely reports detailing investment holdings and transactions monthly to the Treasurer and advisor;

b. Providing an annual summary report to the Treasurer and the advisor within 30 days following each fiscal year end, June 30 that includes the following:

   - Statement of all investments of the Fund held by the Custodian,
   - Statement of all assets received on behalf of the Fund,
   - Statement of all sales, redemptions, and principal payments,
   - Statement of all withdrawals from the portfolio,
   - Statement of all fees and expenses charged,
   - Statement of all purchases, and
   - Statement of all income;

c. Providing most recent SAS 70 report and such other reports as may be requested by the Committee, the Treasurer or the advisor;

d. Providing all customary custodial functions including, without limitation, security safekeeping, collection of income, settlement of trades, collection of proceeds of maturing securities, daily investment of cash, etc.

X. **PERFORMANCE EVALUATION OF ADVISORS: THE FUND MANAGER**

a. Advisors General investment performance reviews will be conducted by the Committee quarterly;

b. The Treasurer will report to the Committee the findings of his or her annual due diligence review of the Fund Manager; and
c. The Committee shall be reviewed periodically evaluate the Fund Manager’s general performance and service levels at least every two years based on the following criteria as considered applicable by the Committee, including:

   - Continuity of personnel and practices of the firm;
• Communications with the Committee,
• Perceived adherence Adherence to the philosophy and standards, which were articulated when retained;
• Perceived performance of Performance of investment manager due diligence and monitoring functions of the managers, including timeliness of reports and presentation style of investment activities,
• Perceived helpfulness Quality of the Fund Manager’s investment performance reporting,
• Helpfulness of the advice and other input to the Committee’s decision making process; and
• Assistance provided to staff in accomplishing their activities.

XI. PERFORMANCE EVALUATION OF MANAGERS

Each manager or investment fund will be reviewed quarterly based on the following as considered applicable by the Committee:

• The manager’s or fund’s return relative to the benchmark assigned by the Committee and relative to the manager’s or fund’s peer group (The evaluation shall consider returns on both an absolute and risk adjusted basis, if practicable);
• The advisor’s assessment of the manager’s conformance to its mandate or the strategy for which it was selected;
• The advisor’s assessment of the continuity and depth of the manager’s investment and risk management staff;
• The manager’s responsiveness to inquiries and requests for information and assistance by staff; and
• The Treasurer’s assessment of the manager’s fulfillment of the responsibilities identified in subsection IX.5 of this Policy.

XII. MANAGEMENT OF FUNDS

Alaska Preference: Preference shall be given to Alaska depositories, brokers and investment managers when all other considerations are equal.

Active vs. Passive Management: The Committee shall periodically review the advantages of passive relative to active investment management in the context of reduced management expenses, stable performance, and constant and complete exposure to the particular asset class relative to the expected excess return that may be provided by an individual manager.

Fiscal Year: The fiscal year for the Fund shall be July 1 through June 30.
Fund Manager: A manager of investment managers that has full or nearly full discretion in management of all or a major segment of the endowment portfolio and functions as an extension of the in-house investment staff.

Investment Committee or Committee: The Investment Committee as described in Section 5 of the Consolidated Endowment Fund Agreement.

Investment Earnings: Investment earnings and losses (net of investment fees and costs) shall be allocated proportionately to each participating fund based on their relative interests in the Fund during the respective period.

Permanently Restricted Net Assets: The fair value of the original and subsequent gifts to a permanent endowment and accumulations to that endowment accumulated in accordance with the applicable gift instrument.

Quasi-Endowment Fund: A fund that functions similar to an endowment, but is established or designated by authority of the Board of Trustees rather than a donor or other independent party.

Related Party Transaction: The Fund will not loan funds or securities to the University, the Foundation or related parties, including their officers, members of the Committee or Boards, employees, donors or affiliated entities either current or prospective.

Securities Lending: Investment managers or the custodian, may engage in securities lending, or the “loan” of the Fund’s securities in return for interest, to broker dealers as a means of enhancing income only pursuant to approval of the Committee.

Term Endowment Fund: A fund that functions similar to an endowment fund except that at some future time or upon the occurrence of a specified future event the funds originally contributed become available for expenditure.

True Endowment: A fund that is not wholly expendable by the institution on a current basis under the terms of a gift instrument or other record.

Underwater Endowment: An endowment fund which has negative accumulated earnings (accumulated distributions and losses exceed accumulated earnings).

XIII

XII. CONFLICTS OF INTEREST

All Committee members, the Treasurer and staff responsible for making or advising on investment decisions shall comply with the Foundation’s Conflict of Interest Policy and all persons providing advice to the Committee or the Boards on investment matters shall disclose at the beginning of any discussion or consideration of any investment issue, any relationships, material beneficial ownership, or other material interest(s) which the person has or may reasonably be expected to have, with respect to any investment issue under
discussion or consideration. The Committee member may recuse himself or herself from the decision making process or the Committee Chair may require such persons to remove themselves from the process. All such disclosure shall be recorded in the minutes of the respective meeting.

Any member of the Committee or individual responsible for making or providing advice to the Committee on investment matters shall refuse any remuneration, commission, gift, favor, service or benefit that might reasonably be perceived to influence them in the discharge of their duties, unless disclosed in writing to the Committee Chair. Failure to disclose any material benefit may be grounds for disciplinary action including removal from the Committee. This provision shall not preclude the payment of ordinary fees and expenses to the Foundation’s custodians, investment managers, or advisors in the course of their services on behalf of the Foundation.

XIV
XIII. COMMITTEE APPROVED ATTACHMENTS

The Investment Committee shall include, as attachments to this Policy, procedures and other documents that the Committee has adopted or determined to be relevant to implementation or interpretation of this Policy.

1. The Uniform Prudent Management of Institutional Funds Act (AS 13.70.010 – 13.79.095)
2. Investment Powers and Duties (AS 37.10.071)
3. Manager Selection and Termination Investment Guidelines and Philosophy Statement
4. Manager Due Diligence Guidelines
5. Current Target Rate of Return
6. Current Target Asset Allocation
7. Commitments to Future Investments (See Preliminary Quarterly Performance Reports)
8. Manager Mandates, Endowment Spending Guidelines, and Benchmarks (Pending)