



Community Foundation of South Lake County, Inc. Investment Policy & Guideline Adopted 2006

SECTION I Investment Philosophy, Strategy and Goals

The investment philosophy, strategy and goals for the Community Foundation of South Lake County, Inc. portfolio are described herein. This policy supersedes any previously dated policies and strategies. The philosophy, strategy and goals are as follows:

Limitations of Policies

The Community Foundation holds and administers two types of funds: 1) Endowment Funds and, 2) Non-endowed or Pass-Through Funds. Endowment funds are those that are used to provide income, which will be used for charitable purposes. These are funds in which principal or a main portion of principal (at least 90%) is to be maintained in perpetuity and only income can be used for charitable purposes. Non-endowed funds are those, which are to be used for charitable purposes with little or no principal remaining to the Community Foundation: however, the Fiscal Committee provides financial oversight of the moneys.

A. Investment Philosophy

The Community Foundation of South Lake County, Inc. (CFSLC) Investment Committee (the "Committee") is appointed by the CFSLC Board of Directors to oversee the investment(s) of the Foundation's assets (the "Fund"). As fiduciaries, the Committee will establish and implement an investment policy for the Fund, using prudence, care and diligence in accordance with Prudent Investor Act.

It is the responsibility of the CFSLC to preserve the Fund's capital and maximize investment earnings in a prudent manner. This will be accomplished through a sound investment strategy considering the need to maintain a long-term horizon when making investment decisions. The Committee, with the approval of the CFSLC Board of Directors, reserves the right to revise the investment policy of the Fund to accommodate changing legal, economic or investment environments to meet its fiduciary responsibilities.

B. Investment Objective

The Fund's assets shall be invested in accordance with sound investment practices that emphasize long-term investment fundamentals. In establishing the investment



Community Foundation of South Lake County, Inc. Investment Policy & Guideline Adopted 2006

objectives for the Fund, the Committee has taken into account the time horizon available for investment, the Foundation's cash flows and liabilities, and its Spending Policy. Consequently, an investment objective of long-term growth for the Fund has been adopted.

Long-term capital appreciation shall be the primary source of return, with income as a supplementary source of gains.

The assets are exposed to risk and may experience large fluctuations in market value from year-to-year, but that is acceptable since the investments are for the long term.

The assets are expected to earn long-term returns sufficient to grow the purchasing power of those assets.

The Fund shall be diversified in order to reduce the risk of wide swings in market value from year-to-year.

C. Investment Strategy

The investment policy for the Fund has been developed through an evaluation of alternatives reviewed by the Committee. This policy represents a consensus of inputs from both committee members and investment consultants.

Among the factors considered in the development of this investment policy are:

- Investment Risk and Volatility
- Investment Time Horizon
- Roles of Various Asset Classes
- Asset Allocation
- Rebalancing procedures

1. Investment Risk and Volatility

Risk is often defined in terms of portfolio variability relative to achieving the investment goals for a portfolio, as well as the probability of not maintaining purchasing power over the plan's investment time horizon. The Committee



Community Foundation of South Lake County, Inc. Investment Policy & Guideline Adopted 2006

understands that in order to achieve its objectives for its accounts, the assets will experience volatility of returns and fluctuations of market value. The Committee will evaluate these risks at least annually and consider adjustments to the asset mix in order to maintain an acceptable level of risk for the Fund's portfolio.

2. Investment Time Horizon

The time horizon for the Foundation is considered in perpetuity. However, when making investment decisions and evaluating investment performance, the Committee shall focus on an investment time horizon of five-to-seven years, allowing sufficient time for capital markets to experience typical valuation, monetary and economic movement. However, the investment performance will be monitored and compared with designated benchmarks on a quarterly basis using a 3-year rolling average to evaluate overall performance.

3. Role of Various Asset Classes

The role of equities is to generate total returns in excess of inflation and provide for the Fund's growth while the role of fixed income investments is to provide diversification that reduces the variability of the portfolio and produces income. Cash equivalents are used to meet operating needs of the Fund, and to accumulate reserves for timely purchases of long-term investments.

4. Asset Allocation

The Committee, with the help of its consultant(s), shall determine the asset allocation strategy. The Committee will manage the asset allocation mix within the ranges described by this investment policy.

To implement this strategy, the Committee will use an asset allocation discipline that will diversify investments among asset classes and is intended to meet or exceed the primary investment goals.

The currently approved asset allocation ranges are:

Asset Class

Allocation Range



Community Foundation of South Lake County, Inc.
Investment Policy & Guideline
Adopted 2006

| | |
|---------------------------|---------------|
| Equities | 45% (+/- 10%) |
| Large Cap | 20% |
| Mid Cap | 5% |
| Small Cap | 5% |
| International | 10% |
| REITS | 5% |
| Alternative Investments** | 10% (+/- 5%) |
| Fixed Income | 40% (+/- 10%) |
| Govt./Agencies | |
| Corporates | |
| Foreign Debt | |
| Cash | 5% (+/- 5%) |

5. Rebalancing Procedures

The allocation to each asset class and to investment styles within asset classes is expected to remain relatively stable over most market cycles.

Since capital appreciation (depreciation) and trading activity in each individually managed portfolio can result in a deviation from the overall asset allocation, the aggregate asset allocation will be monitored and the Committee will review the asset allocation and manager structure at least annually. Should an allowable range for an asset class be violated, the Committee must rebalance the existing assets to the target asset mix within three months of the deviation. In addition, the Committee shall review the actual asset allocation at least annually in order to ensure conformity with the adopted strategic allocation.

To achieve the rebalancing of the Fund, the Committee may re-direct contributions and disbursements from individual investment managers as appropriate, in addition to shifting assets from one investment manager to another. The Committee shall coordinate all rebalancing actions with the Investment Consultant and the Investment Managers.

The Committee recognizes the importance of maintaining a long-term



Community Foundation of South Lake County, Inc. Investment Policy & Guideline Adopted 2006

strategic asset mix for the Fund and does not intend to engage in any tactical asset allocation or market timing assets mix shifts.

D. Investment Goals

Investment goals for all invested funds of the CFSLC are to meet, and if prudent, exceed certain benchmarks:

1. Performance goal is 5% (spending policy) plus CPE on a 3-year rolling average.
2. Individual managers should equal or exceed an agreed upon index.

The goal of each Investment Manager shall be to meet or exceed the market index, or blended market index, selected and agreed upon by the Committee. The Manager shall display an overall level of risk in the portfolio that is consistent with the risk associated with the asset style and relevant index. Risk will be measure by the standard deviation of quarterly returns on a 1, 3, and 5-year basis.

SECTION II Investment Guidelines

The Committee will consider investments appropriate for the Fund and properly diversified in order to reduce the risk of large concentrations in a single asset class. Permissible assets include domestic and international equities, REITS, Alternative Investments, domestic and foreign fixed income instruments, and cash and equivalents. These assets will be professionally managed, which can include the use of index funds as an alternative.

A. Equity Investment Guidelines

1. Investments may be made in:
 - Common Stocks
 - Convertible bonds and preferred stocks
 - American Depository Receipts and Ordinary Shares
 - Mutual funds invested in domestic and/or international securities
2. No initial or additional investment in any one company shall exceed five per cent (5%) of the total equity portion of the portfolio.



**Community Foundation of South Lake County, Inc.
Investment Policy & Guideline
Adopted 2006**

3. No single issue shall exceed five per cent (5%) of the market value of that manager’s total portfolio without the Committee’s approval.
4. The investment manager shall not buy, sell, or otherwise engage in:
Speculative derivative instruments Non-marketable securities
Short sales/short against the box Margin purchases
**STOCKS OF COMPANIES INVOLVED WITH TOBACCO, LIQUOR PRODUCTS,
OR GAMBLING INTEREST (EXCLUDING MUTUAL FUNDS)**

B. Index Fund Guidelines

When index funds are utilized as investment choices for the assets, the Fiscal Committee will be responsible for:

1. Selecting the mutual fund family wherein appropriate index funds are available and online security is safeguarded.
2. Establishing proper procedures for staff and other designated persons to have access to the account.
3. Having quarterly reviews of the investment portfolio conducted by an outside consultant.

C. Fixed Income Investment Guidelines

1. Portfolio maturity shall be consistent with a broad bond index (Lehman Aggregate). Portfolio duration shall not exceed the Lehman Aggregate by +/- 35%.
2. Permissible investments include:
US Dollar denominated instruments
International Fixed Income instruments
Mutual funds managed in a manner similar to these guidelines
3. The portfolio will only be invested in investment grade fixed income



Community Foundation of South Lake County, Inc. Investment Policy & Guideline Adopted 2006

securities, defined as those bonds with an average rating of at least BAA by S&P.

4. Prudent diversification will be maintained across instrument, market sectors and industries. Except for US Government issues, the holdings of any one issuer shall not exceed five per cent (5%), at market, of the portfolio.
5. The investment manager shall not buy, sell or otherwise engage in:
 - Options
 - Securities lending or borrowing uncovered positions

D. Cash Equivalents and Short-Term Investment Guidelines

1. Each security shall have a maturity of thirteen months or less.
2. Approved market sectors and instruments include:
 - a. Issues of US Government and federal agencies and issued backed by the full faith and credit of the US Government; corporate and bank issues including commercial paper, corporate notes, bankers acceptances, certificates of deposit, time deposits and other debt instruments deemed suitable.
 - b. Repurchase Agreements, which are subject to 102% collateralization with daily valuation and in the custody of a trustee or custodian appointed by the Committee.
 - c. Money market mutual funds and variable rate preferred.
3. Cash equivalent reserves shall consist of cash instruments having a quality rating by at least One rating agency of a –1 by S&P, P-1 by Moody's, F-1 by Fitch, maturing in 13 months or less.
4. Prudent diversification will be maintained across instruments, market sectors and industries. Except for US Government and Agency issues, the holdings of any one issuer shall not exceed 10% (at market) of the portfolio.



Community Foundation of South Lake County, Inc. Investment Policy & Guideline Adopted 2006

SECTION III Investment Responsibilities

A. The Committee is responsible for:

1. Establishing, reviewing and amending the CFSLC's Investment Policy with the approval of the CFSLC Board of Directors.
2. Selection and termination of investment consultants, managers, and financial custodians.

Although there are no strict guidelines that will be utilized in selecting investment consultants or investment managers, the Committee will consider the length of time the firm has been in existence, its track record, fees, assets under management, and the amount of assets the Foundation already has invested with the firm.

3. Enforcing established investment philosophies, strategies and goals.
4. Providing annual cash flow requirements for the investment managers.
5. Reviewing monthly investment account statements and reporting any items of significant interest to the CFSLC and Fiscal Committee Chairperson.
6. Monitoring adherence to the established investment philosophies, strategies and goals.
7. Maintaining working knowledge of the factors pertinent to the prudent supervision of the Fund.

B. The Investment Managers are responsible for:

1. Compliance with the CFSLC's established philosophies, strategies and goals.
2. Communicating ideas, forecasts and other pertinent information with the



Community Foundation of South Lake County, Inc. Investment Policy & Guideline Adopted 2006

Executive Director and Investment Committee that may positively or negatively impact the Fund.

3. Submitting monthly statements that will include, at a minimum:
 - a. Asset allocation percentages
 - b. Detail of all expenses including fees.
 - c. Activity detail describing all transactions.
 - d. Asset detail of all current holdings with cost/market values, number of units, percentage of sector and total portfolio, estimated annual income, and market yield.
 - e. Also, on a quarterly basis provide total returns net of all fees for the total fund and each asset class, in comparison with designated benchmarks. Include year-to-date, trailing 12 months, and 3- and 5-year returns, where applicable.
4. The Investment Manager shall handle the voting of proxies and tendering of shares in a manner that is in the best interest of the Foundation and consistent with the investment objectives contained herein.

C. The Investment Consultant is responsible for:

1. The Investment Manager shall handle the voting of proxies and tendering of shares in a manner that is in the best interest of the Foundation and Serving as an advisor to the Committee. As such, the Consultant will not have discretion to make investment or allocation decisions.
 - a. All investment advice offered by the Consultant will be consistent with the investment objectives, policies, guidelines and constraints as established in the Investment Policy statement.
 - b. The Consultant will assist in the development, implementation and periodic review of the Investment Policy.
 - c. The Consultant will conduct Investment Manager searches when requested by or approved by the Committee. The Consultant may also recommend a change.
 - d. The Consultant will monitor the performance of the Investment



Community Foundation of South Lake County, Inc. Investment Policy & Guideline Adopted 2006

Managers and will report these findings to the Committee.

This may include, but not be limited to the following:

- 1.) Statements showing compliance with asset allocation guidelines
- 2.) Comparison of returns to benchmarks
- 3.) Comparison of returns to the performance of a universe of comparable investment managers
- 4.) A detailed statement of fees and expenses paid by the Foundation.

**** Only with approval of Investment Committee. When this asset is not included in portfolio, that portion will be allocated to Equities.**

Amended 12/5/02, 8/13/03

Approved: May 25, 2006

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