



**REQUEST FOR PROPOSAL  
COVER SHEET**

ISSUED DATE: September 22, 2023

PROJECT: INVESTMENT MANAGEMENT SERVICES

SUBMITTAL DEADLINE: October 20, 2023 5:00pm EST

DELIVER PROPOSAL TO: Florida Workers' Compensation Insurance Guaranty Association (FWCIGA)

| Regular Mail                          | Express Mail   | Email   |
|---------------------------------------|--|---|
| PO Box 15159<br>Tallahassee, FL 32317 | 1400 Village Square Blvd<br>Suite 3-008<br>Tallahassee, FL 32312 | <a href="mailto:lfrisbie@aqfgroup.org">lfrisbie@aqfgroup.org</a><br>(5MB maximum) |

*Proposal delivery to any other location will not be considered*

**SECTION FOR VENDOR USE: RETURN COMPLETED COVER PAGE WITH PROPOSAL**

DATE OF THE PROPOSAL: \_\_\_\_\_

BUSINESS NAME: \_\_\_\_\_

MAILING ADDRESS: \_\_\_\_\_

PHYSICAL ADDRESS: \_\_\_\_\_

TELEPHONE NUMBER: \_\_\_\_\_ FAX: \_\_\_\_\_

CONTACT EMAIL: \_\_\_\_\_

BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(Signature)

THIS IS NOT AN ORDER. THE ATTACHED TERMS AND CONDITIONS SHALL REMAIN PART OF ANY CONTRACT RESULTING FROM THIS REQUEST FOR PROPOSAL. PROPOSALS SHALL BE SUBMITTED IN THE INDICATE FORMAT; ORIGINAL SIGNATURES MUST BE SUBMITTED ON THE FORM PROVIDED.

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## **1. GENERAL INFORMATION**

The Florida Workers' Compensation Insurance Guaranty Association (FWCIGA) is a nonprofit corporation created by the Florida Legislature in 1997. FWCIGA has no direct employees. All duties are performed on FWCIGA's behalf through a management agreement with the American Guaranty Fund Group (AGFG) and this RFP will be managed by AGFG employees. FWCIGA is governed by Part V of Chapter 631, Florida Statutes, as well as a Plan of Operation established by its Board of Directors. FWCIGA provides for the payment of covered claims for insurance companies declared insolvent and unable to continue making payments to claimants and policyholders. All workers' compensation insurance companies licensed in Florida are members of the FWCIGA as a condition of their authority to offer workers' compensation insurance in the state of Florida.

The FWCIGA Board of Directors set the investment policy of the Association. The Board has appointed an Investment Committee to oversee the investment functions of FWCIGA. The Investment Committee will participate in this RFP. The primary goal is liquidity and principal protection and secondary goal is maximizing returns. The core investment is limited to relatively low risk securities in anticipation of earning fair return relative to risk being assumed.

## **2. SCOPE OF SERVICES**

### **A. Statement of Purpose**

FWCIGA is seeking registered Investment Advisors (as defined and regulated by the Securities and Exchange Commission, "SEC") interested in serving as an Investment Manager for FWCIGA externally managed funds. FWCIGA is expected to use its externally managed funds to pay policyholder claims in the event of insolvencies.

The objective of this RFP process is to evaluate proposing entities' capabilities that will enable the FWCIGA to select an investment manager(s) for providing services described herein. The selection of a successful respondent and the execution of an agreement will be accomplished in accordance with Part V of Chapter 631, Florida Statutes, and the FWCIGA Plan of Operation.

### **B. General Requirements**

FWCIGA's Investment Policy is very conservative because FWCIGA's externally managed funds are used to pay current and future insolvent insurers claims and it is impossible to determine in advance when the externally managed funds will need to be utilized to pay claims. Permitted investments are limited to high quality, short duration securities, and the dollar weighted average maturity of the portfolio is limited to 2.5 years (see FWCIGA's Investment Policy – Exhibit A). Performance of the manager(s) will be evaluated based on several factors including comparison to a blended benchmark based on the Merrill Lynch 1-

3 Year US Government and Corporate A Rated & Above Index and the Merrill Lynch 1-5 Year US Government and Corporate A Rated & Above Index. Strict compliance with FWCIGA Guidelines is required and investment manager(s) will be required to submit monthly reports demonstrating compliance.

FWCIGA anticipates the total amount of externally managed funds to be managed pursuant to this RFP could be between \$25 million and \$200 million per manager. However, FWCIGA makes no explicit or implicit guarantee or warranty as to the amount of monies to be invested or the number of investment managers to be selected pursuant to this RFP.

In addition to the standard monthly reports, for financial statement preparation, FWCIGA requires monthly data reports containing holdings value at month end reported at cost, amortized cost and market value, accrued interest and monthly transactions (purchases, sales, maturities, etc.) in Excel or CSV format. Online access to these reports is preferable.

### **C. Terms of Contract**

Contracts for Investment Management will have a base term of three years, with two options to extend the contract for one-year each (totaling five years).

## **3. INSTRUCTIONS FOR RESPONDENTS**

### **A. Contact Information**

Questions related to the RFP and submission of proposals should be address to:

Liz Frisbie, Controller  
American Guaranty Fund Group  
PO Box 15159  
Tallahassee, FL 32317  
(850) 523-1820  
lfrisbie@agfgroup.org

### **B. Calendar of Events**

Listed below are the important actions and dates/times by which the actions must be taken or completed. All listed time are local time in Tallahassee, Florida (EST). Any change or modification to this calendar, modifications to this RFP, or other important notices will be disseminated to all prospective respondents.

| ACTION                          | DATE/TIME  |
|---------------------------------|--|
| Release of RFP                  | September 22, 2023   |
| Submission of written questions | October 6, 2023 – 5:00pm EST                                   |
| Response to written questions   | October 13, 2023   |
| Proposal due/opening            | October 20, 2023 – 5:00pm EST                                  |
| Proposal review completed       | November 10, 2023  |
| Selection/Award                 | Next regularly scheduled Board meeting after November 10, 2023 |

**C. Questions, Objections or Comments**

Respondents are required to carefully review this RFP without delay for any questions, objections or comments. Questions, objections or comments must be made in writing and received no later than the date and time reflected in the Calendar of Events above so that any necessary amendments may be published and distributed to all potential respondents. Questions shall be answered by FWCIGA in accordance with the Calendar of Events. However, FWCIGA, in its sole discretion, reserves the right to answer questions received after the deadline. All questions submitted shall be published and answered in a manner that all respondents will be able to view. Respondents shall not contact any other employee of AGFG for information with respect to this solicitation.

**D. Disclaimer**

FWCIGA assumes no responsibility for any interpretation or representations made by any of its officers, agents or employees unless interpretation or representations are incorporated in a written amendment to this RFP as outlined in 3C.

**E. Quantity & Delivery**

Deliver of a single copy of the proposal to the address above on or before the deadline. If remitting in hard copy, an electronic copy must also be remitted via CD or email on or before the due date. Proposals will be electronically date stamped whether received via hard copy or email and will not be opened until the due/opening date prescribed in the Calendar of Events. Proposals received in whole or in part after 5:00pm on October 20, 2023 will not be considered.

**F. Improper Delivery**

Neither the FWCIGA nor its officers, agents or employees shall be responsible for any proposal not properly addressed and identifies.

**G. Lobbying**

The RFP selection process shall not be compromised or distorted by private lobbying outside of the procedures designated to award the best proposal for the FWCIGA.

Respondents to this solicitation or person acting on their behalf may not contact, between the release of the solicitation and the 72-hour period following the FWCIGA Board's selection, excluding Saturdays, Sundays and holidays, any employee or officer of AGFG and its Board of Directors concerning any aspect of the solicitation documents. Violation of this provision may be grounds for rejecting a response.

A list of all Board of Directors and AGFG employees is available upon request.

After the proposals are opened, FWCIGA shall determine which proposals are deemed responsive and forward these proposals to the Investment Committee for evaluation. The Investment Committee and staff shall review the proposals and recommend a vendor(s) to the Board. The Board will then make the final determination and contract with the winning proposer(s). Any person/entity whose proposal is selected for further evaluation shall confine all contacts with the FWCIGA representatives to the responses to questions or interviews by FWCIGA Investment Committee and/or staff.

#### **4. PROPOSAL FORMAT**

This section prescribes the format in which the proposals are to be submitted. Additional information deemed appropriate by the respondent may be included, but **must** be placed within the relevant section. Additional tabs beyond those designated in this section will not be evaluated. The following paragraphs contain instructions that describe the required format for proposal, including limitations on the number of pages for select Tabs as noted below.

Proposals shall be limited to a page size of eight and one-half by eleven inches (8.5" x 11"). All proposals must contain the sections outlined below. These sections are called "Tabs." A "Tab", as used here, is a section separator, offset and labeled, (Example: "Tab 1, RFP Cover Sheet and Conflict of Interest Disclosure Form"), such that the evaluator can easily turn to the "Tabbed" sections during the evaluation process. FWCIGA is under no obligation to look for responsive information contained in incorrectly tabbed sections. If responsive information is also contained in other sections, respondents should specifically reference the tabbed section and corresponding page number(s) in which responsive information and documentation can be found. The following are the seven tabbed sections that must be in all Proposals.

- Tab 1 – RFP Cover Sheet and Conflict of Interest Disclosure Form
- Tab 2 – Firm Identification and Corporate Background
- Tab 3 – Company Profile
- Tab 4 – Scope of Services
- Tab 5 – References
- Tab 6 – Cost of Services
- Tab 7 – Litigation, Claim and Regulatory Action

## **5. PROPOSAL CONTENT**

The following items are to be provided by the respondents:

### **A. TAB 1 – RFP Cover Sheet and Conflict of Interest Disclosure Form**

**Complete and sign the Cover Sheet and Conflict of Interest Disclosure form (Exhibit “B”) and include under Tab 1.**

FWCIGA will not enter into an agreement with a respondent who has clients who may present a potential conflict of interest with FWIGA unless General Counsel advises that the conflict may be waived. In such case, FWCIGA will require the successful respondent to obtain an express waiver of conflict from said other client of respondent.

### **B. TAB 2 – Firm Identification and Corporate Background (5 page maximum)**

Please provide the following:

1. Full name, address and phone number of your organization
2. Date established
3. Legal structure of your firm, i.e. whether you operate as an individual partnership or corporation and provide a list of all affiliated entities
4. Brief history of your entity
5. Organization chart of your firm
6. SEC Registration information
7. Documentation supporting a minimum of \$1 million in general liability/errors and omissions insurance coverage

### **C. TAB 3 – Company Profile (6 page maximum)**

Provide information, requested below, that best describes the respondent’s company profile. Company overview is to include the following points:

1. Provide a detailed overview of your firm’s experience in investment management.
2. Describe the types of investment research and methodology your firm uses to make investment decisions.
3. Summarize the experience and tenure of your portfolio management team; provide a brief biography of all personnel who would be working on the FWCIGA account and any other key individuals who would participate, including licenses and/or certifications.
4. Include information about your firm’s Code of Ethics and whether or not you comply with the CFA (“Chartered Financial Analyst”) Code of Ethics.

5. If your firm is GIPS (“Global Investment Performance Standards”) compliant, please include this information in your response and include the last time GIPS compliance status has been verified.

**D. TAB 4 – Scope of Services (10 page maximum)**

Provide information that demonstrates Respondent’s capabilities to provide the services listed.

1. Provide current management philosophy, experience, and total assets under management by benchmark for all property and casualty insurance clients (if any).
2. Explain the steps your firm would take to ensure that FWCIGA’s objectives of principal presentation, liquidity and maximum yield are met.
3. Describe your portfolio construction process and propose a simulated portfolio of \$100 million of FWCIGA assets which complies with the attached FWCIGA Investment guidelines.
4. Provide a summary of assets under management over the last three years in tabular format:
  - Total assets under management; and
  - Total assets under management in which performance is measured against a benchmark identical, or substantially similar to, the FWCIGA benchmark in Section 2.B. Please specify the benchmark.
5. Provide historical performance for the following periods for all accounts which performance is measured against a benchmark identical, or substantially similar to, the FWCIGA benchmark in Section 2.B. Please specify the benchmark.
  - June 2023;
  - 3-month period ending June 30 (April – June 2023);
  - 1-year return for the period ending June 30, 2023;
  - 2-year return for the period ending June 30, 2023; and
  - 3-year return for the period ending June 30, 2023

**E. TAB 5 – References**

Provide a list of at least three (3) business/corporate references with the proposal. References from public sector and property and casualty insurance clients with fixed income portfolios are preferred. All references must have two or more year’s relationship with the respondent.

The references should include or contain

- A contact person, including their phone number and email address;
- Number of years of service with client;



- The type of portfolio managed, amount of money managed and relevant benchmark; inception date of the relationship, and the firm/agency name of the entity for which the services were provided; and
- A paragraph describing where services similar in magnitude and scope to those requested in the RFP were provided.

**F. TAB 6 – Cost of Services**

Proposal shall include pricing as defined below:

- Please propose an investment management fee in basis points for assets less than \$25 million, assets greater than \$25 million and less than \$50 million, assets greater than \$50 million and less than \$100 million and assets greater than \$100 million.

While cost is a key consideration, it will not be the factor in selecting a successful respondent.

**G. TAB 7 – Litigation, Claim and Regulatory Action**

FWCIGA will not score this section. However, the information will be used by FWCIGA in assessing respondent’s responsibility and may be grounds for disqualification or rejection.

Provide detailed information relating to the circumstances and status of:

- Any action, suit, proceeding or investigation before or by any state or federal court, agency or other authority currently pending against the respondent that threatens the existence or current stability of the respondent or its ability to provide any of the services.
- During the last five years, any matter in which the respondent, any control person, or any key personnel: (a) has been convicted, plead guilty, or plead no contest to any felony, or to misdemeanor involving dishonesty, breach of trust, or financial impropriety; (b) has had an insurance license, revoked by, or surrendered to, any insurance regulatory agency; (c) has been fined, penalized, sanctioned, or subject to any disciplinary action by any state or federal court, agency or other authority, self-regulatory organization, or professional organization, as a result of such person or entity’s activities in the business of insurance, securities, banking, investment banking, real estate, or other licensed profession.
- During the last five years, any litigation that respondent, any control person, or any key personnel has initiated against FWCIGA.

## **6. SELECTION PROCESS**

FWCIGA will conduct a comprehensive, fair, and impartial review and evaluation of all proposals meeting the requirements of this RFP using the selection criteria below. The evaluation committee will review the proposals and the Investment Committee will recommend a vendor(s) to the Board. The Board will then make the final determination and contract with the winning respondent(s). Contract negotiation will begin with the most qualified and suitable firm of demonstrated competence for professional services to determine whether an agreement can be reached. If an agreement cannot be reached, then FWCIGA may negotiate with the next most qualified and suitable firm. The final contract(s) will be submitted to the Executive Director for signature.

For the purpose of evaluation, scoring and ranking, proposals have been divided into seven categories. The following reflects the maximum number that may be awarded by category:

|       |   |                   |
|-------|---|-------------------|
| Tab 1 | Cover Sheet and Conflict of Interests   | Pass/Fail         |
| Tab 2 | Firm                                    | 10                |
| Tab 3 | Company Profile                         | 15                |
| Tab 4 | Scope of Service                        | 45                |
| Tab 5 | References                              | 5                 |
| Tab 6 | Cost of Services                        | 25                |
| Tab 7 | Litigation, Claim and Regulatory Action | Pass/Fail         |
|       | <b>Total Points</b>                     | <b>100 Points</b> |

## **7. RIGHT TO REJECT AND NOT AWARD**

FWCIGA may accept or reject any and all proposals or waive irregularities, and reserves the right not to award the contract when it is in the best interest of the FWCIGA to do so.

**EXHIBIT "A"**

**FLORIDA WORKERS' COMPENSATION INSURANCE GUARANTY ASSOCIATION**

**INVESTMENT POLICY (ADOPTED NOVEMBER 19, 2021)**



**FWCIGA**  
FLORIDA WORKERS' COMPENSATION  
INSURANCE GUARANTY ASSOCIATION

## Investment Policy

**Adopted by the Board of Directors**

**November 19, 2021**

# Statement of Investment Policy

## I. PURPOSE

The purpose of this statement is to outline a philosophy that will guide the investment management of the Assets toward the desired results. It is intended to be sufficiently specific to be meaningful, yet flexible enough to be practical. These policies are designed to ensure the prudent management of funds, the availability of operating and capital funds when needed, and an investment return competitive with comparable funds and financial market indices.

## II. SCOPE

This statement of investment policy is set forth by the Board of Directors (the "Board") and the Investment Committee of the Florida Workers' Compensation Insurance Guaranty Association ("FWCIGA") in order to:

1. Define and assign the responsibilities of all involved parties.
2. Establish a clear understanding for all involved parties of the investment goals and objectives for invested assets including cash (the "Assets").
3. Offer guidelines and limitations to all investment manager(s) regarding the investment of the Assets.
4. Establish a basis for evaluating investment results.
5. Establish the relevant average duration for which the Assets will be invested.

FWCIGA may choose to invest a portion of the Assets using its own internal staff and investment procedures approved by the Board (FWCIGA's "Internally Managed Funds"). Internally Managed Funds will consist of an amount of funds as determined by the Executive Director and approved by the Investment Committee which will assist in meeting the cash requirements of the FWCIGA. Internally Managed Funds may only be invested in:

- Bank accounts maintained by the FWCIGA;
- Money Market Mutual Funds rated AAA<sub>m</sub> by Standard and Poor's or Aaa by Moody's Investors Service;
- Certificate of Deposits (including CDARS) or any other bank instruments, to the extent such instruments are guaranteed by an agency or instrumentality of the United States Government (if all else is equal, preference will be given to Florida banks);
- The Florida Treasurer's Special Purpose Investment Account (SPIA), and
- Treasury or Agency securities.

The specific guidelines contained in the remainder of this document are applicable only to the Externally Managed Funds for which FWCIGA will utilize third-party professional investment manager(s) selected in a method consistent with applicable law and internal procurement policies.

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.

## III. INVESTMENT OBJECTIVES

FWCIGA is a nonprofit corporation created by the Florida Legislature in order to facilitate the payment of claims of insolvent workers' compensation insurers. Because of the nature of the risks to which the FWCIGA is exposed, the timing and amount of the claims is unpredictable. FWCIGA must be prepared to pay large amounts of claims quickly and without much warning. In order to meet this obligation, the primary investment objectives of the FWCIGA shall be liquidity and the preservation of capital, while earning a rate of return that is reasonable for FWCIGA's conservative investment parameters.

1. Liquidity - To provide sufficient liquidity to meet cash requirements of the FWCIGA.
2. Preservation of Capital - To minimize the probability of loss of principal over the investment horizon. If FWCIGA is called upon to pay claims quickly, it should be able to sell securities as needed and realize

proceeds approximately equal to amortized cost. Principal preservation is more important to FWCIGA than return maximization.

3. Return on Investment – Investment portfolios shall be designed with the objective of attaining a market rate of return throughout budgetary and economic cycles, taking into account the investment risk constraints and liquidity needs. Return on investment is of least importance compared to the liquidity and safety objectives described above. The core of investments is limited to relatively low risk securities in anticipation of earning a fair return relative to risk being assumed.

#### **IV. DUTIES AND RESPONSIBILITIES**

##### **A. DELEGATION OF AUTHORITY**

Responsibility for supervision of FWCIGA rests with the Board. The Board recognizes its responsibilities to adopt an investment policy and its option to delegate the responsibility to implement the policy to the Investment Committee.

The Investment Committee shall:

1. Recommend portfolio objectives and investment guidelines to the Board.
2. Periodically monitor performance of investments to ensure that objectives are being met and guidelines are being followed and report to the Board at each Board meeting.
3. Formally review the Investment Policy at least annually to assure continued relevance of the guidelines, objectives, financial status and capital markets' expectations as established in this statement of investment policy.
4. Direct the Executive Director to implement the established investment policy and report investment results to the Investment Committee, in the directed format, on at least a quarterly basis.

The Board may delegate certain responsibilities to professional experts in various fields. These may include, but are not limited to investment manager(s), custodian(s) and investment consultant/financial advisors.

Additional professionals such as attorneys, auditors, actuaries, and others may be engaged by the Investment Committee with the approval of the Board to assist in meeting its responsibilities and obligations to administer the Assets prudently. If such experts engaged are also deemed to be fiduciaries, they must acknowledge such in writing.

##### **B. INVESTMENT MANAGER(S)**

Each investment manager must acknowledge in writing its acceptance of responsibility as a fiduciary. Each investment manager will have full discretion to make all investment decisions for the Assets managed by the investment manager, while observing and operating within all policies, guidelines, constraints, and philosophies as outlined in this statement. Specific responsibilities of the investment manager(s) include:

1. Discretionary investment management including decisions to buy securities that fall within the investment guidelines, to sell or hold individual securities, and to alter asset allocation within the guidelines established in this statement.
2. Provide prior month investment performance results on or before the 10<sup>th</sup> calendar day of the following month.
3. Report exceptions as required below.
4. Communicating any major changes to economic outlook, investment strategy, or any other factors that affect the logistics or results of the investment process.
5. Informing the Board or Investment Committee regarding any material change to investment manager's organization: Examples include changes in portfolio management personnel, ownership structure or investment philosophy.
6. Voting proxies, if requested by the Board or Investment Committee, on behalf of the FWCIGA, and communicating such voting records on a timely basis.
7. Notify the Investment Committee Chair and Executive Director within five business days in the event a security's rating falls below this investment policy's requirements.

Investment managers must compile and report their investment performance at least quarterly to the Board and Investment Committee. Such reports must be prepared in accordance with Global Investment

Performance Standards ("GIPS") and should be presented in the format requested by FWCIGA. FWCIGA will measure the investment performance of the Assets against commonly accepted performance benchmarks on a quarterly basis and will use this measurement as one component of its evaluation of its investment manager(s). FWCIGA will also give consideration to the extent to which the investment process and results are consistent with the investment objectives, goals, and guidelines set forth in this statement.

The Board and Investment Committee reserve the right to terminate a manager for any reason including, but not limited to, the following:

1. Investment performance which is significantly less than anticipated given the discipline employed and the risk parameters established, or unacceptable justification of poor results.
2. Failure to adhere to any aspect of this statement of investment policy, including communication and reporting requirements.
3. Significant qualitative changes to the investment management organization.

The investment manager(s) will review with the FWCIGA, at least annually, all costs associated with the management of the Assets, including:

1. Expense ratios of each investment option against the appropriate peer group.
2. Custody fees: The holding of the Assets, collection of the income, and disbursement of payments.
3. Whether the manager is demonstrating attention to "best execution" in trading securities.

### **C. CUSTODIAN(S)**

Custodians are responsible for the safekeeping of the Externally Managed Funds. The specific duties and responsibilities of the custodian are to:

1. Maintain separate accounts by legal registration.
2. Value the holdings.
3. Collect all income and dividends generated by the Externally Managed Funds.
4. Settle all transactions (buy-sell orders) initiated by the investment manager(s).
5. Provide monthly reports that detail transactions, cash flows, securities held and their current value, and change in value of each security and the overall portfolio since the previous report.

### **D. INVESTMENT CONSULTANT(S)/FINANCIAL ADVISOR(S)**

The investment consultant/financial advisor's role is that of an independent advisor to the Board and Investment Committee for specific projects or engagements deemed necessary. Specific roles of the investment consultant/financial advisor may include:

1. Assisting in the development and periodic review of investment policy.
2. Conducting investment manager searches when engaged by the Board or Investment Committee.
3. Providing "due diligence", or research, on the investment manager(s).
4. Reviewing and assessing the performance of the investment manager(s) to provide the Board and Investment Committee with the ability to determine the progress toward the investment objectives.
5. Communicating matters of policy, manager research, and manager performance to the Board and Investment Committee.

## **V. STANDARDS OF PRUDENCE**

Any person or firm hired or retained to invest, monitor, or advise concerning these assets shall be held to the higher standard of "Prudent Expert". The standard shall be that in investing and reinvesting moneys and in acquiring, retaining, managing, and disposing of investments of these funds, the contractor shall exercise the judgment, care, skill, prudence, and diligence under the circumstances then prevailing, which persons of prudence, discretion, and intelligence, acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of the like character and with like aims by diversifying the investments of the funds, so as to minimize the risk, considering the probable income as well as the probable safety of their capital.

## VI. INVESTMENT GUIDELINES

### A. Allowable Assets

In general, the Assets will be invested only in high quality fixed income securities of limited duration as set forth below. Fixed Income Securities are securities that pay interest, dividends or distributions at a specified rate. The rate may be a fixed percentage of the principal or adjusted periodically. In addition, the issuer of a short-term fixed income security must repay the principal amount of the security, normally within a specified time. However, FWCIGA and its investment managers are not permitted to buy such fixed income securities to the extent that they require FWCIGA to be a Qualified Institutional Buyer, as defined by the United States Securities and Exchange Commission in Rule 144A under the Securities Act of 1933.

FWCIGA's intent is to have a diversified portfolio of fixed income securities that fall within the parameters described above. Individual securities, and the portfolio as a whole, must meet the credit quality, diversification, and duration restrictions outlined below. For a more detailed description of the portfolio securities, please see "Types of Permitted Securities" at Appendix A.

| Asset Type   | Minimum Rating<br>S&P /<br>Moody's /<br>Fitch | Portfolio Limits |                 | Individual Issuer Limit (%) | Maximum Maturity        |
|--|---|------------------|-----------------|-----------------------------|-------------------------|
|  |   | (Max) (%)        | (Min) (%)       |                             |                         |
| • U.S. Treasury Securities   | n/a   | 100%             | 25%<br>Combined | n/a                         | 5.50 Years              |
| • U.S. Agency Securities (Explicitly guaranteed by the federal government or supported by the full faith and credit of the U.S. Government)                                    | n/a   | 100%<br>Combined |                 | 35%                         | 5.50 Years              |
| • Government Sponsored Enterprises ("GSE") Senior Debt Only (Implicitly guaranteed by the federal government or supported by the full faith and credit of the U.S. Government) | n/a   |                  |                 | 35%                         | 5.50 Years              |
| • Supranational Agencies   | AAA / Aaa / AAA                               | 15%              |                 | 5%                          | 5.50 Years              |
| • Mortgage-backed securities (MBS) and Collateralized Mortgage Obligations (CMO) issued or guaranteed by a government agency or GSE.   | n/a   | 25%              |                 | 25%                         | 5.50 Years<br>Avg. Life |
| • Commercial Paper   | A-1 / P-1 / F1                                | 30%              |                 | 5%                          | 270 Days                |
| • Banker's Acceptance (BAs) or Certificates of Deposit (CDs)   | A-1 / P-1 / F1                                | 25%              |                 | 5%                          | 1 year                  |
| • Cash and Cash Equivalents  | n/a   | 100%             | 5% *            | n/a                         | N/A                     |
| • Money Market Funds   | AAA <sub>m</sub> / Aaa / AAA                  | 25%              |                 | 5%                          | N/A                     |



|  |                    |           |  |    |                         |
|--|--------------------|-----------|--|----|-------------------------|
| • State and local governments  | A- / A3 / A-       | 25%       |  | 5% | 5.5 Years               |
| • Corporate obligations  | A- / A3 / A-<br>** | 50%<br>** |  | 5% | 5.5 Years               |
| • Repurchase Agreement collateralized at a minimum of 102% with U.S. Treasury or U.S. Agency Securities and marked-to-market daily | n/a                | 15%       |  | 5% | 1 Year                  |
| • Asset Backed Securities  | AAA / Aaa / AAA    | 15%       |  | 5% | 5.50 Years<br>Avg. Life |

\* 5% minimum includes cash, cash equivalents, including money market funds or U.S. Treasury bills, or securities with maturities of 3 months or less.

\*\* 10% of the portfolio may be allocated to corporate notes rated BBB+/Baa1/BBB+ as long as the security is rated at least A-/A3/A- by one Nationally Recognized Statistical Rating Organization.

#### **B. CREDIT QUALITY**

Minimum ratings reflect the security rating by two of three Nationally Recognized Statistical Rating Organizations (S&P / Moody's / Fitch) at the time of purchase. FWCIGA investments must be fully compliant with the requirements of this Policy at the date of acquisition and continually monitored for compliance subsequent to acquisition. In the event a security's rating falls below this Investment Policy's requirements, the investment manager must notify the Investment Committee Chair and Executive Director within five business days of such a decline in rating. The Investment Committee Chair and Executive Director will consult with the investment manager and staff to assess the individual facts and circumstances of the deviation and determine an appropriate course of action. Following such determination, the Investment Committee members will be notified of the action taken and a report on any such deviations will be reviewed at the next Committee and/or Board meeting.

#### **C. LIQUIDITY AND MATURITIES**

To minimize the possibility of a loss occasioned by the sale of a security forced by the need to meet a required payment, the Executive Director will periodically provide investment managers with an estimate of expected net cash flow. The Executive Director will notify the investment managers in a timely manner, to allow sufficient time to build up necessary liquid reserves. The investment policy should direct that an attempt will be made to match investment maturities with known cash needs and anticipate cash flow requirements.

To maintain the ability to deal with unplanned cash requirements that might arise, the Investment Committee requires that a minimum of 5% of the Assets under each investment managers shall be maintained in cash, cash equivalents, including money market funds or U.S. Treasury bills, or securities with maturities of 3 months or less. Additional liquidity may also be maintained by the Executive Director via Internally Managed Funds as directed by the Board.

Fixed income maturity restrictions are as follows:

- Maximum maturity/average life for any single security is 5.50 years. The maturity of mortgaged-backed securities (MBS) shall be considered the date corresponding to its weighted average life. Weighted average life is the average number of years that each dollar of the unpaid principal due on the mortgage remains outstanding. The weighted average life may be different from the stated legal maturity included in a security's description.
- Dollar weighted average portfolio duration should not exceed 2.5 years.
- Commercial Paper maturity should not exceed 270 days.
- Bankers Acceptances (BA) or Certificate of Deposit (CD) maturities should not exceed 1 year.
- Repurchase Agreement maturities should not exceed 1 year.

#### **D. PROHIBITED ASSETS AND TRANSACTIONS**

Prohibited investments include, but are not limited to the following:

1. Options
2. Limited Partnerships
3. Venture-Capital Investments
4. Real Estate Properties
5. Interest-Only (IO), Principal-Only (PO), and Residual Tranche CMOs
6. Auction Rate Securities
7. Mortgage-backed Securities (excluding Agency or GSE MBS) or Collateralized Debt Obligations
8. Derivatives
9. Any and all security types not explicitly listed in this Policy unless approved in writing by the Board.

Prohibited transactions include, but are not limited to the following:

1. Short Selling
2. Margin Transactions
3. Securities lending
4. Reverse repurchase agreements
5. TBA rolls
6. Any and all transactions substantially similar, or used as an alternative to the above, unless approved in writing by the Board.

#### **E. EVALUATION AND BENCHMARK**

FWCIGA will measure the performance of its portfolio and the performance of each investment manager from various perspectives:

- (i) the portfolio will be measured regularly for compliance with this policy;
- (ii) the portfolio will be analyzed for return performance by comparing the investment managers' performance to each other on a regular basis;
- (iii) the portfolio's performance will be compared to various industry benchmarks – or blends of benchmarks – on a regular basis.

The purpose of using any benchmarks as performance measurement tools is not to guide investment selection – the investment managers' professional judgment, operating within the specific guidelines and restrictions of this policy is meant to be the determinant of investment selection. Rather FWCIGA will use any benchmarks to measure overall performance of the investment managers. The investment managers must provide reports to FWCIGA on a monthly basis that enables FWCIGA to understand specifically how the portfolio is being invested so this performance analysis can be done. FWCIGA intends to use the following benchmarks in its performance evaluation. Benchmarks are used for comparison purposes as there is no exact match for the FWCIGA investment guidelines.

- Merrill Lynch 1-3 Year U. S. Government and Corporate A rated and above Index
- Merrill Lynch 1-5 Year U. S. Government and Corporate A rated and above Index

In addition to performance and compliance reporting, the investment managers must regularly stress-test the portfolio and report quarterly to FWCIGA the portfolio's ability to meet various levels of credit risk, (i.e.: ratings downgrade of all corporate securities by one notch (A+/A1 to A/A2), redemptions of all securities within 30 days, and interest rate changes of  $\pm 25$  and  $\pm 50$  basis points for all securities.

## **APPENDIX A – TYPES OF PERMITTED SECURITIES**

### **ASSET BACKED SECURITIES**

Asset Backed Securities are fixed income securities issued by a special purpose entity and backed by a specific pool of assets. The assets are usually in the form of self-liquidating financial assets (e.g. loans, leases, receivables). ABS usually have additional credit support, such as over-collateralization, subordinated support tranches, excess coupon income, lines of credit or guarantees. This policy does not permit the purchase of securities such as CDOs or CLOs or securities where the underlying collateral is comprised of derivatives.

### **CORPORATE DEBT SECURITIES**

Corporate Debt Securities are fixed income securities issued by businesses. Notes, bonds, debentures and commercial paper are the most prevalent types of corporate debt securities.

### **COMMERCIAL PAPER**

Commercial Paper is an issuer's obligation with a maturity of less than 270 days. Companies typically issue commercial paper to pay for current expenditures. Most issuers constantly reissue their commercial paper and use the proceeds (or bank loans) to repay maturing paper. If the issuer cannot continue to obtain liquidity in this fashion, its commercial paper may default.

### **BANK INSTRUMENTS**

Bank Instruments are unsecured interest bearing deposits with banks. Bank instruments include, but are not limited to, bank accounts, Time Deposits, Certificates of Deposit and Banker's Acceptances.

Neither FWCIGA nor its investment managers may invest in instruments of domestic banks or savings and loans unless (i) the bank has capital and surplus over \$100 million; or (ii) the principal amount of the instrument is insured by the Deposit Insurance Fund administered by the Federal Deposit Insurance Corporation either directly or as part of CDARS (Certificate of Deposit Account Registry Service) program.

### **U.S. TREASURY SECURITIES**

U.S. Treasury Securities are direct obligations of the federal government and are backed by the full faith and credit of the United States. There are four types of U.S. Treasury Securities: Treasury Bills, Treasury Notes, Treasury Bonds and Treasury Inflation Protected Securities. Treasury Bills (T-Bills) are issued at a discount (no coupon payments) and have maturities of 28, 91, 182, and 364 days. Treasury Notes (T-Notes) have maturities of two (2) to ten (10) years with six month coupon payment intervals. Treasury Bonds (T-Bonds) have maturities of ten (10) to thirty (30) years with six month coupon payment intervals. Treasury Inflation Protected Securities (TIPS) are inflation indexed bonds with principal adjusted to the Consumer Price Index to protect against inflation.

### **AGENCY SECURITIES AND GOVERNMENT SPONSORED ENTITY SECURITIES**

Agency Securities are issued or guaranteed by a federal agency or other Government-Sponsored Entity (GSE) acting under federal authority. Some GSE securities are explicitly guaranteed or supported by the full faith and credit of the United States and other GSE securities are implicitly supported through federal subsidies, loans, or other benefits.

#### **Explicitly Guaranteed by Federal Government**

The following securities are supported by the full faith and credit of the United States, but are not limited to, securities issued by the Government National Mortgage Association, Small Business Administration, Financial Assistance Corporation, Farmer's Home Administration, Federal Financing Bank, General Services Administration, Department of Housing and Urban Development, Export-Import Bank, Overseas Private Investment Corporation, and Washington Metropolitan Area Transit Authority.

#### **Implicitly Guaranteed by Federal Government (senior debt only)**

The following GSE securities receive support through federal subsidies, loans, or other benefits, for example, the U.S. Treasury is authorized to purchase specified amounts of securities issued by (or otherwise make funds available to) the Federal Home Loan Bank System, Federal Home Loan Mortgage Corporation, Federal National Mortgage Association, and Tennessee Valley Authority in support of such obligations.

A few other GSE securities have no explicit financial support, but are regarded as having support because the federal government sponsors their activities. These include securities issued by the Farm Credit System, Financing Corporation, and Resolution Funding Corporation.

### **MUNICIPAL SECURITIES**

Municipal securities are issued by states, counties, cities, and other political subdivisions and authorities.

### **MONEY MARKET MUTUAL FUNDS**

Money Market mutual funds are registered investment companies that comply with rule 2a7 of the Investment Company Act of 1940. A thorough investigation of the fund is required prior to investing, and on a continual basis.

The following questionnaire must be answered:

1. What are the eligible investment securities, and what is are investment policy and objectives?
2. How is interest calculated and how it is distributed, and how are gains and losses treated?
3. How are the securities safeguarded (including the settlement processes), and how often the securities are priced and the program audited?
4. Who may invest in the program, how often, what size deposit and withdrawal are allowed?
5. A schedule for receiving statements and portfolio listings?
6. Are reserves, retained earnings, etc. utilized by the pool/fund?
7. What is the fee schedule, and when and how is it assessed?
8. Is the pool/fund eligible for bond proceeds and/or will it accept such proceeds?

### **MORTGAGE BACKED SECURITIES**

Agency Mortgage Backed Securities (MBS) investments are limited to pass-through and agency issued collateralized mortgage obligations (CMO) securities issued by the Government National Mortgage Association (GNMA), Federal National Mortgage Association (FNMA) and the Federal Home Loan Mortgage Corporation (FHLMC). GNMA is a U.S. Government Agency security while FNMA and FHLMC are GSE's. Allowable MBS investments do not include interest-only or principal-only collateralized mortgage obligations (CMO), private label or other types of MBS.

### **REPURCHASE AGREEMENTS (REPOs)**

Repurchase Agreements are a form of short-term borrowing often used by broker- dealers. The dealer sells securities to investors, and buys them back at an agreed upon price on an agreed upon day. For the party selling the security (and agreeing to repurchase it in the future) it is a repo.

Repurchase Agreements are permitted for use by FWCIGA when transacted with any registered broker/dealer or any domestic commercial bank whose unsecured long-term debt obligations are rated at least "A2" by Moody's and "A" by S&P without regard to gradation. In addition, (a) a specific written repurchase agreement must govern the transaction, (b) the securities must be held free and clear of any lien, by the Indenture Trustee or an independent third party acting solely as agent for the Indenture Trustee, and (c) such party must be a member of the Federal Deposit Insurance Corporation and which has combined capital, surplus and undivided profits of not less than \$100 million, and the Indenture Trustee must have received written confirmation from such third party that it holds such securities, free and clear of any lien, as agent for the Indenture Trustee.

Any Repurchase Agreement must be collateralized at least 102% with U.S. Government or Agency securities, excluding Mortgage Backed Securities. All Repurchase Agreements must be marked-to-market daily.

### **SUPRANATIONAL AGENCIES**

Supranational agencies are a multinational union where governance and ownership is shared by multiple nations. The country risk is defined as Supranational. Issuers within the supranational sector are of high credit quality due to the backing of multiple governments. Supranational agencies have often been organized to fulfill a mission in a specific part of the world. Supranational security investments are limited to those securities in which the U.S. is a shareholder and voting member.

## **APPENDIX B - GLOSSARY**

**AGENCIES:** Federal agency securities and/or Government-sponsored enterprises. **ASKED:** The price at which securities are offered.

**BANKERS' ACCEPTANCE (BA):** A draft or bill or exchange accepted by a bank or trust company. The accepting institution guarantees payment of the bill, as well as the issuer.

**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. (When you are selling securities, you ask for a bid.) See Offer.

**BROKER:** A broker brings buyers and sellers together for a commission.

**CERTIFICATE OF DEPOSIT (CD):** A time deposit with a specific maturity evidenced by a Certificate. Large-denomination CD's are typically negotiable.

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

**COUPON:** (a) The annual rate of interest that a bond's issuer promises to pay the bondholder on the bond's face value. (b) A certificate attached to a bond evidencing interest due on a payment date.

**DEALER:** A dealer, as opposed to a broker, acts as a principal in all transactions, buying and selling for his own account.

**DEBENTURE:** A bond secured only by the general credit of the issuer.

**DELIVERY VERSUS PAYMENT:** There are two methods of delivery of securities: delivery versus payment and delivery versus receipt. Delivery versus payment is delivery of securities with an exchange of money for the securities. Delivery versus receipt is delivery of securities with an exchange of a signed receipt for the securities.

**DISCOUNT:** The difference between the cost price of a security and its maturity when quoted at lower than face value. A security selling below original offering price shortly after sale also is considered to be at a discount.

**DISCOUNT SECURITIES:** Non-interest bearing money market instruments that are issued a discount and redeemed at maturity for full face value, e.g., U.S. Treasury Bills.

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

**FEDERAL CREDIT AGENCIES:** Agencies of the Federal government set up to supply credit to various classes of institutions and individuals, e.g., S&L's, small business firms, students, farmers, farm cooperatives, and exporters.

**FEDERAL DEPOSIT INSURANCE CORPORATION (FDIC):** A federal agency that insures bank deposits, currently up to \$100,000 per deposit.

**FEDERAL FUNDS RATE:** The rate of interest at which Fed funds are traded. This rate is currently pegged by the Federal Reserve through open-market operations.

**FEDERAL HOME LOAN BANKS (FHLB):** Government sponsored wholesale banks (currently 12 regional banks), which 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 NATIONAL MORTGAGE ASSOCIATION (FNMA):** FNMA, like GNMA 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.

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

**FEDERAL RESERVE SYSTEM:** The central bank of the United States created by Congress and consisting of a seven member Board of Governors in Washington, D.C., 12 regional banks and about 5,700 commercial banks that are members of the system.

**GOVERNMENT NATIONAL MORTGAGE ASSOCIATION (GNMA or Ginnie Mae):** Securities influencing the volume of bank credit guaranteed by GNMA and issued by mortgage bankers, commercial banks, savings and loan associations, and other institutions. Security holder is protected by full faith and credit of the U.S. Government. Ginnie Mae securities are backed by the FHA, VA or FmHA mortgages. The term "pass-throughs" is often used to describe Ginnie Maes. **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—reverse 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.

**MONEY MARKET:** The market in which short-term debt instruments (bills, commercial paper, bankers' acceptances, etc.) are issued and traded. **OFFER:** The price asked by a seller of securities. (When you are buying securities, you ask for an offer.) See Asked and Bid.

**OPEN MARKET OPERATIONS:** Purchases and sales of government and certain other securities in the open market by the New York Federal Reserve Bank as directed by the FOMC in order to influence the volume of money and credit in the economy. Purchases inject reserves into the bank system and stimulate growth of money and credit; sales have the opposite effect. Open market operations are the Federal Reserve's most important and most flexible monetary policy tool.

**PORTFOLIO:** Collection of securities held by an investor.

**PRIMARY DEALER:** A group of government securities dealers who submit daily reports of market activity and positions and monthly financial statements to the Federal Reserve Bank of New York and are subject to its informal oversight. Primary dealers include Securities and Exchange Commission (SEC)-registered securities broker-dealers, banks, and a few unregulated firms.

**QUALIFIED PUBLIC DEPOSITORIES:** A financial institution which does not claim exemption from the payment of any sales or compensating use or ad valorem taxes under the laws of this state, which has segregated for the benefit of the commission eligible collateral having a value of not less than its maximum liability and which has been approved by the Public Deposit Protection Commission to hold public deposits.

**RATE OF RETURN:** The yield obtainable on a security based on its purchase price or its current market price. This may be the amortized yield to maturity on a bond the current income return.

**REPURCHASE AGREEMENT (RP OR 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 RP extensively to finance their positions. Exception: When the Fed is said to be doing RP, 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.

**SECONDARY MARKET:** A market made for the purchase and sale of outstanding issues following the initial distribution.

**SECURITIES & EXCHANGE COMMISSION:** Agency created by Congress to protect investors in securities transactions by administering securities legislation. SEC RULE 15C3-1: See Uniform Net Capital Rule.

**STRUCTURED NOTES:** Notes issued by Government Sponsored Enterprises (FHLB, FNMA, SLMA, etc.) and Corporations, which have imbedded options (e.g., call features, step-up coupons, floating rate coupons, and derivative-based returns) into their debt structure. Their market performance is impacted by the fluctuation of interest rates, the volatility of the imbedded options and shifts in the shape of the yield curve. **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 three months, six months, or one year. **TREASURY**

**BONDS:** Long-term coupon-bearing U.S. Treasury securities issued as direct obligations of the U.S. Government and having initial maturities of more than 10 years.

**TREASURY NOTES:** Medium-term coupon-bearing U.S. Treasury securities issued as direct obligations of the U.S. Government and having initial maturities from two to 10 years.

**UNIFORM NET CAPITAL RULE:** Securities and Exchange Commission requirement that member firms as well as nonmember broker-dealers in securities maintain a maximum ratio of indebtedness to liquid capital of 15 to 1; also called net capital rule and net capital ratio. Indebtedness covers all money owed to a firm, including margin loans and commitments to purchase securities, one reason new public issues are spread among members of underwriting syndicates. Liquid capital includes cash and assets easily converted into cash.

**YIELD:** The rate of annual income return on an investment, expressed as a percentage. (a) **INCOME YIELD** is obtained by dividing the current dollar income by the current market price for the security. (b) **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.

**EXHIBIT "B"**

**AMERICAN GUARANTY FUND GROUP, INC. CONFLICT OF INTEREST FORM**





### Vendor Conflict of Interest Disclosure Form

All Vendors should be aware that the entities listed above have a Conflict of Interest and Ethics Policy which prohibits employees and Board members from having certain relationships with persons or entities conducting (or proposing to conduct) business with any of the entities and which prohibits the acceptance of gifts from Vendors. If a vendor has a disclosable relationship the Vendor should disclose any Conflict of Interest or potential Conflict of Interest that may exist. A disclosable relationship would include:

- Knowingly employing an employee, board member or family member of any entity listed above
- Knowingly allowing an employee, board member or family member to own or have a material personal financial interest (directly or indirectly) in the Vendor of any entity listed above
- Knowingly engaging in a material personal business transaction with an employee, board member or family member of any entity listed above.

I hereby certify that the Vendor referenced below does not have a potential conflict of interest with an employee, board member or family member of any of the entities listed above:

\_\_\_\_\_  
Name

Or

I hereby certify that the Vendor referenced below DOES have a potential conflict of interest with an employee, board member or family member of any of the entities listed above:

\_\_\_\_\_  
Name

If there is a potential conflict of interest, please provide the following information:

List the name(s) of the employee or board member with whom there may be a conflict of interest:

\_\_\_\_\_

Briefly describe the nature of the potential conflict of interest: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

VENDOR Name: \_\_\_\_\_

FEIN: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_