



UNIVERSITY OF CENTRAL FLORIDA  
INVESTMENT POLICY MANUAL

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## **Investment Policy**

The university establishes its investment parameters in accordance with Sections 1011.42(5) and 218.415, Florida Statutes, and complies with all applicable state ordinances and covenants. The Vice President for Administration and Finance and Chief Financial Officer ("Chief Financial Officer") or designee will consolidate, where practicable and allowable, cash balances and investments from all funds covered by this policy to minimize risk exposure and maintain liquidity while maximizing investment earnings.

This policy and manual is applicable to the University of Central Florida funds being held to meet current expenses and the excess of funds required to meet current expenses. This policy and manual is also applicable to the university's various Direct Support Organizations that do not have an investment policy or manual approved by its board.

## **Investment Objectives**

As required by Section 218.415, Florida Statutes, the investment objectives of the university for invested funds shall be to provide for safety of capital, liquidity of funds, and investment income, in that order. The optimization of investment returns shall be secondary to the requirements for safety and liquidity. In addition to funds invested in the authorized State Treasurer's Special Purpose Investments Account (SPIA) and State Board of Administration's Local Government Investment Pool (SBA), excess funds may be divided in four different pools for the structured portfolio as follows: Pool I will be designated as cash reserves for operational expenses; Pool II will be designated to cover the University's medium term requirements such as debt service for the next year; Pool III will be considered excess cash reserves that may be invested in longer term investments (up to seven years). Safety and optimization of investment returns may be the investment objectives of funds invested in Pool IV only (liquidity is secondary).

1. **Safety** - Safety of principal is the foremost objective of the investment program. Investments shall be undertaken in a manner that seeks the preservation of capital in the overall portfolio. The objective will be to limit credit risk and interest rate risk to a level commensurate with the risks associated with prudent investment practices and the performance benchmarks stated herein, if applicable.
2. **Credit Risk** - The University will limit credit risk (the risk of loss due to the failure of the security issuer or backer) by diversifying the investment portfolio so that potential losses on individual securities will be minimized and by limiting investments to specified credit ratings.
3. **Liquidity** - The investment portfolio shall remain sufficiently liquid to meet all operating requirements that may be reasonably anticipated. This is accomplished by structuring the portfolio so that securities mature to meet anticipated demands (static liquidity). Since all possible cash demands cannot be anticipated, the portfolio should consist largely of securities with active secondary or resale markets (dynamic liquidity). The portfolio may be placed in local government investment pools, money market mutual funds or similar funds that perform similar to money market funds that offer same-day liquidity for short-term funds.
4. **Yield** - The investment portfolio shall be designed with the objective of attaining a market rate of return, as measured by specified benchmarks, throughout budgetary and economic cycles, taking into account the investment risk constraints and liquidity needs. Return on investment is of secondary importance compared to the safety and liquidity objectives described above. The core investments are limited to relatively low risk securities in anticipation of earning a fair return relative to the risk being assumed. Securities shall not be sold prior to maturity with the following exceptions:

- A. A security with declining credit risk may be sold early to minimize loss of principal;
  - B. A security swap that would improve the quality, yield, or target duration in the portfolio;
  - C. Liquidity needs of the portfolio require that the security be sold;
  - D. Adverse market or economic conditions.
5. Transparency - The university shall operate its portfolio in a transparent manner, making its periodic reports both available for public inspection and designed in a manner which communicates clearly and fully information about the portfolio, including market pricing, adjusted book value, and yields.
  6. Investment decisions, manager selection, proxy voting, engagement activity, and the exercise of shareholder rights shall be based solely on pecuniary factors and shall not be used to promote social, political, or ideological interests, except to the extent otherwise required by applicable law.

To the extent possible Education and General funds will be invested in the State Treasurer's Special Purpose Investment Account (SPIA) and State Board of Administration's Local Government Investment Pool (SBA); any excess Education and General funds may be invested in Pool I money market funds and Pool II or Pool III fixed income investments.

### **Performance Measurement**

As a benchmark for investment returns, the university's investment portfolio, net of fees, should strive to equal or exceed the returns provided by the State Treasurer's Special Purpose Investment Account (SPIA). However, achieving this benchmark is secondary to the requirements for safety and liquidity.

### **Prudence and Ethical Standards**

1. Prudence - The standard of prudence to be used by investment officials shall be the Prudent Person Rule and shall be applied in the context of managing an overall portfolio. University personnel, acting in accordance with this investment policy shall be relieved of personal responsibility for an individual security's credit risk or market price changes, provided deviations from expectations are reported to the university's governing board in a timely fashion and the liquidity and the sale of securities are carried out in accordance with the terms of this policy. The Prudent Person Rule states that: "Investments should be made with judgment and care, under circumstances then prevailing, which persons of prudence, discretion, and intelligence exercise in the management of their own affairs, not for speculation, but for investment, considering the probable safety of their capital as well as the probable income to be derived from the investment."
2. Ethics and Conflicts of Interest - The Chief Financial Officer and other authorized personnel shall refrain from personal business activity that could conflict with the proper execution and management of the investment program, or that could impair their ability to make impartial decisions. These investment officials shall disclose annually, in a written statement, any material interests in financial institutions with which they conduct business. They shall further disclose any personal financial/investment positions that could be related to the performance of the investment portfolio. They shall refrain from undertaking personal investment transactions with the same individual(s) with whom business is conducted on behalf of the university.

3. Delegation of Authority - Authority to manage the investment program is granted to the Chief Financial Officer. The Chief Financial Officer may delegate authority to the Assistant Vice President for Financial Affairs ("UCF Treasurer"). Additional authorized personnel include any other person or position approved by the university's governing board. The university may seek professional advice and therefore may contract with a federally registered investment advisory firm that specializes in public funds fixed income management, and it may also seek advice and counsel from the Budget and Finance Committee to assist with investment decisions. The Budget and Finance Committee will approve and, from time to time as they deem necessary, amend this investment policy. No person may engage in an investment transaction except as provided under the terms of this policy. The Chief Financial Officer shall be responsible for all transactions undertaken and shall establish a system of controls to regulate the activities of subordinate officials.

### **Broker Dealers, Safekeeping and Custody**

1. Authorized Financial Dealers and Institutions - For assets not delegated to the fiduciary management of a professional third-party investment organization, the University shall list financial institutions consisting of banks and other depository institutions authorized to provide depository and investment services. In addition, a list will be maintained of security broker/dealers consisting of "primary" dealers or regional dealers that qualify under Securities and Exchange Commission (SEC) Rule 15C3-1 (uniform net capital rule) that are providing services to the university or that the university contemplates using.
2. Delivery vs. Payment - Securities transactions between a broker-dealer and the safekeeping agent or custodian involving purchase or sale of securities by transfer of money or securities must be made on a "delivery vs. payment" basis, if applicable, to ensure that the custodian will have the security or money, as appropriate, in hand at the conclusion of the transaction.
3. Safekeeping, Custody & Perfection of Interest - Securities shall be held with a third party; and all securities purchased by, and all collateral obtained by, the university should be properly designated as an asset of the University. No withdrawal of securities, in whole or in part, shall be made from safekeeping or custody, except by an authorized staff member of the university.

### **Authorized Investments**

This investment policy is authorized by the university's Board of Trustees. The following investments are authorized to be utilized in achieving the objectives of this policy. Investments not listed are prohibited. The investment portfolio must be structured in such manner as to provide sufficient safety and liquidity to pay obligations as they come due. Investment maturities should anticipate cash flow requirements.

Prior to conducting transactions as authorized by this policy, the Chief Financial Officer shall determine the approximate maturity date based on cash-flow needs and market conditions, analyze and select one or more optimal types of investments, and competitively bid the security in question when feasible and appropriate. Except as otherwise required by law, the bid deemed to best meet the investment objectives shall be selected.

Investments shall be limited to securities selected from the following types:

1. The United States Treasury and Agency securities - Securities that are issued by the United States Treasury or those for which the full faith and credit of the United States government guarantees fully all principal and interest payments.
  - A. Credit Ratings  
Ratings are not required for U.S. Treasury securities. Agencies backed by the full faith

and credit of the United States government, such as Government National Mortgage Association (GNMA), must have at least one AAA (or its equivalent) long-term credit rating from a Nationally Recognized Statistical Rating Organization (NRSRO). The Budget and Finance Committee may direct the university to use other ratings that may be more appropriate for the prevailing economic situation.

B. Interest Rate Risk Restrictions

The United States Treasury and Agency securities backed by the full faith and credit of the United States government. At the time of purchase, securities must have an average effective maturity no greater than seven years from the date of settlement. The forward delivery period on such securities may not exceed 60 days.

2. Government Sponsored Enterprises (GSE) - Securities issued by the Federal Farm Credit Bank, the Federal Home Loan Mortgage Corporation, the Federal Home Loan Bank, the Federal National Mortgage Association, or the Federal Agricultural Mortgage Corporation. Any other GSE shall be considered as corporate debt for the purposes of this policy and shall be authorized under the criteria set forth in section 7, Corporations.

A. Credit Ratings

Authorization of the listed GSE in Section 7 is predicated upon these institutions maintaining at least one AAA (or its equivalent) long-term credit rating from a NRSRO. The Budget and Finance Committee may direct the university to use other ratings that may be more appropriate for the prevailing economic situation.

B. Interest Rate Risk Restrictions

At the time of purchase, securities must have an average effective maturity no greater than seven years from the date of settlement. The forward delivery period on such securities may not exceed 60 days.

3. The State Board of Administration's Local Government Investment Pool (SBA), the State Treasurer's Special Purpose Investments Account (SPIA) or any intergovernmental investment pool authorized pursuant to the Florida Interlocal Cooperation Act as provided in Section 163.01, Florida Statutes.

A. Credit Rating

Local Government Investment Pools - At the time of purchase, the local government investment pool must carry an A (or its equivalent) rating from a NRSRO (if applicable). The Budget and Finance Committee may direct the university to use other ratings that may be more appropriate for the prevailing economic situation.

4. Money Market Mutual Funds - Shares of any money market fund that is registered as an investment company under the federal "Investment Company Act of 1940", as amended.

A. Credit Rating

At the time of purchase, money market funds must carry an A1 (or its equivalent) rating from a NRSRO. The Budget and Finance Committee may direct the University to use other ratings that may be more appropriate for the prevailing economic situation.

B. Interest Rate Risk Restrictions

At the time of purchase, shares in the money market fund must be fully redeemable on the next business day.

5. Interest-bearing time deposits or savings accounts in Qualified Public Depositories (QPD) as defined in Section 280.02, Florida Statutes.

- A. Credit Rating or Limitations

- Bank deposits for the University must comply with Section 280.16, Florida Statutes. Such deposits in QPD's must be collateralized according to the statutory requirements.

6. Repurchase Agreements - Securities referred to in section 4 or 5 and that can otherwise be purchased under this policy may be subject to a repurchase agreement. Such securities subject to this agreement must have a coupon rate that is fixed from the time of settlement until its maturity date and must be marketable. Such securities must be delivered to the University or to a third-party custodian or third-party trustee for safekeeping on behalf of the public entity. The collateral securities of any repurchase agreement must be collateralized at no less than one hundred two percent and marked to market no less frequently than weekly. All approved institutions and dealers transacting repurchase agreements shall execute and perform as stated in the master repurchase agreement. All repurchase agreement transactions shall adhere to the requirements of the master repurchase agreement.

- A. Credit Ratings

- At the time of purchase the counterparty to any such agreement must carry short-term credit ratings which conform to those required by section 7.

- B. Interest Rate Risk Restrictions

- For repurchase agreements, at the time of purchase such agreement must have a maturity no greater than one year from the date of settlement. The forward delivery period on such securities may not exceed 60 days.

7. Corporations - United States dollar denominated debt instruments issued by a corporation or bank which is organized and operated within the United States.

- A. Credit Ratings

- At the time of purchase, all non-money market instruments must carry at least one "investment grade" (or its equivalent) long-term credit ratings from a NRSRO. For money market instruments, which comply with rule 2a7 at the time of purchase, such securities must carry at least two short-term credit ratings and no short-term credit rating may fall below A1+ from Standard & Poor's, P1 from Moody's, or F1+ from Fitch. The Budget and Finance Committee may direct the University to use other ratings that may be more appropriate for the prevailing economic situation.

- Should a security's credit rating drop below these standards after purchase, the University's authorized personnel shall act as Prudent Persons in managing the risks associated with this security and shall timely notify the Budget and Finance Committee of such an event.

- B. Interest Rate Risk Restrictions

- At the time of purchase, such securities must have an average effective maturity no greater than seven years from the date of settlement. The forward delivery period on such securities may not exceed 60 days.

8. Other investments authorized by law or by ordinance for a county or a municipality.
9. Other investments authorized by law or by resolution for a school district or a special district.

10. Direct Support Organizations (DSO) duly authorized by the University's Board of Trustees - An agreement or memorandum of understanding must be executed prior to the placement of funds with any DSO.
11. Mutual funds, unit investment trusts, commingled investment trusts ("CITs"), professionally managed securities or other investment vehicles specifically authorized by the Budget and Finance Committee.

### **University Endowment**

The preferred recipient of gifts for the university is the UCF Foundation, Inc. However, there may be special circumstances whereby a monetary gift or other asset is received by the university directly, or the university may choose to establish a quasi-endowment with funds available for such purpose from other sources. In these instances, the University may choose to enter into an agreement with the UCF Foundation, Inc., to manage the investment of a portion or all of a particular University endowment or quasi-endowment. The Foundation has several investment options. The decision as to which of the options to be utilized for university funds would be specified in a contractual document between the university and the Foundation, with specific instructions as to the authorization and manner in which receipts and disbursements would be processed. The university's assets may be pooled with Foundation assets for investment purposes, but with procedures in place for detailed accounting and reporting of the university's shares in the pool. These investments may deviate from the balance of this policy's direction to limit investments to no more than five (5) years duration.

### **Risk and Diversification**

The university portfolio shall be diversified to the extent practicable to control the risk of loss resulting from over concentration of assets in a specific maturity, issuer, instrument, dealer, or bank through which financial instruments are bought and sold. The diversification strategies laid out in this policy shall be reviewed and revised periodically, as deemed necessary by the Chief Financial Officer and any revisions shall require the approval of the Budget and Finance Committee.

Investments that vary in length to maturity will be made to correlate with the University's cash flow projections. The correlation will be made conservatively, considering the University's projected need for liquidity. Cash flow information will be used as a basis for informed decisions regarding the allocation of cash balances into categories of investments with varying maturities. The investment vehicles used in the four categories will be determined by the Chief Financial Officer in consultation with an investment consultant, the chair of the Budget and Finance Committee and other appropriate University staff.

In order to ensure liquidity and diversify risk to principal, multiple depository banks, in addition to the bank(s) currently under contract with the University to provide treasury services, may be utilized to hold and invest short term cash.

### **Qualified Public Depositories, Investment Institutions and Dealers**

The UCF Treasurer will maintain the current approved list of qualified public depositories (as defined in Section 280.02, Florida Statutes).

### **Third Party Custodial Agreements**

Securities will be held with a third party; and all securities purchased by, and all collateral obtained by the university will be properly designated as an asset of the university. If a bank serves in the capacity of Investment Manager, said bank could also perform the required custodial and reporting services. No withdrawal of securities, in whole or in part, shall be made from safekeeping, except by those designated within the Investment Management and Custodial Agreement between the Custodian and the university. Securities transactions between a broker-dealer and the custodian involving purchase or sale of securities by transfer of money or securities must be made on a "delivery vs. payment" basis, if applicable, to ensure that the custodian will have the security or money, as appropriate, in hand at the conclusion of the transaction.

### **Master Repurchase Agreement**

The UCF Treasurer or the Investment Manager, if applicable, will maintain a master repurchase agreement and require all approved institutions and dealers transacting repurchase agreements to adhere to the requirements of the master repurchase agreement. The master repurchase agreement is a separate document.

### **Bid Requirement**

For assets not delegated to the fiduciary management of a professional third-party investment organization, the university shall require purchases and sales to be executed in a competitive bid environment wherein at least three (3) offers or bids are requested for each security. Exceptions to this approach may be made when (1) prices for purchases or sales are compared to systems providing current market prices and deemed reasonable, (2) when the security to be purchased is unique to one institution or (3) the security has recently been issued and is trading at the same price by all financial institutions.

### **Internal Controls**

The UCF Treasurer shall establish a system of internal controls and operational procedures, which will be documented in writing. The internal controls will be reviewed by the University Audit staff and are subject to audit by the Auditor General of the State of Florida. The controls will be designed to prevent losses of public funds arising from fraud, employee error, imprudent actions by employees and misrepresentation by third parties. The internal controls and operational procedures is a separate document.

### **Competitive Solicitation**

Periodically, the university will undertake solicitations for Investment Management services. This requirement will pertain to managers who manage separate account portfolios for the University. Fees, management team, performance track record, firm history and other factors will be evaluated in selecting the most favorable firms for the university.

At least once every four (4) years, the university shall conduct a competitive solicitation, public procurement process, or formal market review for investment manager services, investment consultant services, and other material investment advisory services, as applicable and as determined by the Chief Financial Officer in consultation with Procurement Services and the Office of the General Counsel. The review shall evaluate investment performance, risk management, fees, service quality, compliance, organizational stability, and the continued appropriateness of each mandate. Incumbent firms may be considered and may be retained if selected or approved through the applicable process. Any exception to the five-year review cycle shall be documented in writing and approved in accordance with university procurement requirements and applicable law.

## **Continuing Education**

The Chief Financial Officer, UCF Treasurer, or designee will annually (during each calendar year) complete eight hours of continuing education in subjects or courses of study related to investment practices and products.

## **Reporting**

1. **Methods** - The Chief Financial Officer, or designee, shall or shall have prepared and provide to the Budget and Finance Committee an investment report at least quarterly, including a management summary that provides an analysis of the status of the current investment portfolio and transactions made over the last quarter. An outside investment advisor or other third party may be utilized to prepare the report. The management summary will be prepared in a manner that will allow the University to ascertain whether investment activities during the reporting period have conformed to the investment policy. This investment report shall include securities in the portfolio by class or type, book value, income earned, and market value as of the report date. Such reports shall be available to the public.
2. **Compliance** - If any investment held does not meet the guidelines of this policy, it shall be temporarily exempted from the requirements of the policy until appropriate disposition of the security is agreed upon with the University's investment advisory firm.

## **Annual Review**

This policy shall be reviewed on an annual basis and presented to the Budget and Finance Committee for review, whether or not amendments are proposed. Any changes or amendments to the manual, operating funds supplement, or operating pool sub-sections must be approved by the Budget and Finance Committee and, to the extent required by law, regulation, delegation of authority, or university governance documents, by the Board of Trustees.

## Glossary

**Benchmark.** A comparative base for measuring the performance or risk tolerance of the investment portfolio. A benchmark should represent a close correlation to the level of risk and the average duration of the portfolio's investments.

**Bid.** The price offered by a buyer of securities.

**Collateral.** Securities, evidence of deposit, or other property that a borrower pledges to secure repayment of a loan. Also refers to securities pledged by a bank to secure deposits of public monies.

**Delivery vs. Payment.** Delivery versus payment is delivery of securities to a third party with an exchange of money for the securities. The transaction is not complete until both parties provide their commitments.

**Diversification.** Dividing investment funds among a variety of securities offering independent returns.

**Direct Support Organization (DSO).** An organization pursuant to Section 1004.28, Florida Statutes, as certified by the University Board of Trustees.

**Federal Deposit Insurance Corporation (FDIC).** A federal agency that insures bank deposits, currently up to \$250,000 per deposit.

**Federal Farm Credit Bank (FFCB).** The Federal Farm Credit Banks Funding Corporation issues debt securities as fiscal agent for the Farm Credit System, which is a nationwide network of borrower-owned lending institutions and service organizations specializing in agricultural and rural America. The mission of this government-sponsored enterprise is to ensure the availability of sound, dependable funding for agricultural producers, cooperatives, and certain farm related business.

**Federal Home Loan Bank (FHLB).** Government sponsored wholesale banks that lend funds and provide correspondent banking services to member commercial banks, thrift institutions, credit unions and insurance companies. The mission of the FHLBs is to liquefy the housing related assets of its members who must purchase stock in their district bank.

**Federal Home Loan Mortgage Corporation (FHLMC).** FHLMC, commonly referred to as Freddie Mac, is a government sponsored enterprise that provides liquidity to the mortgage markets, much like FNMA and FHLB.

**Federal National Mortgage Association (FNMA).** FNMA was chartered under the Federal National Mortgage Association Act in 1938. FNMA is a federal corporation working under the auspices of the Department of Housing and Urban Development (HUD). It is the largest single provider of residential mortgage funds in the United States. Fannie Mae, as the corporation is called, is a private stockholder-owned corporation. The Corporation's purchases include a variety of adjustable mortgages and second loans, in addition to fixed-rate mortgages. FNMA's securities are also highly liquid and are widely accepted. FNMA assumes and guarantees that all security holders will receive timely payment of principal and interest.

**SOFR.** Secured Overnight Financing Rate, or any successor or replacement benchmark approved for use in applicable investment, banking, financing, or contractual arrangements.

**Liquidity.** A liquid asset is one that can be converted easily and rapidly into cash without a substantial loss of value. In the money market, a security is said to be liquid if the spread between bid and asked prices is narrow and reasonable size can be done at those quotes.

**Market Value.** The price at which a security is trading and could presumably be purchased or sold.

**Master Repurchase Agreement.** A written contract covering all future transactions between the parties to repurchase 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 date upon which the principal or stated value of an investment becomes due and payable.

**Portfolio.** Collection of securities held by an investor.

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

**Qualified Public Depository.** Any bank, savings bank, or savings association that is organized under the laws of the United States or the State of Florida; has its principal place of business or a branch office to receive deposits in Florida; has deposit insurance under the provisions of the Federal Deposit Insurance Act; meets the requirements of Chapter 280, Florida Statutes (Florida Security for Public Deposits Act); and has been designated by the Chief Financial Officer of the State of Florida as a qualified public depository.

**Repurchase agreement (REPO).** A holder of securities sells these securities to an investor with an agreement to repurchase them at a fixed price on a fixed date. The security "buyer" in effect lends the "seller" money for the period of the agreement, and the terms of the agreement are structured to compensate him for this. Dealers use REPOs extensively to finance their positions. Exception: When the Fed is said to be doing REPOs, it is lending money that is increasing bank reserves.

**Safekeeping.** A service to customers rendered by banks for a fee whereby securities and valuables of all types and descriptions are held in the bank's vaults for protection.

**Spread.** (1) The yield or price difference between the bid and offer on an issue. (2) The yield or price difference between different issues.

**State Board of Administration's Local Government Investment Pool (SBA).** The aggregate of all funds from political subdivisions that are placed in the custody of the State Board of Administration for investment and reinvestment.

**State Treasury Special Purpose Investment Account (SPIA).** The aggregate of all funds from governmental entities that are placed in the custody of the State Treasury for investment and reinvestment.

**Treasury Bills.** A non-interest bearing discount security issued by the U.S. Treasury to finance the national debt. Most bills are issued to mature in one (1) month, three (3) months, or six (6) months.

**Yield.** The rate of annual income return on an investment, expressed as a percentage.

(1) Income yield is obtained by dividing the current dollar income by the current market price for the security. (2) Net yield or yield to maturity is the current income yield minus any premium above par or plus any discount from par in purchase price, with the adjustment spread over the period from the date of purchase to the date of maturity of the bond.

## **University of Central Florida Investment Policy Manual OPERATING FUNDS SUPPLEMENT**

This Operating Funds Supplement (Supplement) and its sub-sections are part of the University of Central Florida Investment Policy Manual and are intended only to complement the objectives and guidelines outlined therein. The purpose of this Supplement is to set forth the specific investment objectives and parameters for the management of financial assets of the University of Central Florida Operating Funds (four internally segmented portfolios collectively referred to as the Fund). This Supplement is designed to ensure the prudent management of financial assets, the availability of operating and capital funds when needed, and to earn an investment return competitive with comparable funds and appropriate measurement benchmarks.

This document will be used to identify and convey the specific objectives and restrictions of each of the four (4) Operating Fund Pools, which shall be designated as Operating Pools I-IV in sub-sections to this Supplement. Whereas individual guidelines and objectives will be defined for each Pool, the following criteria will apply collectively to all of the Operating Pools.

### **I. Investment Guidelines**

#### **A. Authorized Investments**

Pursuant to the investment powers of the Budget and Finance Committee as set forth in the Florida Statutes and the delegation of authority granted by the University Board of Trustees, the Budget and Finance Committee sets forth the following general investment guidelines and limitations for all Operating Pools where the listed security type is an allowable investment.

##### **1. Equities**

- a. Securities must be traded on a national exchange or electronic network.
- b. Not more than 5% of the Fund's assets, at the time of purchase, shall be invested in the common stock, capital stock or convertible stock of any one issuing company, nor shall the aggregate investment in any one issuing company exceed 5% of the outstanding capital stock of the company.
- c. All securities must be readily marketable.
- d. Additional criteria may be outlined in the specific Operating Pool guidelines and/or a manager's addendum.

##### **2. Fixed Income**

- a. Not more than 3% of the Fund's assets, at the time of purchase, shall be invested in bonds issued by any single corporation.
- b. No more than 10% of the total portfolio should be invested in a single industry.
- c. All securities must be readily marketable.
- d. Additional criteria may be outlined in the specific Operating Pool guidelines and/or a manager's addendum.

### 3. Cash & Equivalents

- a. The money market fund(s) or short-term investment fund (STIF) options provided by the Fund's custodian.
- b. Securities must be rated in one of the two (2) highest credit quality categories for short-term securities by at least two nationally recognized rating services.
- c. The maturity of any single security shall not exceed 180 days and shall maintain a dollar-weighted average effective maturity of 90 days or less.
- d. All securities must be readily marketable.

### 4. Pooled Investment Funds

- a. Investments made by the Fund may include pooled investment funds. For purposes of this Supplement, pooled investment funds may include, but are not limited to, mutual funds, commingled funds, exchange-traded funds, limited partnerships and private equity.
- b. Pooled investment funds may be governed by separate documents which may include investments not expressly permitted in this Supplement. In the event of investment by the Fund into a pooled investment fund, the Budget and Finance Committee will adopt the prospectus or governing policy of that pooled investment fund as the stated addendum to this Supplement.

## B. Absolute Restrictions

No investments shall be permitted in:

1. Any investment prohibited by State or Federal Law.
2. Any investment not specifically allowed as part of this Supplement or its sub-sections.
3. Direct investment in companies, securities, or entities identified on applicable restricted or scrutinized company lists maintained by the State Board of Administration, the Department of Management Services, or otherwise prohibited under Florida law is prohibited. The University, Investment Consultant, and Investment Managers shall monitor applicable restricted lists and shall address any direct holding that becomes prohibited after purchase in accordance with applicable law, fiduciary duties, prudent investment standards, and written guidance from the Office of the General Counsel. Indirect investments through pooled investment funds shall be monitored and addressed consistent with applicable Florida law and the governing documents of the pooled investment fund.
4. The Board hereby adopts the provisions of Florida Statutes §215.4725 as regulating their investments. Direct investment in "Entities that Boycott Israel" identified in the periodic publication by the State Board of Administration, in conjunction with the Department of Management Services, is prohibited. Securities identified on the list must be divested within twelve (12) months of the company's initial appearance on the list. However, if divestiture of business activities is accomplished and the company is subsequently removed from the list, the manager can continue to hold that security.

## II. Investment Procedures

UCF receives cash from a number of sources during the course of a fiscal year. It is primarily

made up of Educational and General, Auxiliary, Contracts and Grants, Foundation funds, and other miscellaneous funds. These funds are bifurcated within the general ledger based on state statutes and other regulations and will be invested in different ways.

Education and General funds come in the form of student tuition and fee payments and state support. For purposes of this investment policy, these funds will be invested in the following manner.

1. All state support will be deposited in SPIA (Special Purpose Investment Account). Those funds come into the university on a bi-weekly basis.
2. All other Educational and General funds come into the university via deposits to the university Bank of America account, as a result of university operations with students making tuition payments, contract and grant payments, and Foundation payments.

All non-Education and General funds come into the university via deposits to the university Bank of America account.

All funds received by the university will be managed using a ladder and structured short term cash management program. This program will include time horizons based on liquidity, cash flow and programmatic needs. All investment time horizons will adhere strict rules and regulations of the state of Florida. The cash management program will take into account three investment vehicles. They are: SPIA, BNY Mellon and Bank of America.

The cash management protocols are as follows:

1. The Florida State Treasury office requires each university to maintain a floor balance within the SPIA fund. This floor balance is calculated based on the average daily holdings within the fund over previous monthly periods and is periodically reviewed and updated by the State Treasury throughout the year.
2. All state support that is subsequently recorded directly into SPIA when transferred from the State of Florida, will either be liquidated from SPIA and reinvested in Pool I, or retained for investment in SPIA depending on the market environment.
3. All student tuition and fee payments, contracts and grants, Foundation reimbursements, and auxiliary revenues that come into Bank of America will be analyzed for daily liquidity to meet the university's daily cash needs, and any excess over \$5 million on any given day will be invested in Pool I or SPIA.
4. Pool I will only have securities that are safe, liquid and available for immediate liquidations as further defined in the Pool I subsection of the university's investment policy.
5. On a periodic basis, the UCF Treasurer, in coordination with the Chief Financial Officer, University investment advisors, and individual investment pool managers, will evaluate the balances within Pool I and the other Operating Pools and may recommend to the University Board of Trustees or Budget and Finance Committee, as applicable, a periodic rebalancing of eligible funds to Pool II, Pool III, and Pool IV.
6. Operating Pool balances shall be determined based on the University's cash flow forecast, reserve needs, liquidity horizon, debt service requirements, and other operating and capital requirements. No Operating Pool shall be required to maintain a minimum balance unless a minimum balance is expressly stated in this policy, required by law, required by

bond documents, or separately approved by the Board of Trustees or Budget and Finance Committee. The Chief Financial Officer, in consultation with the UCF Treasurer, investment consultant, and investment managers, may recommend that an Operating Pool be reduced to a zero balance and placed in inactive status when the funds otherwise assigned to that pool are no longer required for the liquidity horizon or investment purpose of that pool. An inactive pool may remain authorized under this policy and may be reactivated in the future upon recommendation of the Chief Financial Officer and approval by the Budget and Finance Committee.

### III. Portfolio Communications & Compliance

- A. It is the direction of the Budget and Finance Committee that the Fund assets are held by a third-party custodian, and that all securities purchased by, and all collateral obtained by the Fund shall be properly designated as Fund assets. No withdrawal of assets, in whole or in part, shall be made from safekeeping except by an authorized member of the Board of Trustees or their designee. Securities transactions between a broker-dealer and the custodian involving purchase or sale of securities by transfer of money or securities must be made on a "delivery vs. payment" basis to ensure that the custodian will have the security or money in hand at conclusion of the transaction.
- B. On a monthly basis, the custodian shall supply an accounting statement that will include a summary of all receipts and disbursements and the cost and the market value of all assets.

On a quarterly basis, the Investment Managers shall provide a written report affirming compliance with the provisions outlined in this Supplement, the respective sub-section and the Investment Manager's addendum (collectively referred to as "Permitted Provisions Documents"). If an Investment Manager owns an investment that complied with Permitted Provisions Documents at the time of purchase, which subsequently exceeds the applicable limit or does not satisfy the Permitted Provisions Documents, such excess or noncompliant investments may be continued until it is economically feasible to dispose of such investment in accordance with the prudent man standard of care. However, no additional assets may be allocated to the designated investment unless authorized in writing by the Budget and Finance Committee. Investment Managers will provide immediate written notice to the Budget and Finance Committee of any deviation from the standards set forth in the Permitted Provisions Documents and are also required to provide an action plan outlining the investment 'hold or sell' strategy.

- C. The Investment Consultant shall evaluate and report on a quarterly basis the rate of return net of investment fees and relative performance of the Fund.
- D. The Investment Consultant, on behalf of the Fund, shall send a letter to any pooled investment fund referring the investment manager to the listing of 'Scrutinized Companies' by the State Board of Administration ('SBA list'), on their website [www.sbafla.com/fsb/](http://www.sbafla.com/fsb/). This letter shall request that they consider removing such companies from the pooled investment fund or create a similar actively managed pooled investment fund devoid of such companies. If the manager creates a similar pooled investment fund, the Fund shall replace all applicable investments with investments in the newly offered pooled investment fund in an expedited timeframe consistent with prudent investing standards. Once sending the required correspondence, the Fund is not required to sell or limit additional purchases of the pooled investment fund.

- E. At least annually, the Budget and Finance Committee shall provide, or cause to be provided, projected disbursement needs of the Fund to the Investment Managers so that the investment portfolio can be structured in such a manner as to provide sufficient liquidity to pay obligations as they come due. The UCF Treasurer, in coordination with the Chief Financial Officer and Investment Consultant, shall prepare or review an annual liquidity forecast or stress test that considers operating cash needs, debt service, restricted fund considerations, planned capital needs, and proposed pool allocations. To this end, the Investment Managers should, to the extent possible, attempt to match investment maturities with known cash needs and anticipated cash-flow requirements.

#### **IV. Investment Manager Responsibilities**

- A. Within the guidelines and restrictions set forth herein, it is the intention of the Budget and Finance Committee to give each Investment Manager full investment discretion with respect to assets under its management.
- B. Each Investment Manager is expected to provide any reasonable information requested by the Budget and Finance Committee. At a minimum, each manager shall provide a quarterly report detailing their investment activity, the portfolio's current value and any changes in investment philosophy or strategy. Each Investment Manager is expected to meet with the Budget and Finance Committee or their designated representatives periodically to review investment performance and philosophy.
- C. It will be the responsibility of each Investment Manager to review the monthly valuations provided by the Fund's custodian and to note, in writing, any significant discrepancies from the valuations provided in their own reports.
- D. When feasible and appropriate, all securities shall be competitively bid. Except as otherwise required by law, the most economically advantageous bid shall be selected. Commissions paid for purchase of securities must meet the prevailing best-execution rates. The responsibility of monitoring best price and execution of trades placed by each Investment Manager on behalf of the Fund will be governed by the Portfolio Management Agreement between the Fund and the Investment Manager.
- E. Investment Managers shall vote any and all proxies solicited in connection with securities held by the Fund, unless otherwise directed in the applicable investment management agreement or by the Budget and Finance Committee. Investment Managers shall produce a written proxy voting policy statement, keep records with respect to voting decisions, and submit an annual report to the Budget and Finance Committee summarizing votes cast. Voting of proxies and any related engagement activity must be conducted solely in the pecuniary interests of the Fund and in compliance with applicable Florida law.
- F. Investment Managers must promptly provide to the Budget and Finance Committee information about changes in the management, ownership and key personnel in a timely fashion, which is not to exceed one month from the change.
- G. Unless otherwise provided by the Fund's custodian, each Investment Manager will monitor portfolio activity to minimize uninvested cash balances.

## V. Criteria for Investment Manager Review

The Budget and Finance Committee wishes to adopt standards by which judgments of the ongoing performance of an Investment Manager may be made. If, at any time, any three (3) of the following is breached, the Investment Manager may be warned of the Budget and Finance Committee's serious concern for the Fund's continued safety and performance. If any five (5) of these are violated the consultant may recommend a manager search for that mandate.

- Four (4) consecutive quarters of relative under-performance verses the benchmark.
- Three (3) year trailing return below the top 40<sup>th</sup> percentile within the appropriate peer group and under performance verses the benchmark.
- Five (5) year trailing return below the top 40<sup>th</sup> percentile and under performance verses the benchmark.
- Three (3) year downside volatility greater than the index (greater than 100), as measured by down market capture ratio.
- Five (5) year downside volatility greater than the index (greater than 100), as measured by down market capture ratio.
- Style consistency or purity drift from the mandate.
- Management turnover in portfolio team or senior management.
- Investment process change, including varying the index or benchmark.
- Failure to adhere to the IPS or other compliance issues.
- Investigation of the firm by the Securities and Exchange Commission (SEC).
- Significant asset flows into or out of the company.
- Merger or sale of firm.
- Fee increases outside of the competitive range.
- Servicing issues, including key personnel stop servicing the account without proper notification.
- Failure to attain a 60% vote of confidence by the Budget and Finance Committee.
- Failure to certify compliance with applicable Florida public fund requirements, pecuniary factor requirements, proxy voting requirements, scrutinized company requirements, or other restrictions applicable to university funds.
- Failure to provide timely compliance certifications, risk reporting, holdings transparency, fee transparency, or other reporting required by the university, the Investment Consultant, or applicable law.

Nothing in this section shall limit or diminish the Budget and Finance Committee's right to terminate the manager at any time for any reason.

## VI. Review and Amendments

It is the Budget and Finance Committee's intention to review this document at least annually and to amend it to reflect any changes in philosophy, objectives, or guidelines. In this regard, the Investment Manager's interest in consistency in these matters is recognized and will be taken into account when changes are being considered. If, at any

time, the Investment Manager feels that the specific objectives defined herein cannot be met, or the guidelines constrict performance, the Budget and Finance Committee should be notified in writing.

By signing this document, the Vice President for Administration and Finance and Chief Financial Officer attests that this Supplement has been recommended by the Investment Consultant, reviewed by the Fund's legal counsel for compliance with applicable law, and approved by the Chair of the Budget and Finance Committee of the Board of Trustees.

University of Central Florida



Interim Vice President for Administration and  
Finance Chief Financial Officer

Date 6/11/26

**University of Central Florida Investment Policy Manual**  
**OPERATING FUNDS SUPPLEMENT**

**SUB-SECTION**  
**OPERATING POOL I**

This Sub-Section is a part of the Operating Funds Supplement to the University of Central Florida Investment Policy Manual and is intended only to complement the objectives and guidelines outlined therein. The purpose of this Sub-Section is to set forth the specific investment objectives and parameters for the management of financial assets of Operating Pool I.

Operating Pool I will be designated as cash reserves for operational expenses. In addition to compliance with the provisions of the Operating Funds Supplement to the University of Central Florida Investment Policy Manual, Operating Pool I investments must comply with the following guidelines and objectives.

**I. Investment Objectives**

- A. Operating Pool I should be structured to provide immediate liquidity for the University's daily operating requirements. Investments shall be made subject to the University's cash flow needs in accordance with the schedule provided by the Chief Financial Officer and approved by the Budget and Finance Committee and shall be subject to revisions thereafter.
- B. Investments shall be undertaken in a manner that seeks the preservation of capital and immediate liquidity in the portfolio. The objective will be to limit credit risk and interest rate risk to a level commensurate with prudent investment practices of such short-term cash reserve portfolios.

**II. Guidelines**

A. Authorized Investments

Pursuant to the investment powers of the Budget and Finance Committee as set forth in the Florida Statutes and the delegation of authority granted by the University Board of Trustees, the Budget and Finance Committee sets forth the following investment guidelines and limitations.

- 1. Cash & Equivalents
- 2. Pooled investment funds
  - a. For purposes of Operating Pool I, pooled investment funds will be limited to registered 2a-7 mutual funds, CDARS, US Gov't T-Bills, MMAs CDs, TDs Repos and other comparable cash and cash equivalents securities that satisfy Section 2a-7 eligibility criteria under the Investment Act of 1940.
  - b. Holdings in pooled investment funds shall be prudently diversified based on current market conditions as well as the current level of Pool I assets. Such pooled funds should be guaranteed as to timely payment of principal and interest by the Federal Government or its Agencies. Maximum Investments shall be limited to applicable guarantee coverage amounts (if any).

## 1. Target Allocations

In order to provide for a diversified and liquidity focused portfolio, the Budget and Finance Committee will employ a number of professionally managed short-term strategies to manage and administer Operating Pool I. The Finance Committee has established the following target asset allocation for Operating Pool I.

Asset Group	Target	Range	Comparison
Cash & Equivalents	100%	N/A	90 Day US T-Bills / SPIA

## III. Investment Performance Objectives

The following performance measures will be used as objective criteria for evaluating the effectiveness of the Investment Managers.

### A. Total Portfolio Performance

1. The performance of Operating Pool I will be measured for rolling three (3) and five (5) year periods. The performance of the portfolio will be compared to the return of the target index comprised of the 90-day U.S. Treasury Bill. In addition, the performance of the portfolio will be compared to the return of the Special Purpose Investment Account (SPIA).
2. On an absolute basis, the objective is that Operating Pool I will provide the necessary stability and liquidity to meet the university's daily operating needs.

## IV. Review and Amendments

It is the Budget and Finance Committee's intention to review this Sub-Section at least annually and to amend it to reflect any changes in philosophy, objectives, or guidelines. In this regard, the Investment Manager's interest in consistency in these matters is recognized and will be taken into account when changes are being considered. If, at any time, the Investment Manager feels that the specific objectives defined herein cannot be met, or the guidelines constrict performance, the Budget and Finance Committee should be notified in writing.

By signing this document, the Vice President for Administration and Finance and Chief Financial Officer attests that this Sub-Section has been recommended by the Investment Consultant, reviewed by the Fund's legal counsel for compliance with applicable law, and approved by the Chair of the Budget and Finance Committee of the Board of Trustees.

University of Central Florida



Interim Vice President for Administration and Finance,  
Chief Financial Officer

Date 6/10/26

**University of Central Florida Investment Policy Manual**  
**OPERATING FUNDS SUPPLEMENT**

**SUB-SECTION**  
**OPERATING POOL II**

This Sub-Section is a part of the Operating Funds Supplement to the University of Central Florida Investment Policy Manual and is intended only to complement the objectives and guidelines outlined therein. The purpose of this Sub-Section is to set forth the specific investment objectives and parameters for the management of financial assets of Operating Pool II.

Operating Pool II will be designated to cover the university's medium-term requirements such as debt service for the next year and any other auxiliary enterprise operational and capital needs. Operating Pool II may maintain a zero balance and inactive status when the Chief Financial Officer determines that the university's medium-term liquidity, debt service, auxiliary operating, and auxiliary capital needs are adequately addressed through Pool I, SPIA, SBA, bond accounts, operating cash, or other authorized investment pools. While inactive, Operating Pool II shall remain an authorized pool available for future use. In addition to compliance with the provisions of the Operating Funds Supplement to the University of Central Florida Investment Policy Manual, Operating Pool II investments must comply with the following guidelines and objectives.

**I. Investment Objectives**

- A. When funded, Operating Pool II should be structured to provide adequate liquidity and current income. Investments shall be made subject to the debt service and other auxiliary operational and capital cash flow needs of the university in accordance with the schedule provided by the Budget and Finance Committee and shall be subject to any revisions thereafter. Funds previously allocated to Operating Pool II may be reallocated to Operating Pool III when the Chief Financial Officer determines, based on documented cash flow forecasts and liquidity analysis, that such funds are not expected to be needed for the university's medium-term operating, debt service, auxiliary operating, or auxiliary capital requirements. Such reallocation shall be made only to the extent consistent with applicable law, bond covenants, donor restrictions, grant restrictions, contractual obligations, and the stated liquidity and risk objectives of this policy.
- B. Investments shall be undertaken in a manner that seeks the preservation of capital and adequate liquidity in the portfolio. The objective will be to limit credit risk and interest rate risk to a level commensurate with prudent investment practices of such debt service reserve portfolios.

**II. Guidelines**

**A. Authorized Investments**

Pursuant to the investment powers of the Budget and Finance Committee as set forth in the Florida Statutes and the delegation of authority granted by the University Board of Trustees, the Budget and Finance Committee sets forth the following investment guidelines and limitations.

1. Fixed Income
  - a. All fixed income investments shall maintain a minimum rating of A- or higher by a major credit rating service.
  - b. The weighted average quality of the fixed income portfolio shall maintain a rating of AA+ or higher.
  - c. Duration of the fixed income portfolio shall not exceed the effective duration of the ICE BofAML 1-Year Treasury index by 25%.
  - d. The maturity of any single security at the time of purchase shall not exceed an average effective maturity of three (3) years.
  - e. Operating Pool II shall maintain a dollar-weighted average effective maturity of one (1) year or less.
2. Cash & Equivalents
3. Pooled investment funds
  - a. For purposes of Operating Pool II, pooled investment funds may include CDARS, mutual funds, commingled funds, and exchange-traded funds. A diversified mix of various US Gov't and municipal government issues, plus high-quality corporate debt issues, particularly those securities issued by utility companies.
  - b. Investments in any single pooled investment fund shall be limited to 50% of the market value of the Operating Pool II's assets.

### III. Target Allocations

In order to provide for a diversified portfolio, the Budget and Finance Committee will engage investment professionals to manage and administer Operating Pool II. Each Investment Manager retained will be responsible for the assets and allocation of their mandate only and, where applicable, will be provided an addendum to this Sub-Section with their specific performance objectives and investment evaluation criteria. The Budget and Finance Committee has established the following target asset allocation for Operating Pool II:

<b>Asset Group</b>	<b>Target</b>	<b>Range</b>	<b>Comparison</b>
Fixed Income	<b>75%</b>	50% - 100%	ICE BofAML 1-year Treasury
Cash & Equivalents	<b>25%</b>	0%-50%	90 Day UST-Bills

The Budget and Finance Committee will monitor the aggregate asset allocation of the portfolio and will rebalance to the target asset allocation based on market conditions. If at the end of any calendar quarter, the allocation of an asset class falls outside of its allowable range, barring extenuating circumstances such as pending cash flows or allocation levels viewed as temporary, the asset allocation will be rebalanced into the allowable range. To the extent possible, cash contributions into and withdrawals from the portfolio will be executed proportionally based on the most current market values available. The Budget and Finance Committee does not intend to exercise short-term changes to the target allocation.

### IV. Investment Performance Objectives

The following performance measures will be used as objective criteria for evaluating the effectiveness of the Investment Managers.

A. Total Portfolio Performance

1. The performance of Operating Pool II will be measured for rolling three (3) and five (5) year periods. The performance of the portfolio will be compared to the return of the target index consisting of 75% ICE BofAML 1-Year Treasury and 25% 90 Day UST-Bill index.
2. On an absolute basis, the objective is that the return of the Operating Pool II portfolio will provide liquidity and current income.

V. Review and Amendments

It is the Budget and Finance Committee's intention to review this Sub-Section at least annually and to amend it to reflect any changes in philosophy, objectives, or guidelines. In this regard, the Investment Manager's interest in consistency in these matters is recognized and will be taken into account when changes are being considered. If, at any time, the Investment Manager feels that the specific objectives defined herein cannot be met, or the guidelines constrict performance, the Budget and Finance Committee should be notified in writing.

By signing this document, the Vice President for Administration and Finance and Chief Financial Officer attests that this Sub-Section has been recommended by the Investment Consultant, reviewed by the Fund's legal counsel for compliance with applicable law, and approved by the Chair of the Budget and Finance Committee of the Board of Trustees.

University of Central Florida



Interim Vice President for Administration and Finance,  
Chief Financial Officer

Date 6/10/25

**University of Central Florida Investment Policy Manual  
OPERATING FUNDS SUPPLEMENT**

**SUB-SECTION OPERATING  
POOL III**

This Sub-Section is a part of the Operating Funds Supplement to the University of Central Florida Investment Policy Manual and is intended only to complement the objectives and guidelines outlined therein. The purpose of this Sub-Section is to set forth the specific investment objectives and parameters for the management of financial assets of Operating Pool III.

Operating Pool III will be considered excess cash reserves that may be invested in longer term investments (up to seven years), including eligible funds reallocated from Operating Pool II when such funds are no longer required for the Pool II liquidity horizon or purpose. In addition to compliance with the provisions of the Operating Funds Supplement to the University of Central Florida Investment Policy Manual, Operating Pool III investments must comply with the following guidelines and objectives.

**I. Investment Objectives**

- A. Operating Pool III should be structured to provide the moderate growth and a reasonable safety of principal while generating an above benchmark total rate of return. Investments shall be made subject to the University reserve needs in accordance with the schedule provided by the Budget and Finance Committee and shall be subject to any revisions thereafter.
- B. Investments shall be undertaken in a manner that seeks to balance the growth of the portfolio against the limited time horizon of Operating Pool III. Given the limited time horizon of Operating pool III, reasonable liquidity should be maintained as a primary objective.

**II. Guidelines**

A. Authorized Investments

Pursuant to the investment powers of the Budget and Finance Committee as set forth in the Florida Statutes and the delegation of authority granted by the University Board of Trustees, the Budget and Finance Committee sets forth the following investment guidelines and limitations.

- 1. Equity
  - a. Investments in equity securities shall not exceed twenty percent (20%) of the market value of Operating Pool III's assets.
- 2. Fixed Income
  - a. All fixed income investments shall maintain a minimum rating of A- or higher by a major credit rating service.
  - b. The weighted average quality of the fixed income portfolio shall maintain a rating of AA- or higher.
  - c. The duration of the fixed income portfolio shall not exceed the effective duration of the ICE BofAML 1-5 Year Government/Corporate A or Better Index by 50%.

- d. The maturity of any single security at the time of purchase shall not exceed an average effective maturity of seven (7) years.
- 3. Cash & Equivalents
- 4. Pooled Investment Funds
  - a. For purposes of Operating Pool III, pooled investment funds may include mutual funds, commingled funds, and exchange-traded funds.

### III. Target Allocations

In order to provide for a diversified portfolio, the Budget and Finance Committee will engage investment professionals to manage and administer Operating Pool III. Each Investment Manager retained will be responsible for the assets and allocation of their mandate only and, where applicable, will be provided an addendum to this Sub-Section with their specific performance objectives and investment evaluation criteria. The Budget and Finance Committee has established the following target asset allocation for Operating Pool III. Operating Pool III may include one or more fixed income sleeves managed by one or more investment managers. Assets transferred from Operating Pool II to Operating Pool III may be allocated to a Pool III fixed income sleeve without requiring proportional allocation to the domestic equity component, provided that the Chief Financial Officer determines that the transfer is intended to preserve principal, maintain appropriate liquidity, and obtain fixed income management within the longer Pool III investment horizon. Such fixed income sleeve shall be measured against the applicable fixed income benchmark approved for that manager or mandate.

Asset Group	Target	Range	Comparison
Domestic Equity	15%	0% - 20%	S&P 500
Intermediate Fixed Income	85%	75%- 100%	ICE BofAML 1-5yr G/C A or Better
Cash & Equivalents	0%	0% -15%	90 Day US T-Bills

The Budget and Finance Committee will monitor the aggregate asset allocation of the portfolio and will rebalance to the target asset allocation based on market conditions. If at the end of any calendar quarter, the allocation of an asset class falls outside of its allowable range, barring extenuating circumstances such as pending cash flows, allocation levels viewed as temporary, designated fixed income sleeves approved by the Budget and Finance Committee, or other documented liquidity management considerations, the asset allocation will be rebalanced into the allowable range. To the extent possible, cash contributions into and withdrawals from the portfolio will be executed proportionally based on the most current market values available. For purposes of rebalancing, assets held in a designated Pool III fixed income sleeve may be evaluated separately from the total Pool III strategic allocation when approved by the Budget and Finance Committee as part of a transition, liquidity management, or reserve management strategy. The Budget and Finance Committee does not intend to exercise short-term changes to the target allocation.

### IV. Investment Performance Objectives

The following performance measures will be used as objective criteria for evaluating the effectiveness of the Investment Managers.

#### A. Total Portfolio Performance

1. The performance of Operating Pool III will be measured for rolling three (3) and five (5) year periods. The performance of the portfolio will be compared to the return of the target index consisting of 15% S&P 500 and 85% ICE BofAML 1-5 Year Government/Corporate A or Better index.
2. On a relative basis, it is expected that Operating Pool III's performance will rank in the top 40<sup>th</sup> percentile of the appropriate peer universe over three (3) and five (5) year time periods.
3. On an absolute basis, the objective is that the return of Operating Pool III will provide a total return that exceeds the Consumer Price Index plus 2%.

#### B. Equity Performance

1. The combined equity portion of the portfolio is expected to perform at a rate at least equal to the S&P 500 index.
2. On a relative basis, the equity portfolio is expected to rank in the top 40<sup>th</sup> percentile of the appropriate peer universe over three (3) and five (5) year time periods.
3. Individual components of the equity portfolio will be compared to the specific benchmarks defined in each Investment Manager addendum.

#### C. Fixed Income Performance

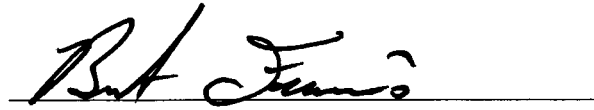
1. The combined fixed income portion of the portfolio is expected to perform at a rate at least equal to the ICE BofAML 1-5 Year Government/Corporate A or Better index.
2. On a relative basis, the fixed income portfolio is expected to rank in the top 40<sup>th</sup> percentile of the appropriate peer universe over three (3) and five (5) year time periods.
3. Individual components of the fixed income portfolio will be compared to the specific benchmarks defined in each Investment Manager addendum.

### V. Review and Amendments

It is the Budget and Finance Committee's intention to review this Sub-Section at least annually and to amend it to reflect any changes in philosophy, objectives, or guidelines. In this regard, the Investment Manager's interest in consistency in these matters is recognized and will be taken into account when changes are being considered. If, at any time, the Investment Manager feels that the specific objectives defined herein cannot be met, or the guidelines constrict performance, the Budget and Finance Committee should be notified in writing.

By signing this document, the Vice President for Administration and Finance and Chief Financial Officer attests that this Sub-Section has been recommended by the Investment Consultant, reviewed by the Fund's legal counsel for compliance with applicable law, and approved by the Chair of the Budget and Finance Committee of the Board of Trustees.

University of Central Florida

A handwritten signature in black ink, appearing to read "Bob Ferris", is written over a horizontal line.

Interim Vice President for Administration and Finance,  
Chief Financial Officer

Date 6/10/26

**University of Central Florida Investment Policy Manual**  
**OPERATING FUNDS SUPPLEMENT**

**SUB-SECTION OPERATING**  
**POOL IV**

This Sub-Section is a part of the Operating Funds Supplement to the University of Central Florida Investment Policy Manual and is intended only to complement the objectives and guidelines outlined therein. The purpose of this Sub-Section is to set forth the specific investment objectives and parameters for the management of financial assets of Operating Pool IV.

Operating Pool IV will be designated for long-term investments. In addition to compliance with the provisions of the Operating Funds Supplement to the University of Central Florida Investment Policy Manual, Operating Pool IV investments must comply with the following guidelines and objectives.

**I. Investment Objectives**

- A. Operating Pool IV should be structured to maximize the long-term growth of the portfolio while generating an above benchmark total rate of return.
- B. Investments shall be undertaken in a manner that seeks to create a diversified portfolio of long-term assets without consideration for current income or pending expenditure. While reasonable liquidity should be maintained, it will be considered a secondary objective.

**II. Guidelines**

A. Authorized Investments

Pursuant to the investment powers of the Budget and Finance Committee as set forth in the Florida Statutes and the delegation of authority granted by the University Board of Trustees, sets forth the following investment guidelines and limitations.

1. Equity

- a. Collective investment in equity and equivalent securities (domestic and international) shall not exceed seventy-five percent (75%) of the market value of Operating Pool IV's assets.
- b. Foreign securities shall not exceed twenty percent (20%) of the market value of Operating Pool IV's assets.

2. Fixed Income

- a. All fixed income investments shall maintain a minimum rating of "investment grade" or higher by a major credit rating service.
- b. The weighted average quality of the fixed income portfolio shall maintain a rating of "A" or higher.
- c. Duration of the fixed income portfolio shall not exceed the effective duration of the Bloomberg Intermediate Aggregate Bond index by fifty percent (50%).

### 3. Cash & Equivalents

### 4. Pooled Funds

- a. For purposes of Operating Pool IV, pooled investment funds may include mutual funds, commingled funds, and exchange-traded funds, limited partnerships and private equity.

## III. Target Allocations

In order to provide for a diversified portfolio, the Budget and Finance Committee will engage investment professionals to manage and administer Operating Pool IV. Each Investment Manager retained will be responsible for the assets and allocation of their mandate only and may be provided an addendum to this Sub-Section with their specific performance objectives and investment evaluation criteria. The Budget and Finance Committee has established the following asset allocation targets for the total fund:

<b>Asset Group</b>	<b>Target</b>	<b>Range</b>	<b>Comparison</b>
Domestic Equity	<b>50%</b>	0% - 55%	S&P 500
International Equity	<b>10%</b>	0% - 15%	MSCI-ACWxUS
Alternative Assets*	<b>5%</b>	0% - 10%	<b>TBD</b>
<i>Total Equity &amp; Equivalents</i>	<b>65%</b>	0%- 75%	
Fixed Income	<b>30%</b>	25% - 100%	Bloomberg Intermediate Aggregate
TIPS*	<b>5%</b>	0% - 10%	Bloomberg TIPS
<i>Total Fixed Income</i>	<b>35%</b>	30%- 100%	
Cash & Equivalents	<b>0%</b>	0%-5%	90 Day UST-Bills

\*Benchmark will default to domestic equity and fixed income, respectively, if these portfolios are not funded. Targets and ranges above are based on market value of total Operating Pool IV assets.

The Budget and Finance Committee will monitor the aggregate asset allocation of the portfolio and will rebalance to the target asset allocation based on market conditions. If at the end of any calendar quarter, the allocation of an asset class falls outside of its allowable range, barring extenuating circumstances such as pending cash flows or allocation levels viewed as temporary, the asset allocation will be rebalanced into the allowable range. To the extent possible, contributions and withdrawals from the portfolio will be executed proportionally based on the most current market values available. The Budget and Finance Committee does not intend to exercise short-term changes to the target allocation.

## IV. Investment Performance Objectives

The following performance measures will be used as objective criteria for evaluating the effectiveness of the Investment Managers.

## A. Total Portfolio Performance

1. The performance of Operating Pool IV will be measured for rolling three (3) and five (5) year periods. The performance of the portfolio will be compared to the return of the target index comprised of 50% S&P 500, 10% MSCI-All Country World excluding U.S., 5% Alternative Assets, 30% Bloomberg Intermediate Aggregate Bond and 5% Bloomberg TIPS Index.
2. On a relative basis, it is expected that Operating Pool IV's performance will rank in the top 40<sup>th</sup> percentile of the appropriate peer universe over three (3) and five (5) year time periods.
3. On an absolute basis, the objective is that the return of Operating Pool IV will provide a total return that exceeds the Consumer Price Index.

## B. Equity Performance

1. The combined equity portion of the portfolio is expected to perform at a rate at least equal to a combined target index consisting of 83% S&P 500, and 17% MSCI All Country World Index.
2. On a relative basis, the equity portfolio is expected to rank in the top 40<sup>th</sup> percentile of the appropriate peer universe over three (3) and five (5) year time periods.
3. Individual components of the equity portfolio will be compared to the specific benchmarks defined in each Investment Manager addendum.

## C. Fixed Income Performance

1. The combined fixed income portion of the portfolio is expected to perform at a rate at least equal to a combined target index consisting of 85% Bloomberg U.S. Intermediate Aggregate Bond and 15% Bloomberg TIPS index.
2. On a relative basis, the fixed income portfolio is expected to rank in the top 40<sup>th</sup> percentile of the appropriate peer universe over three (3) and five (5) year time periods.

## D. Alternative and Other Asset Performance


1. The overall objective of the alternative and/or "other asset" portion of the portfolio, if utilized, is to reduce the overall volatility of the portfolio and enhance returns. This portion of the fund will be benchmarked as outlined in the Investment Manager addendum.

## V. Review and Amendments

It is the Budget and Finance Committee's intention to review this Sub-Section at least annually and to amend it to reflect any changes in philosophy, objectives, or guidelines. In this regard, the Investment Manager's interest in consistency in these matters is recognized and will be taken into account when changes are being considered. If, at any time, the Investment Manager feels that the specific objectives defined herein cannot be met, or the guidelines constrict performance, the Budget and Finance Committee should be notified in writing.

By signing this document, the Vice President for Administration and Finance and Chief Financial Officer attests that this Sub-Section has been recommended by the Investment Consultant, reviewed by the Fund's legal counsel for compliance with applicable law, and approved by the Chair of the Budget and Finance Committee of the Board of Trustees.

University of Central Florida



Interim Vice President for Administration and Finance,  
Chief Financial Officer

Date 6/10/26

**History:** New 7-16-2008; Revised 7-23-2015, 6-17-2020,  
**Authority:** Sections 1011.42(5) and 218.415, Florida Statutes