

WEST PALM BEACH POLICE PENSION FUND

2100 North Florida Mango Road
West Palm Beach, Florida 33409

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May 8, 2020

State of Florida, Department of Management Services
Division of Retirement
Municipal Police Officers' & Firefighters' Trust Funds Office
Keith E. Brinkman
Bureau Chief, Local Retirement Systems
3189 S. Blair Stone Rd.
Tallahassee, FL 32301-6812

Re: Investment Guidelines

Dear Mr. Brinkman:

I would like to take this opportunity to present you with the Investment Policy/Guidelines for the City of West Palm Beach Police Pension Fund. This is being provided in accordance with Section 112.661, Florida Statutes. The Board of Trustees unanimously approved these amendments on May 8, 2020.

Should you have any questions or concerns, kindly contact me at the phone number cited above. Thank you in advance for your time and attention in this matter.

Respectfully,



David M. Williams, Plan Administrator

FOR THE BOARD

c: Board of Trustees
State of Florida (*file*)
City of West Palm Beach, City Clerk's Office (via e-mail: cityclerk@wpb.org)

West Palm Beach Police Pension Fund

Investment Policy Guidelines

Amended May 2020

I. FOR ALL INVESTMENT MANAGERS

Purpose of Investment Policy Statement

The Pension Board Trustees maintain that an important determinant of future investment returns is the expression and periodic review of the Fund's Investment objectives. To that end, the Trustees have adopted this statement of Investment Policy.

In fulfilling their fiduciary responsibility, the Trustees recognize that the retirement system is an essential vehicle for providing income benefits to retired participants or their beneficiaries. The Board also recognizes that the obligations of the Fund are long-term and that investment policy should be made with a view toward performance and return over a number of years. The general investment objective, then, is to obtain a reasonable total rate of return - defined as interest and dividend income plus realized and unrealized capital gains or losses - commensurate with the Prudent Investor Rule and any other applicable statute.

A reasonably consistent and adequate return, protection of the assets against the inroads of inflation and safety of the assets are paramount. However, the volatility of interest rates and securities markets make it necessary to judge results within the context of several years rather than over short periods of one or two years or less. Performance will be measured quarterly.

II. INVESTMENT PERFORMANCE OBJECTIVES - QUARTERLY EVALUATION

A. The Total Fund

Beginning October 1, 2014, the performance of the portfolio will be compared to the return of a portfolio comprised of 26% of the S&P500 Index, 10% Russell 2000 Small Cap Index (R2000), 8% Russell MidCap Index, 8% Russell 2500, 10% MSCI EAFE Index (EAFE), 10% NCREIF Real Estate Index, 3% of the MSCI Emerging Market Index and 25% of the Barclays Capital Intermediate Aggregate Bond Index (BCIAB).

Beginning October 1, 2016, the performance of the portfolio will be compared to the return of a portfolio comprised of 26% of the S&P500 Index, 10% Russell 2000 Small Cap Index (R2000), 8% Russell MidCap Index, 8% Russell 2500, 10% MSCI EAFE Index (EAFE), 13% NCREIF Real Estate Index, 3% of the MSCI Emerging Market Index and 22% of the Barclays Capital Intermediate Aggregate Bond Index (BCIAB).

Beginning January 1, 2019, the performance of the portfolio will be compared to the return of a portfolio comprised of 14-20% of the S&P500 Index, 10% Russell 2000 Small Cap Index (R2000), 10% Russell MidCap

Index, 10% Russell 2500, 10% MSCI EAFE Index (EAFE), 14% NCREIF Real Estate Index, 4% of the MSCI Emerging Market Index, 0-6% the LPX MM Private Equity Index ETF and 22% of the Barclays Capital Intermediate Aggregate Bond Index (BCIAB).

Beginning July 1, 2019, the performance of the portfolio will be compared to the return of a portfolio comprised of 14-20% of the S&P500 Index, 10% Russell 2000 Small Cap Index (R2000), 15% Russell MidCap Index, 5% Russell 2500, 10% MSCI EAFE Index (EAFE), 14% NCREIF Real Estate Index, 4% of the MSCI Emerging Market Index, 0-6% the LPX MM Private Equity Index ETF and 22% of the Barclays Capital Intermediate Aggregate Bond Index (BCIAB).

Beginning July 1, 2020, the performance of the portfolio will be compared to the return of a portfolio comprised of 9-20% of the S&P500 Index, 10% Russell 2000 Small Cap Index (R2000), 15% Russell MidCap Index, 5% Russell 2500, 10% MSCI EAFE Index (EAFE), 14% NCREIF Real Estate Index, 4% of the MSCI Emerging Market Index, 0-6% the LPX MM Private Equity Index ETF, 0-5% of the HRFI Fund of Funds Composite Index and 22% of the Barclays Capital Intermediate Aggregate Bond Index (BCIAB).

The Consultant will adjust the asset allocation to the S&P500, the Private Equity Indices and **the HRFI Fund of Funds Composite Index** as the Capital Calls are raised.

B. Total Equity Portfolio

Beginning October 1, 2007, the performance of the total equity portfolio will be compared to the return of a portfolio comprised of 44.6% S&P500, 15.4% R2000, 24.6% S&P400 & 15.4% EAFE.

Beginning July 1, 2010, the performance of the total equity portfolio will be compared to the return of a portfolio comprised of 40% S&P500, 15.4% R2000, 24.6% Russell MidCap, 4.6% NCREIF & 15.4% EAFE.

Beginning October 1, 2011, the performance of the total equity portfolio will be compared to the return of a portfolio comprised of 45% S&P500, 15% R2000, 25% Russell MidCap, & 15% EAFE.

Beginning January 1, 2013, the performance of the total equity portfolio will be compared to the return of a portfolio comprised of 40% S&P500, 15% R2000, 25% Russell MidCap, 15% EAFE & 5% MSCI Emerging Markets Index.

Beginning October 1, 2014, the performance of the total equity portfolio will be compared to the return of a portfolio comprised of 40% S&P500, 15% R2000, 12.5% Russell MidCap, 12.5% Russell 2500, 15% EAFE & 5% MSCI Emerging Markets Index.

Beginning January 1, 2019, the performance of the total equity portfolio will be compared to the return of a portfolio comprised of 22-30% S&P500, 16% R2000, 16% Russell MidCap, 16% Russell 2500, 16% EAFE, 6% MSCI Emerging Markets & 0-8% LPX MM Private Equity Index.

Beginning July 1, 2019, the performance of the total equity portfolio will be compared to the return of a portfolio comprised of 22-30% S&P500, 16% R2000, 24% Russell MidCap, 8% Russell 2500, 16% EAFE, 6% MSCI Emerging Markets & 0-8% LPX MM Private Equity Index.

C. Total Fixed Income Portfolio

Beginning October 1, 2007, the performance of the total fixed income portfolio will be compared to the return of a portfolio comprised of 100% BCAB Index. Beginning April 1, 2011, the performance of the total fixed income portfolio will be compared to the return of a portfolio comprised of 100% BCIAB Index.

D. Total Alternative Asset Portfolio

Beginning October 1, 2011, the performance of the Real Estate portfolio will be compared to the return of a portfolio comprised of 100% NCREIF Index.

The EnTrustPermal WPB Special Opportunities Fund portion of the portfolio is expected to perform at a rate at least equal to the HRFI Fund of Funds Index.

E. Total Private Equity Portfolio

Beginning January 1, 2019, the performance of the Private Equity portfolio will be compared to the return of a portfolio comprised of 100% the LPX MM Private Equity Index ETF.

Subsequently, this will be further broken down as follows:

Aberdeen Standard Investments will be compared to the S&P500+5%;

JP Morgan PEG Global Private Equity VII L.P. will be compared to the MSCI World Equity Index.

Taurus Private Markets will be compared to the Russell 3000 plus 3% (R3000+3%) with a 1 quarter lag time, beginning April 1, 2020.

III. AUTHORIZED INVESTMENTS

A. Equity Investments

1. Time, savings and money market deposit accounts of a national bank, a state bank or a savings and loan association insured by the Federal Deposit Insurance Corporation provided the amount deposited does not exceed the insured amount.
2. Money Market obligations issued by the U.S. Government, or in obligations guaranteed as to principal and interest by the United States Government or in obligations guaranteed as to principal and interest by the United States Government agency. All money market issues must rank as either Standard & Poor's A1, or Moody's P1.
3. Domestic and International Equities: equities defined as common stocks and issues convertible to equities, provided:
 - a. Each holding shall be listed on a major U.S. exchange (except for the International Equity manager who may also purchase over-the-counter (OTC) securities and securities listed on foreign exchanges).
 - b. Not more than five percent (5%) of the Fund's assets shall be invested in the common stock or capital stock of any one issuing company, nor shall the aggregate investment in any one issuing company exceed five percent (5%) of the outstanding capital stock of the company.
 - c. Not more than ten percent (10%) of any manager's Total Fund portfolio, at market value, shall be invested in foreign securities. The manager must immediately notify the Board and the Consultant when the international exposure reaches ten percent (10%). An explanation will be needed as to why the manager is changing their discipline.
4. The use of unhedged and/or leveraged derivatives will not be allowed in any form.

B. Fixed Income Investments

1. Time, savings and money market deposit accounts of a national bank, a state bank or a savings and loan association insured by the Federal Deposit Insurance Corporation provided the amount deposited does not exceed the insured amount.
2. Obligations issued by the U.S. government or an agency or instrumentality of the U.S. government, including mortgage-related securities, or foreign bonds or other evidence of indebtedness denominated in United States Dollars. The U.S. government securities which may be purchased include direct obligations issued by the United States Treasury, such as Treasury bills, certificates on indebtedness, notes and bonds as well as instruments issued or guaranteed by agencies or instrumentalities of the United States government, including mortgage-related securities. Mortgage-related securities or asset-backed securities not issued by the U.S. government or an agency or instrumentality thereof may also be purchased.
3. Fixed income investments defined as preferred issues and fixed income securities provided:
 - a. All corporate debt issues shall be rated in the highest three (3) categories of quality by any of the following listed services: Moody's, Standard and Poors or Fitch's Manual. Any issue which is downgraded to investment grade (the fourth (4th) category) may be held.

Any issue which is downgraded below investment grade by two (2) of the three (3) above mentioned ratings services must either be sold or specifically approved for retention by the Board.
4. Money market funds, defined as fixed income securities having a maturity of less than one year; provided:
 - a. All issues shall meet or exceed Standard & Poor's A1, or Moody's P1 credit rating.
5. The use of unhedged and/or leveraged derivatives will not be allowed in any form.

C. Real Estate Investments

Investments in direct real estate investment partnerships may be used to diversify the Pension Fund's Total Portfolio and to enhance total return. These investments may be in open end limited partnership funds or closed end limited partnership funds. It is understood that open end funds offer more liquidity than illiquid closed end funds, but both types of investments are long-term, private partnerships with high variability of returns.

D. Limitations

1. No limitations are placed on percentage commitments to fixed income or money market investments.
2. Not more than twenty-five percent (25%) of the Fund's total assets, at market value, shall be invested in foreign securities.
3. In accordance with the Protecting Florida's Investment Act (Fla. Stat. 215.473), the Board is prohibited from directly investing in any companies, identified by the State Board of Administration (SBA) on its website each quarter, as a scrutinized company. The investment Consultant and each investment manager shall review its investments each quarter to determine whether it is required to sell, redeem, divest or withdraw any publicly traded security of a company identified by the SBA as a scrutinized company and shall notify the Board each quarter, in writing, of the results of its review. Beginning no later than January 1, 2010, the Board shall sell, redeem, divest or withdraw all publicly traded securities it holds in any scrutinized company by no later than September 30, 2010 for Chapter 185 plans.

IV. COMMUNICATIONS

- A. It shall be incumbent upon the investment managers and the custodian to apprise the Trustees of all transactions. On a monthly basis each manager shall supply an accounting statement which will include a summary of all receipts and disbursements, the cost and the market value of all assets and the percentage of the fund invested in equities, fixed income and money market at cost. On a quarterly basis each manager shall provide an analysis of the quality of the assets, including the quality rating of each security held, a summary of common stock diversification and attendant schedules. In addition, each manager shall deliver each quarter a report detailing the fund's performance, adherence to the investment policy, forecast of the market and economy, portfolio analysis and current assets of the Trust. Written reports shall be provided to the Trustees at the quarterly meetings. Each manager will provide immediate written and telephone notice to the Trustees and the performance monitor of any significant market related or non-market related event. The Trustees have retained a monitoring service to evaluate and report on a quarterly basis the rate of return and relative performance of the fund.

- B. Meetings: The Trustees will meet quarterly with the monitoring service's representative to review the performance report. At least annually, the Trustees will meet with each investment manager and appropriate outside consultants to discuss performance results, economic outlook, investment strategy and tactics and other pertinent matters affecting the Fund.
- C. The Managers will immediately disclose any securities owned in the past or presently held securities which are not in compliance with Section III.
- D. The Manager's quarterly report will list separately any security whose value has diminished twenty-five percent (25%) or more from the purchase price.
- E. The Managers shall report to the Trustees on an annual basis how each proxy was voted, the issue as to each, and the date the proxy was voted. If a proxy was not voted, the Manager shall provide a written statement indicating the reason that particular proxy was not voted.
- F. The Trustees may wish to recapture as many of their commission dollars as possible consistent with obtaining the "best execution" as defined in ERISA Technical Release 96-1 which is made part of this agreement by reference.
- G. When there is any change in ownership of the investment management firm, the new firm will provide the Trustees with an audited balance sheet and will keep the Trustees fully informed of all material events. This is to include, but not be limited to, the loss of any clients, deterioration of the financial health of the firm and all employment contracts.

V. CRITERIA FOR INVESTMENT MANAGER REVIEW

The Board wishes to adopt standards by which judgments on the ongoing performance of a portfolio manager may be made. In this regard, the following will be closely monitored:

1. Four consecutive quarters of total fund performance below the fiftieth (50th) percentile in manager rankings.
2. Loss by the Manager of any senior investment personnel.
3. Any change in basic investment philosophy by the Manager.
4. Failure to attain a 60% vote of confidence by the Board members.

The above criteria shall in no way limit or diminish the Trustee's right to terminate a Manager at any time for any reason.

VI. FLORIDA STATUTES AND APPLICABLE CITY SPECIAL ACT OF WEST PALM BEACH

If at any time this document is found to be in conflict with Florida Statutes, or the applicable City of West Palm Beach Special Act, the Statute and Special Act shall prevail.

VII. REVIEW AND AMENDMENTS

It is intended that the Investment Manager and Trustees review this document periodically. 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 any Investment Manager feels that the specific objectives defined herein cannot be met, or the guidelines constrict performance, the Trustees should be so notified in writing. By initial and continuing acceptance of this Investment Policy Statement, the Investment Manager concurs with the provisions of this document.

Handwritten signature in black ink, appearing to be 'JTC ZT'.

APPROVED 05-08-2020

**For the Board of Trustees of the City of West Palm Beach
Police Pension Fund**

Date

Rhumblin Advisers International Equity

VII. REVIEW AND AMENDMENTS

It is intended the Investment Manager and Trustees review this document periodically. 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 any Investment Manager feels that the specific objectives defined herein cannot be met, or the guidelines constrict performance, the Trustees should be so notified in writing. By initial and continuing acceptance of this Investment Policy Statement, the Investment Manager concurs with the provisions of this document.

Rhumblin, will be compared to the MSCI EAFE Index and in the top 40% of the International Equity Universe. The evaluation period for Rhumblin will date from April 1, 2016.

VIII. AUTHORIZED INVESTMENTS

A. For All Equity Investment Managers

Time, savings and money market deposit accounts of a national bank, a state bank or a savings and loan association insured by the Federal Deposit Insurance Corporation provided the amount deposited does not exceed the insured amount.

1. Money Market obligations issued by the U.S. Government, or in obligations guaranteed as to principal and interest by the United States Government or in obligations guaranteed as to principal and interest by the United States Government agency. All money market issues must rank as either Standard & Poor's A1, or Moody's P1.
2. Domestic and International Equities: equities defined as common stocks and issues convertible to equities, provided:
 - a. Each holding shall be listed on a major U.S. exchange (except for the International Equity manager who may also purchase over-the-counter (OTC) securities and securities listed on foreign exchanges).
 - b. Not more than five percent (5%) of the Fund's assets shall be invested in the common stock or capital stock of any one issuing company, nor shall the aggregate investment in any one issuing company exceed five percent (5%) of the outstanding capital stock of the company.
 - c. Not more than ten percent (10%) of any manager's Total Fund portfolio, at market value, shall be invested in foreign securities. The manager must immediately notify the Board and the Consultant when the international exposure reaches ten percent

(10%). An explanation will be needed as to why the manager is changing their discipline. As an international manager Rhumblin shall not have any limitation on the amount invested in foreign securities.

3. The use of unhedged and/or leveraged derivatives will not be allowed in any form.

Handwritten signature in black ink, appearing to be 'JTC ZR'.

APPROVED 05-08-2020

**For the Board of Trustees of the City of West Palm Beach
Police Pension Fund**

Date

Rhumblin Advisers

Date

Anchor Capital Mid Cap Value Equity

VII. REVIEW AND AMENDMENTS

It is intended the Investment Manager and Trustees review this document periodically. 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 any Investment Manager feels that the specific objectives defined herein cannot be met, or the guidelines constrict performance, the Trustees should be so notified in writing. By initial and continuing acceptance of this Investment Policy Statement, the Investment Manager concurs with the provisions of this document.

Anchor Capital, will be compared to the Russell MidCap Value Index and in the top 40% of the MidCap Value Equity Universe. The evaluation period for Anchor Capital will date from October 1, 2007.

A. AUTHORIZED INVESTMENTS

For All Equity Investment Managers

1. Time, savings and money market deposit accounts of a national bank, a state bank or a savings and loan association insured by the Federal Deposit Insurance Corporation provided the amount deposited does not exceed the insured amount.
2. Money Market obligations issued by the U.S. Government, or in obligations guaranteed as to principal and interest by the United States Government or in obligations guaranteed as to principal and interest by the United States Government agency. All money market issues must rank as either Standard & Poor's A1, or Moody's P1.
3. Domestic and International Equities: equities defined as common stocks and issues convertible to equities, provided:
 - a. Each holding shall be listed on a major U.S. exchange (except for the International Equity manager who may also purchase over-the-counter (OTC) securities and securities listed on foreign exchanges).
 - b. Not more than five percent (5%) of the Fund's assets shall be invested in the common stock or capital stock of any one issuing company, nor shall the aggregate investment in any one issuing company exceed five percent (5%) of the outstanding capital stock of the company.
 - c. Not more than ten percent (10%) of any manager's Total Fund portfolio, at market value, shall be invested in foreign securities. The manager must immediately notify the Board and the Consultant when the international exposure reaches ten percent

(10%). An explanation will be needed as to why the manager is changing their discipline.

4. The use of unhedged and/or leveraged derivatives will not be allowed in any form.



APPROVED 05-08-2020

**For the Board of Trustees of the City of West Palm Beach
Police Pension Fund**

Date

Anchor Capital

Date

Rhumblin Advisers Large Cap Core Equity Index Fund

VII. REVIEW AND AMENDMENTS

It is intended the Investment Manager and Trustees review this document periodically. 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 any Investment Manager feels that the specific objectives defined herein cannot be met, or the guidelines constrict performance, the Trustees should be so notified in writing. By initial and continuing acceptance of this Investment Policy Statement, the Investment Manager concurs with the provisions of this document.

Rhumblin Advisers, will be compared to the S&P500 Index and in the top 40% of the Broad Large Cap Core Equity Universe. The evaluation period for Rhumblin Advisers will date from July 1, 2015.

A. AUTHORIZED INVESTMENTS

For All Equity Investment Managers

1. Time, savings and money market deposit accounts of a national bank, a state bank or a savings and loan association insured by the Federal Deposit Insurance Corporation provided the amount deposited does not exceed the insured amount.
2. Money Market obligations issued by the U.S. Government, or in obligations guaranteed as to principal and interest by the United States Government or in obligations guaranteed as to principal and interest by the United States Government agency. All money market issues must rank as either Standard & Poor's A1, or Moody's P1.
3. Domestic and International Equities: equities defined as common stocks and issues convertible to equities, provided:
 - a. Each holding shall be listed on a major U.S. exchange (except for the International Equity manager who may also purchase over-the-counter (OTC) securities and securities listed on foreign exchanges).
 - b. Not more than five percent (5%) of the Fund's assets shall be invested in the common stock or capital stock of any one issuing company, nor shall the aggregate investment in any one issuing company exceed five percent (5%) of the outstanding capital stock of the company.
 - c. Not more than ten percent (10%) of any manager's Total Fund portfolio, at market value, shall be invested in foreign securities. The manager must immediately notify the Board and the Consultant when the international exposure reaches ten percent (10%). An explanation will be needed as to why the manager is changing their discipline.

4. The use of unhedged and/or leveraged derivatives will not be allowed in any form.

A handwritten signature in black ink, appearing to be 'JTC ZT'.

APPROVED 05-08-2020

**For the Board of Trustees of the City of West Palm Beach
Police Pension Fund**

Date

Rhumblin Advisers

Date

Rhumblin Advisers Mid Cap Growth

VII. REVIEW AND AMENDMENTS

It is intended the Investment Manager and Trustees review this document periodically. 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 any Investment Manager feels that the specific objectives defined herein cannot be met, or the guidelines constrict performance, the Trustees should be so notified in writing. By initial and continuing acceptance of this Investment Policy Statement, the Investment Manager concurs with the provisions of this document.

Rhumblin, will be compared to the Russell MidCap Growth Index and in the top 40% of the MidCap Growth Equity Universe. The evaluation period for Rhumblin will date from July 1, 2016.

A. AUTHORIZED INVESTMENTS

For All Equity Investment Managers

1. Time, savings and money market deposit accounts of a national bank, a state bank or a savings and loan association insured by the Federal Deposit Insurance Corporation provided the amount deposited does not exceed the insured amount.
2. Money Market obligations issued by the U.S. Government, or in obligations guaranteed as to principal and interest by the United States Government or in obligations guaranteed as to principal and interest by the United States Government agency. All money market issues must rank as either Standard & Poor's A1, or Moody's P1.
3. Domestic and International Equities: equities defined as common stocks and issues convertible to equities, provided:
 - d. Each holding shall be listed on a major U.S. exchange (except for the International Equity manager who may also purchase over-the-counter (OTC) securities and securities listed on foreign exchanges).
 - e. Not more than five percent (5%) of the Fund's assets shall be invested in the common stock or capital stock of any one issuing company, nor shall the aggregate investment in any one issuing company exceed five percent (5%) of the outstanding capital stock of the company.

f. Not more than ten percent (10%) of any manager's Total Fund portfolio, at market value, shall be invested in foreign securities. The manager must immediately notify the Board and the Consultant when the international exposure reaches ten percent (10%). An explanation will be needed as to why the manager is changing their discipline.

4. The use of unhedged and/or leveraged derivatives will not be allowed in any form.

Handwritten signature in black ink, appearing to be 'JTC ZR'.

APPROVED 05-08-2020

**For the Board of Trustees of the City of West Palm Beach
Police Pension Fund**

Date

Rhumblin Advisers

Date

Wellington Small Cap Value

VII. REVIEW AND AMENDMENTS

It is intended the Investment Manager and Trustees review this document periodically. 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 any Investment Manager feels that the specific objectives defined herein cannot be met, or the guidelines constrict performance, the Trustees should be so notified in writing. By initial and continuing acceptance of this Investment Policy Statement, the Investment Manager concurs with the provisions of this document.

Wellington will be compared to the Russell 2000 Value Index and in the top 40% on the Broad Small Cap Value Universe. The evaluation period will date from April 1, 2016.

A. AUTHORIZED INVESTMENTS

The Board understands Wellington Trust Company, NA (the "Manager") has been delegated as an investment manager for a portion of the assets of the Defined Benefit Plan (the "Fund"). The Manager acknowledges and accepts by signature below that it is a fiduciary under ERISA for those assets under its management for the Fund. The Manager has been directed by the Trustees to utilize the Wellington Trust Multiple Collective Investment Funds Trust, Portfolio ("the Trust") as the investment instrument. It is acknowledged that the Investment Policy Statement of the Defined Benefit Plan differs from the exact investment objectives, policies and restrictions of the Trust.

DISCRETIONARY AUTHORITY

It is acknowledged the Manager is an organization that constructs a diversified portfolio of securities on behalf of investors in the Trust and has full discretion to invest in any particular Investment without prior notice to, or approval by, the Trustees, subject only to the terms and conditions of the offering and organizational documents of the Trust. It is acknowledged the Investment Policy Statement of the Defined Benefit Plan differs from the exact investment objectives, policies and restrictions of the Trust and that this difference is acceptable to the Fund and does not constitute a violation of the Investment Policy Statement.



APPROVED 05-08-2020

**For the Board of Trustees of the City of West Palm Beach
Police Pension Fund**

Date

Wellington Management Company, LLC

Date

Eagle Asset Management Small Cap Growth

VII. REVIEW AND AMENDMENTS

It is intended the Investment Manager and Trustees review this document periodically. 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 any Investment Manager feels that the specific objectives defined herein cannot be met, or the guidelines constrict performance, the Trustees should be so notified in writing. By initial and continuing acceptance of this Investment Policy Statement, the Investment Manager concurs with the provisions of this document.

Eagle Asset Management, will be compared to the Russell 2000 Growth Index and in the top 40% on the Broad Small Cap Growth Universe. The evaluation period for Eagle Asset Management, will date from July 1, 2011.

A. AUTHORIZED INVESTMENTS

For All Equity Investment Managers

1. Time, savings and money market deposit accounts of a national bank, a state bank or a savings and loan association insured by the Federal Deposit Insurance Corporation provided the amount deposited does not exceed the insured amount.
2. Money Market obligations issued by the U.S. Government, or in obligations guaranteed as to principal and interest by the United States Government or in obligations guaranteed as to principal and interest by the United States Government agency. All money market issues must rank as either Standard & Poor's A1, or Moody's P1.
3. Domestic and International Equities: equities defined as common stocks and issues convertible to equities, provided:
 - a. Each holding shall be listed on a major U.S. exchange (except for the International Equity manager who may also purchase over-the-counter (OTC) securities and securities listed on foreign exchanges).
 - b. Not more than five percent (5%) of the Fund's assets shall be invested in the common stock or capital stock of any one issuing company, nor shall the aggregate investment in any one issuing company exceed five percent (5%) of the outstanding capital stock of the company.
 - c. Not more than ten percent (10%) of any manager's Total Fund portfolio, at market value, shall be invested in foreign securities. The manager must immediately notify the Board and the Consultant when the international exposure reaches ten percent

(10%). An explanation will be needed as to why the manager is changing their discipline.

4. The use of unhedged and/or leveraged derivatives will not be allowed in any form.

Handwritten signature in black ink, appearing to be 'JTC ZR'.

APPROVED 05-08-2020

**For the Board of Trustees of the City of West Palm Beach
Police Pension Fund**

Date

Eagle Asset Management

Date

Intercontinental Real Estate

VII. REVIEW AND AMENDMENTS

It is intended the Investment Manager and Trustees review this document periodically. 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 any Investment Manager feels that the specific objectives defined herein cannot be met, or the guidelines constrict performance, the Trustees should be so notified in writing. By initial and continuing acceptance of this Investment Policy Statement, the Investment Manager concurs with the provisions of this document.

Intercontinental, will be compared to the NCREIF Real Estate Index and will date from May 1, 2010.



APPROVED 05-08-2020

**For the Board of Trustees of the City of West Palm Beach
Police Pension Fund**

Date

Intercontinental

Date

Garcia Hamilton & Associates Fixed Income

VII. REVIEW AND AMENDMENTS

It is intended the Investment Manager and Trustees review this document periodically. 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 any Investment Manager feels that the specific objectives defined herein cannot be met, or the guidelines constrict performance, the Trustees should be so notified in writing. By initial and continuing acceptance of this Investment Policy Statement, the Investment Manager concurs with the provisions of this document.

A. AUTHORIZED INVESTMENTS

Fixed Income Portfolio

1. Time, savings and money market deposit accounts of a national bank, a state bank or a savings and loan association insured by the Federal Deposit Insurance Corporation provided the amount deposited does not exceed the insured amount.
2. Obligations issued by the U.S. government or an agency or instrumentality of the U.S. government, including mortgage-related securities, or foreign bonds or other evidence of indebtedness denominated in United States Dollars. The U.S. government securities which may be purchased include direct obligations issued by the United States Treasury, such as Treasury bills, certificates on indebtedness, notes and bonds as well as instruments issued or guaranteed by agencies or instrumentalities of the United States government, including mortgage-related securities. Mortgage-related securities or asset-backed securities not issued by the U.S. government or an agency or instrumentality thereof may also be purchased.
3. Fixed income investments defined as preferred issues and fixed income securities provided:
 - b. All corporate debt issues shall be rated in the highest three (3) categories of quality by any of the following listed services: Moody's, Standard and Poors or Fitch's Manual. Any issue which is downgraded to investment grade (the fourth (4th) category) may be held.

Any issue which is downgraded below investment grade by two (2) of the three (3) above mentioned ratings services must either be sold or specifically approved for retention by the Board.
4. Money market funds, defined as fixed income securities having a maturity of less than one year; provided:

- b. All issues shall meet or exceed Standard & Poor's A1, or Moody's P1 credit rating.
- 5. The use of unhedged and/or leveraged derivatives will not be allowed in any form.



APPROVED 05-08-2020

**For the Board of Trustees of the City of West Palm Beach
Police Pension Fund**

Date

Garcia, Hamilton & Associates

Date

Invesco Emerging Markets Equity

VII. REVIEW AND AMENDMENTS

It is intended the Investment Manager and Trustees review this document periodically. 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 any Investment Manager feels that the specific objectives defined herein cannot be met, or the guidelines constrict performance, the Trustees should be so notified in writing. By initial and continuing acceptance of this Investment Policy Statement, the Investment Manager concurs with the provisions of this document.

Invesco, will be compared to the MSCI Emerging Markets Index and in the top 40% of the Emerging Markets Universe. The evaluation period for Invesco, will date from January 1, 2013.

A. AUTHORIZED INVESTMENTS

For All Equity Investment Managers

1. Time, savings and money market deposit accounts of a national bank, a state bank or a savings and loan association insured by the Federal Deposit Insurance Corporation provided the amount deposited does not exceed the insured amount.
2. Money Market obligations issued by the U.S. Government, or in obligations guaranteed as to principal and interest by the United States Government or in obligations guaranteed as to principal and interest by the United States Government agency. All money market issues must rank as either Standard & Poor's A1, or Moody's P1.
3. Domestic and International Equities: equities defined as common stocks and issues convertible to equities, provided:
 - a. Each holding shall be listed on a major U.S. exchange (except for the International Equity manager who may also purchase over-the-counter (OTC) securities and securities listed on foreign exchanges).
 - b. Not more than five percent (5%) of the Fund's assets shall be invested in the common stock or capital stock of any one issuing company, nor shall the aggregate investment in any one issuing company exceed five percent (5%) of the outstanding capital stock of the company.
 - c. Not more than ten percent (10%) of any manager's Total Fund portfolio, at market value, shall be invested in foreign securities. The manager must immediately notify the Board and the Consultant when the international exposure reaches ten percent

(10%). An explanation will be needed as to why the manager is changing their discipline. As an international manager OFI shall not have any limitation on the amount invested in foreign securities.

4. The use of unhedged and/or leveraged derivatives will not be allowed in any form.

ADDENDUM

For Invesco

Investments made by the Board may include pooled funds. For purposes of this policy, pooled funds may include but are not limited to mutual funds, commingled funds, exchange-traded funds, limited partnerships, and private equity. Pooled funds may be governed by separate documents which may include investments not expressly permitted in this Investment Policy Statement. In the event of investment by the Plan into a pooled fund, the Board will adopt the prospectus or governing policy of the fund as the stated addendum to the Investment Policy Statement. The asset classification of the fund will be based upon its investment objective.



APPROVED 05-08-2020

**For the Board of Trustees of the City of West Palm Beach
Police Pension Fund**

Date

Invesco

Date

J.P. Morgan Real Estate

VII. REVIEW AND AMENDMENTS

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J.P. Morgan, will be compared to the NCREIF Real Estate Index and will date from April 1, 2013.

A handwritten signature in black ink, appearing to be 'JTC ZT'.

APPROVED 05-08-2020

**For the Board of Trustees of the City of West Palm Beach
Police Pension Fund**

Date

J.P. Morgan

Date

Champlain Investment Partners, Mid Cap Equity

VII. REVIEW AND AMENDMENTS

It is intended the Investment Manager and Trustees review this document periodically. 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 any Investment Manager feels that the specific objectives defined herein cannot be met, or the guidelines constrict performance, the Trustees should be so notified in writing. By initial and continuing acceptance of this Investment Policy Statement, the Investment Manager concurs with the provisions of this document.

Champlain Investment Partners, will be compared to the Russell Mid Cap Index and in the top 40% of the Mid Cap Equity Universe. The evaluation period for Champlain Investment Partners will date from July 1, 2019.

B. AUTHORIZED INVESTMENTS

For All Equity Investment Managers

5. Time, savings and money market deposit accounts of a national bank, a state bank or a savings and loan association insured by the Federal Deposit Insurance Corporation provided the amount deposited does not exceed the insured amount.
6. Money Market obligations issued by the U.S. Government, or in obligations guaranteed as to principal and interest by the United States Government or in obligations guaranteed as to principal and interest by the United States Government agency. All money market issues must rank as either Standard & Poor's A1, or Moody's P1.
7. Domestic and International Equities: equities defined as common stocks and issues convertible to equities, provided:
 - d. Each holding shall be listed on a major U.S. exchange (except for the International Equity manager who may also purchase over-the-counter (OTC) securities and securities listed on foreign exchanges).
 - e. Not more than five percent (5%) of the Fund's assets shall be invested in the common stock or capital stock of any one issuing company, nor shall the aggregate investment in any one issuing company exceed five percent (5%) of the outstanding capital stock of the company.

f. Not more than ten percent (10%) of any manager's Total Fund portfolio, at market value, shall be invested in foreign securities. The manager must immediately notify the Board and the Consultant when the international exposure reaches ten percent (10%). An explanation will be needed as to why the manager is changing their discipline.

8. The use of unhedged and/or leveraged derivatives will not be allowed in any form.



APPROVED 05-08-2020

**For the Board of Trustees of the City of West Palm Beach
Police Pension Fund**

Date

Champlain Investment Partners

Date

Rhumblin Advisers Large Cap Growth Equity Index Fund

VII. REVIEW AND AMENDMENTS

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Rhumblin Advisers, will be compared to the R1000G Index and in the top 40% of the Broad Large Cap Growth Equity Universe. The evaluation period for Rhumblin Advisers will date from April 1, 2017.

B. AUTHORIZED INVESTMENTS

For All Equity Investment Managers

5. Time, savings and money market deposit accounts of a national bank, a state bank or a savings and loan association insured by the Federal Deposit Insurance Corporation provided the amount deposited does not exceed the insured amount.
6. Money Market obligations issued by the U.S. Government, or in obligations guaranteed as to principal and interest by the United States Government or in obligations guaranteed as to principal and interest by the United States Government agency. All money market issues must rank as either Standard & Poor's A1, or Moody's P1.
7. Domestic and International Equities: equities defined as common stocks and issues convertible to equities, provided:
 - g. Each holding shall be listed on a major U.S. exchange (except for the International Equity manager who may also purchase over-the-counter (OTC) securities and securities listed on foreign exchanges).
 - h. Not more than five percent (5%) of the Fund's assets shall be invested in the common stock or capital stock of any one issuing company, nor shall the aggregate investment in any one issuing company exceed five percent (5%) of the outstanding capital stock of the company.
 - i. Not more than ten percent (10%) of any manager's Total Fund portfolio, at market value, shall be invested in foreign securities. The manager must immediately notify the Board and the Consultant when the international exposure reaches ten percent (10%). An explanation will be needed as to why the manager is changing their discipline.

8. The use of unhedged and/or leveraged derivatives will not be allowed in any form.

A handwritten signature in black ink, appearing to be 'JTC ZT'.

APPROVED 05-08-2020

**For the Board of Trustees of the City of West Palm Beach
Police Pension Fund**

Date

Rhumblin Advisers

Date

J.P. Morgan Private Equity

VII. REVIEW AND AMENDMENTS

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J.P. Morgan, will be compared to the MSCI World Equity Index and will date from January 1, 2019.



APPROVED 05-08-2020

**For the Board of Trustees of the City of West Palm Beach
Police Pension Fund**

Date

J.P. Morgan

Date

AberdeenStandard Investments Private Equity

VII. REVIEW AND AMENDMENTS

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Aberdeen will be compared to the S&P500 Index plus 5% and will date from January 1, 2019.

A handwritten signature in black ink, appearing to be 'JTC ZT'.

APPROVED 05-08-2020

**For the Board of Trustees of the City of West Palm Beach
Police Pension Fund**

Date

AberdeenStandard Investments

Date

Taurus Private Markets Fund, LP

VII. REVIEW AND AMENDMENTS

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Taurus will be compared to the Russell 3000 plus 3% (R3000+3%) with a one quarter lag and will date from April 1, 2020.

A handwritten signature in black ink, appearing to be 'JTC ZT'.

APPROVED 05-08-2020

**For the Board of Trustees of the City of West Palm Beach
Police Pension Fund**

Date

Taurus Private Markets Fund, LP

Date

EnTrust Global

VII. REVIEW AND AMENDMENTS

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Taurus will be compared to the HRFI Fund of Funds Index and will date from July 1, 2020.

A handwritten signature in black ink, appearing to be 'JTC ZT'.

APPROVED 05-08-2020

**For the Board of Trustees of the City of West Palm Beach
Police Pension Fund**

Date

EnTrust Global

Date