STATE OF MONTANA PUBLIC EMPLOYEES' POOLED TRUST
INVESTMENT POLICY STATEMENT
MONTANA FIXED FUND
Date adopted: April 30, 2019

The Public Employees Retirement Board (the "Board") oversees the Defined Contribution Retirement Plan and the 457(b) Deferred Compensation Plan (each, a "Plan" and collectively, the "Plans") for eligible employees. The Board has established a pooled trust, State of Montana Public Employees' Pooled Trust ("Pooled Trust"), for the purpose of combining the stable value assets of the Plans into one distinct portfolio. The Pooled Trust qualifies as a group trust under Sections 401(a)(including Section 401(a)(24) and 501(a)) of the Internal Revenue Code of 1986, as amended.

The Pooled Trust is comprised of the stable value assets of the Plans, and has been made available for participant investment under the Plans as the Montana Fixed Fund (the "Fund").

This Policy (as defined below) is written, administered, and monitored by the Montana Public Employees' Retirement Board ("Board") with input from the Employee Investment Advisory Committee ("EIAC") and the Board's investment consultant.

The Fund is an actively managed, diversified investment strategy which invests primarily in investment grade fixed income investments including, but not limited to, U.S. government securities, corporate bonds, mortgage-backed securities, asset-backed securities, and derivative instruments, including futures and swaps. The Fund may also invest in cash and other liquid investments, such as a short-term investment fund with the custodian. Other Fund investments may include a variety of stable value investment contracts issued by insurance companies, banks, and other financial institutions, which are intended to help reduce principal volatility of, while providing steady income from, any associated fixed income investments. The Stable Value Investment Contracts provide assurance that future credited income will not be below zero. However, there may be certain circumstances that result in a loss of principal or limit the ability of participants in the Plans from transacting at the amount of their principal investment.

Statement of Purpose

This Investment Policy Statement (the "Policy") is intended to outline the responsibilities of all involved parties and to identify investment guidelines and objectives as well as establish policies and procedures for monitoring the performance standards of the Fund. This Policy is intended to incorporate sufficient flexibility and guidance so as to accommodate current and future economic and market conditions and changes in applicable accounting, regulatory and statutory requirements. The Board will review the Policy periodically, and may utilize the services of investment consultants and other professional advisors in its review, to determine if modifications are necessary or desirable. The Board may amend this Policy in writing at any time, and in its sole discretion. The Board may deviate from this Policy as it deems appropriate in the fulfillment of its responsibilities.

The Policy is intended to serve as a standard for the investment fiduciaries in fulfilling their responsibilities regarding the investment of Plan assets. Unless otherwise stated, this Policy will be applied at the time of purchase or contract implementation, and when adopting investment management policies and capital preservation investment policies.

I. Responsibilities

Board:
Although it is intended that participants will direct their own investments under the Plans, the Board, as investment fiduciary, has the responsibility to select a capital preservation option to be made available for participant investment and then provide on-going oversight of the capital preservation option with the assistance of an Investment Consultant, Stable Value Manager, and Custodian.

Custodian
The Board shall contract on behalf of the Plans with a third party custodian which shall have a level of experience and expertise in providing custodial services to retirement plans and funds similar to those of the Plans and Fund. While the specific duties and responsibilities of the Fund's custodian are contained in the contractual agreement between the custodian and the Board, the custodian, in general, has the following responsibilities:

- Safekeeping of all assets including securities, cash and cash equivalents;

- Handle all income, cash transactions, interest received and other necessary activities;
- Receive instructions from the Stable Value Manager, or other Board authorized parties, to purchase and sell various securities and ensure that transactions are settled according to establish settlement procedures; and
- Provide periodic reporting of transactions of securities

Investment Consultant

While the specific duties and responsibilities of the investment consultant are contained in the contractual agreement between the investment consultant and the Board, the consultant, in general, has the following responsibilities and will assist the Board with the following functions:

- Provide evaluation of the investment results achieved by the Stable Value Manager in light of the investment guidelines and performance standards contained in this Policy;
- Meet with the Board on a predetermined periodic basis; and
- Make recommendations to the Board of appropriate actions to be considered which, in the investment consultant's opinion, will enhance the probability of achieving the overall objectives. Such recommendations may include, but are not limited to:
  - changes in overall investment policy
  - changes in designated Stable Value Manager

Stable Value Manager

The Stable Value Manager has been retained to cause the assets subject to this Policy to be invested in compliance with the Policy, subject to any additional restrictions included in the contractual agreement between the Stable Value Manger and the Board, as described in the investment management agreement, including the investment guidelines thereunder.

The Board has delegated the Stable Value Manager with investment advisory responsibilities and the provision of certain services with respect to the Fund's benefit responsive contracts and associated fixed income assets, as described in this Policy under Section II. hereof Investment Management.

II. Investment Management

Stable Value Investment Contracts

The Stable Value Manager may invest in or cause the Plans to invest in Stable Value Investment Contracts. Stable Value Investment Contracts are issued by insurance companies, banks, and other financial institutions and are intended to help provide steady income and reduce investment volatility in the Fund. Generally, Stable Value Investment Contracts may allow for book value accounting and the ability for qualified withdrawals to occur from such contracts at book value (typically, deposited principal plus accrued interest less redemptions). The ability for investors in the Fund to transact at book value for qualified withdrawals is referred to as being benefit responsive.

Investment Contracts include, but are not limited to, insurance company Separate Account Contracts (SACs), Synthetic Investment Contracts (SICs), Bank Investment Contracts (BICs), and insurance company General Account Contracts (GACs) which are sometimes called GICs. The Fund may also invest in funding agreements and other contracts agreements, or instruments intended to perform similarly to SICs, BICs or GACs.

The terms and conditions of a benefit responsive contract may restrict or require certain actions by the Board or the Stable Value Manager, custodian, Plans, or its agents and may limit the amounts and types of other investments held by the Fund.

<u>Benefit Responsive Contract Services</u>

- Negotiate commercially reasonable terms for agreements or investments that provide benefit responsiveness, as well as investment vehicles that invest in contracts with benefit responsive characteristics;
- Enter into, direct or otherwise cause the Board to enter into any and all documentation for one or more such agreements, investments, or investment vehicles including but not limited to, benefit responsive contracts or other investments that invest in benefit responsive contracts;
- Exercise complete and ongoing discretion concerning the benefit responsive contracts and other investments that invest in benefit responsive contracts, including monitoring creditworthiness, directing execution, termination, reallocation, rebalancing, setting crediting rates, deposits, withdrawals and any other administrative or operational functions required in the execution of the Fund's strategy; and
- Direct the Fund's custodian to facilitate the purchase, sale, transfer, liquidation, withdrawal, or deposit of funds between, out of, or into benefit responsive contracts, other investments that invest in benefit responsive

contracts, fixed income portfolios, liquidity, or individual securities held by the Fund consistent with its liquidity needs, hierarchy structure, and investment strategy.

Duration and Maturity

- The Fund's total weighted average duration of the investments shall not exceed 5 years.
- Duration will be calculated using a reasonable market methodology.
- The maximum maturity of any GAC or BIC shall not exceed seven (7) years from date of settlement of such contract.

Quality Ratings

- The minimum average credit quality of the Fund shall be AA-
- The minimum credit quality of a benefit responsive contract provider should be A- at time of placement by at least one Nationally Recognized Statistical Ratings Organization ("NRSRO") or, if not rated by an NRSRO, will be of comparable quality as determined by the Manager.
- The minimum credit quality of a permitted investment should be BBB- at time of purchase or placement by at least one Nationally Recognized Statistical Ratings Organization ("NRSRO") or, if not rated by an NRSRO, will be of comparable quality as determined by the Manager.
- The Manager shall evaluate the creditworthiness of counterparties to transactions including, but not limited to, derivatives, repurchase agreements, and TBAs.
- Should the Fund or a holding of the Fund no longer meet these minimums, the manager will determine the appropriate action (sell or hold) based on the perceived risk and expected return and any contractual requirements in any benefit responsive investment contracts.

Permitted Investments

In the execution of the strategy of the Fund, the Stable Value Manager will have discretion to invest in a broad array of public and private asset classes, instruments and investment vehicles, including but not limited to the ones specified below. Investments shall be made in accordance with the applicable allocation limitations and minimum credit quality limitations set forth in the Sector Allocations, Additional Limits & Other Restrictions, and Quality Ratings sections of this IPS.

1. Agencies: U.S. Agency Securities and Non-U.S. Agency Securities.

2. Agency CMO: An Agency Residential Mortgage-Backed Security identified in the market as a CMO.

3. Agency Residential Mortgage-Backed Security: An Asset-Backed Security where the security is backed by cash flows from Residential Mortgage Loans that are not pay-option adjustable rate Residential Mortgage Loans

4. Agency RMBS: Agency Residential Mortgage-Backed Pass-through Securities and Agency CMO's.

5. Asset-Backed CP: A senior secured debt obligation of a special purpose vehicle (other than a structured investment vehicle), which obligation has an original maturity of 270 days or less from its date of issuance. See Commercial Paper.

6. Asset-Backed Security (ABS): A security or other instrument evidencing an interest in, or the right to receive payments from, or payable from distributions on, an asset, a pool of assets or specifically divisible cash flows which are legally transferred to a trust or another special purpose bankruptcy-remote business entity. The most common types of ABS are collateralized by mortgages, credit card receivables, or automobile loans and are typically structured as pass throughs or as structures with multiple bond classes, like a CMO. Credit enhancement can take the form of over collateralization, a letter of credit, a third party guaranty, or a senior/subordinated structure.

7. Bank Investment Contracts (BICs): A GAC that is issued by a bank.

8. Cash: Cash is U.S. currency or interests in collective investment trusts that are managed to provide daily liquidity and that permit unrestricted redemption of interests on one business day notice, or interests in money market mutual funds registered with the Securities and Exchange Commission.

9. Cash Equivalents: US dollar denominated securities with a maturity of 1 year or less or an effective duration of 6 months or less.

10. Commercial Mortgage-Backed Security (CMBS): An Asset-Backed Security where the security is backed by cash flows from mortgage loans (or participation interests therein) primarily secured by first liens on mixed-use, commercial, or multifamily properties.

11. Commercial Paper (CP): Asset-Backed CP and Corporate CP, which shall include 4(2) programs (see "Permissible 144(a) Securities"). No investment shall be made in any Commercial Paper issued by a structured investment vehicle. For the avoidance of doubt, the term "structured investment vehicle" shall not include conduit structures.

12. Corporate CP: means an unsecured debt obligation of a foreign or domestic corporation which obligation has an original maturity of 270 days or less from its date of issuance. The above-mentioned security types may be either U.S. or Eurodollar issues. See Commercial Paper.

13. Corporate Securities: Bonds or other evidences of indebtedness which are issued, assumed, or guaranteed by domestic or foreign corporations that (i) are eligible for inclusion in Barclays U.S. Intermediate Corporate Index or (ii) would

be eligible for inclusion in such index but for said bonds' having (1) not been registered under the Securities Act (but otherwise compliant with the exceptions to registration set forth in Section 3(a)(2) of the Securities Act or is a Permissible 144A Security as defined herein), (2) not been publicly issued, (3) a floating rate of interest or coupon that steps up according to a predetermined schedule, (4) a current term to maturity of less than twelve months from the date of purchase, or (5) an issue size of less than $250 million. "Corporate Securities" shall include Yankee and Euro Bonds, but shall not include Commercial Paper.

14. Credit Default Swaps: Credit default swaps are a mechanism to either purchase or sell default insurance. As a purchaser of a credit default swap, the Manager pays a premium to enter into an arrangement that protects a portfolio holding in the event of a default. As a seller of a credit default swap, the Manager collects a premium for underwriting default insurance. Credit Default Swaps may reference a single entity or may be an untranched CDX transaction.

15. Derivative: A security which derives its value from movements in an underlying security, such as Credit Default Swaps, Forwards, Futures (including exchange traded Swaps Futures), Options, and Swaps. See Hedging Transaction and Replication Transaction.

16. Emerging Market Securities: Debt from emerging market countries as defined by the World Bank, which is based on a GNI per capita ratio. Any country with a GNI per capita not eligible to be classified by the World Bank as a high-income economy is an emerging market country. Emerging market debt covers a variety of securities including Brady bonds (typically denominated in U.S. dollars) and debt denominated in local currency.

17. Futures and Forwards: Futures and Forward contracts are agreements to buy or sell a specific amount of a financial instrument for a specific price or yield on a stipulated future or forward date. Unlike forward contracts, futures are traded on exchanges, which are regulated by the CFTC. Manager may use futures and forwards whose underlying instrument is a security or index of an asset type permitted in the guidelines. If non-U.S. dollar exposure is allowed, Manager may also use currency futures and forwards to hedge non-U.S. currency exposure.

18. General Account Contracts (GACs): A stable value investment contract that is issued by an insurance company and is supported by the insurance company general account assets and surplus. The contract will typically specify a rate of return for a specific period of time, offer book value accounting, and will typically pay benefits to plan participants for qualified benefit responsive transactions. The insurance company owns the invested assets and the obligation to the contract-holder is backed by the full financial strength and credit of the contract issuer. These contracts are also known as "traditional guaranteed investment contracts".

19. Money Market Instruments: These assets include U.S. Treasury bills, U.S. government and agency securities, time deposits, bankers acceptances, or certificates of deposits that have a final maturity date not exceeding 397 days from the date of purchase and a credit rating, if applicable, at the time of

purchase of the equivalent of at least A-1 by Standard and Poor's or its equivalent by any other Rating Agency. Money Market Instruments shall include any investments satisfying the criteria for purchase under Rule 2a-7 promulgated under the Investment Company Act of 1940. Further, Repurchase Agreements and Commercial Paper as defined herein are to be categorized as Money Market Instruments.

20. Municipal Bonds ("Munis"): Any note, bond or other evidence of indebtedness of a state, territory or possession of the United States of America, the District of Columbia or any political subdivision of any of the foregoing, as such terms are used and defined in the code or any specific lease under which a state or local governmental unit is lessee or certificate of participation therein.

21. Non-Agency Residential Mortgage-Backed Security: An Asset-Backed Security where the security is (i) backed by cash flows from Residential Mortgage Loans that are not pay-option adjustable rate Residential Mortgage Loans and (ii) neither issued nor guaranteed by GNMA, FNMA, FHLMC, FHLB, VA, or NCUA.

22. Non-Agency RMBS: Prime Non-Agency.

23. Non-U.S. Agency Securities: Debt directly issued by a foreign government-sponsored entity, a wholly-owned agency of a foreign government, or related institution where such debt is fully and explicitly backed by the full faith and credit of a foreign federal government (whether in the form of a direct guaranty or an indirect guaranty that is expressly stated and not just implied).

24. Options: An Option gives the purchaser the right to buy or the seller the obligation to deliver a specified amount of a financial instrument for a specific price or yield on or before a specific date in the future.

25. Permissible 144A Security: A Rule 144A security that, in the case of Commercial Paper, has a minimum issue size of $250M and is 2(a)-7 eligible or, in the case of bonds, including Corporate Securities, ABS, and CMBS, has a minimum issue size of $250M and has registration rights or is eligible for resale under Rule 144A.

26. Prime Non-Agency: A Non-Agency Residential Mortgage-Backed Security where the security is backed primarily by cash flows from Residential Mortgage Loans with respect to which the weighted average credit (FICO) score of the borrowers thereunder was greater than or equal to 720 at the time of origination.

27. Separate Account Contracts (SACs): A stable value investment contract that is issued by an insurance company that is supported first by a segregated separate account that is held by the issuing company, and second by the insurance company general account assets and surplus. The insurance company owns the assets held in the separate account. The crediting rate on a SAC will reset periodically and is typically based on the earnings of the separate account assets. SACs offer book value accounting, and will typically pay benefits to plan participants for qualified benefit responsive transactions.

28. Synthetic Investment Contracts (SICs): A stable value investment structure that offers similar characteristics as a SAC. A SIC includes an asset

ownership component and a contractual component that is intended to be valued at book value. The associated assets backing the contract are owned and held in the name of the plan. To support the contractual component of the SIC, the contract-holder relies first on the associated assets backing the contract, and second, to the extent those assets are insufficient, on the financial backing of the contract issuer. The crediting rate on a SIC will reset periodically and is typically based on the earnings of the associated assets. SICs offer book value accounting, and will typically pay benefits to plan participants for qualified benefit responsive transactions. SICs are issued by banks, insurance companies, and other financial institutions and are also known as "Synthetic GICs", or "wraps".

29. Residential Mortgage Loan: A mortgage loan secured primarily by a first lien on a one- to four-family residential property located in the U.S. or one of its territories.

30. Sovereign and Supranational Debt: Debt issued and backed by Sovereigns or supranational agencies, including but not limited to the World Bank and the European Union.

31. Swaps: Swaps are contracts that allow two counterparties to exchange liabilities and include, but are not limited to, Interest Rate Swaps, Total Return Swaps, and swaptions. An Interest Rate Swap allows two counterparties to exchange their fixed and variable rate liabilities. A Total Return Swap allows for the exchange of the rate of return on an index, such as the Barclays Capital Aggregate Index, for a variable interest rate. A swaption gives the purchaser the right to enter into a specified amount of a swap contract on or before a specified future date. Manager may use these instruments so long as the underlying instrument is a security or index of an asset type permitted in the guidelines.

32. To Be Announced (TBA): A contract for the purchase or sale of Agency RMBS to be delivered at a future agreed-upon date.

33. TIPS: U.S. Treasuries issued in the form of Treasury Inflation-Protected Securities.

34. U.S. Agency Securities: Debt directly issued by a U.S. government-sponsored entity, a wholly-owned agency of the U.S. Government, or federally related institution where such debt is fully and explicitly backed by the full faith and credit of the federal government of the United States of America (whether in the form of a full guaranty or an indirect guaranty of such debt or other similar arrangement that is expressly stated and not just implied).

35. U.S. Treasuries: Bonds or other evidences of indebtedness issued by the U.S. Department of the Treasury.

36. Yankee/Euro Bonds: Yankee bonds are U.S. dollar-denominated securities issued by non-U.S. issuers or foreign subsidiaries of U.S. issuers and are predominantly traded in U.S. markets. Eurobonds are traded in the global marketplace. Issuers of Eurobonds may be domiciled in or outside of the U.S. Global bonds are a hybrid of Yankee and Eurodollar bonds. Like Yankee bonds,

Global bonds are U.S. dollar denominated and issued by non-U.S. issuers or foreign subsidiaries of U.S. issuers, though they are issued and traded in both the U.S. (Yankee) and Euro markets simultaneously.

Prohibited Investments

Unless otherwise granted an exception by the Board, the Stable Value Manager will not invest assets of the Fund directly in:

- Securities whose issuer is in bankruptcy at the time of purchase
- Commodities
- Equities (excluding shares of Pooled Funds, bank STIF accounts and US money market funds and equities distributed as part of a bankruptcy or reorganization)
- Direct ownership of real estate or real property

Stable Value Investment Contract Allocations

Contact Types	Maximum Contract Value Allocation
Synthetic Investment Contracts (SICs)	100%
Separate Account Contracts (SACs)	0%
General Account Contracts (GACs)	0%
Bank Investment Contracts (BICs)	0%

Sector Allocations

Barclays Aggregate Index Class Code I / II	Maximum Allocations	Barclays Aggregate Index Class Code II	Barclays Aggregate Index Class Codes III/IV	Barclays Class Code III/IV Maximum Allocations
Treasuries	100%	Treasuries	Treasuries	100%
Government Related	100%	Agencies	Government Guarantee	40%
			Owned No Guarantee	40%
			Government Sponsored	40%
		Local Authorities	Local Authorities (Munis)	5%
		Supranational	Supranational	15%
		Sovereign	Sovereign	10%
Securitized (Agency MBS)	55%	MBS Passthrough	Agency Fixed Rate (GNMA, FNMA and FHLMC)	55%
			Agency Fixed Rate (FHLB, VA, NCUA)	20%
			Agency Hybrid Arms	10%
		CMO	CMO (Agency only)	30%
Non-Agency	10%		Prime Only	10%

RMBS*				
Securitized (CMBS)	15%	CMBS	CMBS (Senior Only)	15%
Securitized (ABS)	25%	ABS	Credit Card	15%
			Auto Receivables (Prime only)	10%
			Student Loan	10%
			Rate Reduction Bonds	5%
Corporates	45%	Industrial		30%
		Utility		30%
		Financial Institutions		20%

* Non-Agency RMBS does not have a Barclays Class Code.

Additional Limits & Other Restrictions

Security or Investment Type	Security Maximum	Aggregate Limits
Cash and Money Market Instruments	100%	
Repurchase Agreements	25%	
Commercial Paper	25%	
Corporate CP	25%	
Asset-Backed CP	10%	
TIPs	40%	
Permissible 144A Securities	20%	
Agency MBS TBAs	50%	
Agency MBS and Non-Agency RMBS		60%
Non-Agency RMBS, Securitized (CMBS), and Securitized (ABS)		40%
Non-U.S. Agencies, Supranational & Sovereigns, Yankee and Euro Bonds, Eurodollar Corporate CP, and Non-U.S. Denominated Securities (including Emerging Markets)		40%
Yankee and Euro Bonds	20%	
Non-U.S. Denominated Securities**	n/a	
Emerging Markets	5%	
Foreign Currency Exposure (net)**	n/a	
Currency Futures and Forwards**	n/a	
Eurodollar Futures	±30%	±30%
Treasury Futures	±25%	
Exchange-traded Options	±15%	
Interest Rate Swaps	±15%	
Total Return Swaps & Asset Swaps	5%	10%
Purchase Credit Default Swaps	10%	
Sell Credit Default Swaps	10%	

** All assets must be USD denominated.

As a means of obtaining diversified fixed income exposure in an effective manner, upon approval of the Board, in writing, the Stable Value Manager may invest in shares of one or more other pooled funds that the Stable Value Manager believes are similar to or consistent with the credit criteria and investment objectives of the Fund.

Crediting Rate Calculation
The Stable Value Manager will consolidate information to calculate each benefit responsive contract crediting rate as necessary and provide such information to the Board, the Custodian, and benefit responsive contract provider, and communicate reset crediting rates to the Board, the Custodian and any other party as directed by the Board and assist the Custodian in reconciliation of benefit responsive contracts and portfolio valuation. The Stable Value Manager will work with the Board to calculate a blended crediting rate for the next immediate calendar quarter that is representative of the expected return on all of the benefit responsive contracts and unwrapped assets of the fund for the next immediate calendar quarter.

III. Performance Evaluation

The Fund will be evaluated on an annual basis using a rating methodology recommended by the Investment Consultant. The rating methodology will evaluate both qualitative and quantitative factors for a stable value option.

The Fund will be benchmarked against the 3-Year Constant Maturity Treasury (CMT). Additionally, each fixed income investment strategy employed by the Stable Value Manager will be benchmarked against the Bloomberg Barclays Intermediate Government Credit Index for measuring the strategy's return on a market value basis.

The Custodian for the Fund will be evaluated every [three] years using criteria determined by the Board and the Investment Consultant, and may include price, organization size, background, fiduciary responsibility, client relations, custody and transaction services, systems and technology, and experience in managing similar strategies to the Fund.

II. Procedures for Replacement

The Board will conduct a comprehensive, systematic, search for the selection of the Stable Value Manager and/or Custodian and/or pursuant to the State procurement rules.

III. Conclusion

It is understood that the guidance set forth in this Policy are meant to serve as a general framework for prudent investment management and evaluation of investment performance of the Fund. Changing market conditions, economic trends or business needs may necessitate modification of this Investment Policy Statement. Until such modification this document will provide the investment objectives and guidelines for the portfolio, subject to the caveats stated herein.

IV. Acceptance and Adoption

The Board approved and adopted this Statement of Investment Policy and Guidelines as of this 11 Day of APRIL, 2019.

Marty Tuttle, President
Montana Public Employees' Retirement Board