

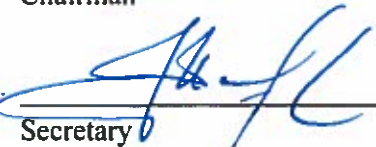
**Statement of
Investment Policies
and Goals**

University of
Saskatchewan
Fixed Income
Investment Pool

October 2015

Approved on this 7 th day of
October, 2015 on behalf of the
Board of Governors:

For: 
Chairman

For: 
Secretary

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Section 1—Overview

1.01 Definitions

For the purposes of this document the following words, phrases and abbreviations are assigned:

- | | |
|---------------------------------------|--|
| (a) Board | Board of Governors of the University of Saskatchewan |
| (b) Custodian | Trust company responsible for safekeeping of the assets, income collection, settlement of investment transactions, and accounting for the investment transactions |
| (c) Fund | Investment assets of the Fixed Income Investment Pool |
| (d) Investment Committee | The Internal Investment Committee of the University of Saskatchewan |
| (e) Investment Consultant | Consulting firm retained by the University of Saskatchewan to provide strategic advice regarding the Fund's investment policy, investment managers and investment performance issues |
| (f) Investment Manager | Professional investment manager hired to manage the assets of the Fund |
| (g) Prudent Person Portfolio Approach | As defined by the Office of the Superintendent of Financial Institutions (OSFI), the Prudent Person Portfolio Approach requires the Board to establish, and the Fund to adhere to, "investment and lending policies, standards and procedures that a reasonable and prudent person would apply in respect of a portfolio of investments and loans to avoid undue risk of loss and obtain a reasonable return". |
| (h) Related Party | A related party is a person who administers the Fund, including any officer, director or employee of the administrator, or any person who is a member of the Investment Committee. It also includes the Investment Manager and Investment Consultant and their employees, a spouse or child of the persons named previously, or a corporation that is directly or indirectly controlled by the persons named previously, among others. Related party does not include government or a government agency. |
| (i) University | The University of Saskatchewan |

1.02 Purpose of the Investment Policy

The purpose of this investment policy is to provide a framework for management of the Fund within levels of risk acceptable to the Board.

A major goal of this policy statement is to establish ongoing communication between the Investment Committee and the Investment Manager. Effective communication will contribute to management of the portfolio in a manner that is consistent with market conditions and with the objectives of the Board. Consultation between the parties will take the form of regular meetings supplemented, from time to time, by informal contact requested by the parties.

This policy is based on the Prudent Person Portfolio Approach to ensure the prudent investment and administration of the assets of the Fund, subject to applicable legislation.

1.03 Nature of the Fund

In order to establish an appropriate policy for the investment and administration of the assets set aside within the Fund, it is important to understand the nature of the underlying accounts and any related ongoing obligations. Accordingly, this section of the policy summarizes various aspects of the fund administration that impact investment return requirements and risk tolerance.

The Fund consists primarily of specific reserves which are pooled for investment purposes until the funds are required for expenditure. The time lines for the related expenditures are short to mid-term in nature (one to five years), although there is a core amount of operating reserves that are long-term in nature. An analysis of past cash flow patterns indicates that a maximum of \$20 million can be considered long-term core funds. The size of the core funds will need to be reviewed by the Investment Committee periodically, at a minimum every two years, and the maximum limit may be revised. Long-term core funds would never require an urgent, unplanned or significant liquidation in a period of less than five years. Given this long investment horizon there is a higher risk tolerance for these funds which allows a portion of the funds to be invested in longer duration bonds.

Term endowments, where the principal and earnings are projected to be expended in five years or less may also be invested in the pool.

In addition, endowed trust funds which cannot be invested in the University's Long-Term Investment Pool due to donor or university restriction may be invested in the Fund.

1.04 Objective of the Fund

There are two overriding objectives for the assets invested in the Fund:

- (a) Enhancement of yield; and
- (b) To provide a steady flow of funds to meet expenditure requirements.

1.05 Investment and Risk Philosophy

(a) Investment Philosophy

The Fund should be prudently managed to assist in avoiding excessive volatility in annual rates of return.

The investment risk level is discussed and assessed by the Investment Committee on an annual basis during this policy's review. Factors considered include return requirements, cash flow needs, risk and return of the capital markets and risk preference of the Board and Investment Committee. Based on the assessment, the long-term investment goal and benchmark portfolio weights are set.

The Fund has a short to mid-term investment horizon as many of the accounts have an investment horizon of five years or less. As such, the Fund has a below-average tolerance for risk. Accordingly, the long-term policy asset mix for the Fund is dedicated to short to mid-term fixed income securities.

(b) Risk Philosophy

In order to achieve the long-term investment goal, the Fund must invest in assets that have uncertain returns such as non-government bonds. However, the Investment Committee attempts to reduce the overall level of risk by maintaining a relatively short duration for the portfolio.

1.06 Administration

The Board of Governors is responsible for assets invested by the University.

Day-to-day administration is provided by Financial Services of the University.

More detail on the roles and responsibilities of the various parties is included in Section 4.01—Delegation of Responsibilities.

Section 2—Asset Mix and Diversification Policy

2.01 Portfolio Return Expectations

The long-term investment goal of the Fund is to achieve a minimum annualized rate of return consistent with short-term bonds.

2.02 Expected Volatility

To achieve this long-term investment goal, the Fund has adopted an asset mix that is dedicated solely to short-term fixed income. Since the Investment Manager is not permitted to use leverage, the volatility of the Fund is expected to be similar to that of the benchmark portfolio.

2.03 Asset Mix

The following table presents the current Fund benchmark and asset component ranges, based on market values.

Combined Fund Benchmark and Asset Component Ranges

| | Minimum % | Benchmark % | Maximum % |
|------------------------------------|--------------|----------------|--------------|
| Fixed Income | | | |
| Canadian "Universe" bonds | | 20 | |
| Canadian short-term bonds and cash | | <u>80</u> | |
| Total Bonds and Cash | 100 | 100 | 100 |

2.04 Management Structure

A management structure with a single Investment Manager has been adopted for management of Fund assets.

The Fund uses active management. Active management provides the opportunity to outperform specific investment benchmarks.

Section 3—Permitted and Prohibited Investments

3.01 General Guidelines

In general and subject to the restrictions noted below, the Fund may invest in any of the following asset classes and investment instruments:

3.02 Permitted Investments

(a) Bonds and Mortgages

- (i) Bonds, debentures, notes, non-convertible preferred stock and other evidence of indebtedness of Canadian or developed market foreign issuers whether denominated and payable in Canadian dollars or a foreign currency
- (ii) Mortgage-backed and asset-backed securities
- (iii) Mortgages secured against Canadian real estate
- (iv) Term deposits and guaranteed investment certificates
- (v) Private placements of bonds subject to Section 3.03(e).

(b) Cash and Short-Term Investments

- (i) Cash on hand and demand deposits
- (ii) Mortgage-backed and asset-backed securities
- (iii) Treasury bills issued by the federal and provincial governments and their agencies
- (iv) Obligations of trust companies and Canadian and foreign banks chartered to operate in Canada, including bankers' acceptances
- (v) Commercial paper and term deposits

(c) Other Investments

- (i) Investments in open or closed-ended pooled funds provided that the assets of such funds are permissible investments under this policy
- (ii) Deposit accounts of the Custodian can be used to invest surplus cash holdings

(d) Derivatives

The use of derivatives (such as options, futures and forward contracts) is permitted to protect against losses from changes in exchange rates, interest rates and market indices; and for non-hedging purposes, as a substitute for direct investment. Sufficient assets or cash must be held to cover commitments due to the derivatives transactions. No derivatives can be used for speculative trading or to create a portfolio with leverage.

Derivatives used in pooled funds are subject to the pooled fund guidelines.

(e) Pooled Funds

Investment in pooled funds is permissible. Should a conflict arise between the provisions of this policy, and the provisions of a pooled fund's investment policy, the Investment Manager will notify the Investments Committee in writing through the Vice President Finance and Resources, detailing the nature of the conflict and the Investment Manager's recommended course of action.

3.03 Minimum Quality Requirements

(a) Quality Standards

Within the investment restrictions for individual Investment Manager portfolios, including pooled funds, all portfolios should hold a prudently diversified exposure to the intended market.

- (i) The minimum quality standard for individual bonds, debentures, mortgage-backed securities and asset-backed securities is 'BBB' or equivalent as rated by a recognized bond rating agency at the time of purchase (includes all sub-rating levels within the overall 'BBB' rating).
- (ii) The minimum quality standard for individual short-term investments is 'R-1' or equivalent as rated by a recognized bond rating agency, at the time of purchase
- (iii) Province of Saskatchewan securities are permissible investments.
- (iv) All investments shall be reasonably liquid (i.e., in normal circumstances they should be capable of liquidation within 1 month)

(b) Split Ratings

In cases where the Recognized Bond Rating Agencies do not agree on the credit rating, the security will be classified according to the methodology used by FTSE TMX Global Debt Capital Markets, which states:

- (i) If two agencies rate a security, use the lower of the two ratings;
- (ii) If three agencies rate a security, use the most common; and
- (iii) If all three agencies disagree, use the middle rating.

(c) Downgrades in Credit Quality

The Investment Manager will take the following steps in the event of a downgrade in the credit rating of a portfolio asset by a recognized bond rating agency to below the purchase standards set out in Section 3.03 (a) Quality Standards:

- (i) The Investment Committee will be notified of the downgrade by telephone at the earliest possible opportunity;
- (ii) Within ten business days of the downgrade, the Investment Manager will advise the Investment Committee in writing of the course of action taken or to be taken by the Investment Manager, and its rationale; and

- (iii) The Investment Manager will provide regular reporting on the status of the asset until such time as it matures, is sold or is upgraded to a level consistent with the purchase quality standards as expressed in the above guidelines.

(d) Rating Agencies

For the purposes of this policy, the following rating agencies shall be considered to be 'recognized bond rating agencies':

- (i) DBRS (for Canadian issuers only);
- (ii) Standard and Poor's;
- (iii) Moody's Investors Services; and
- (iv) Fitch Ratings (for foreign issuers only).

(e) Private Placement Bonds

Private placement bonds are permitted subject to all of the following conditions:

- (i) The issues acquired must be minimum 'BBB' or equivalent rated;
- (ii) The Investment Manager's portfolio may not hold more than 5% of the market value of any one private placement; and
- (iii) The Investment Manager must be satisfied that there is sufficient liquidity to ensure sale at a reasonable price.

3.04 Maximum Quantity Restrictions

The Investment Manager shall adhere to the following restrictions:

(a) Bonds and Short-Term Investments

- (i) Except for federal and provincial bonds (including government guaranteed bonds), no more than 10% of an Investment Manager's bond portfolio may be invested in the bonds of a single issuer and its related companies
- (ii) Except for federal and provincial bonds, no one bond holding shall represent more than 10% of the market value of the total outstanding for that bond issue
- (iii) 'BBB' or equivalent rated bonds may not be purchased if the purchase would raise the 'BBB' holdings to more than 15% of the market value of the bond portfolio
- (iv) No more than 15% of the market value of an Investment Manager's bond portfolio shall be invested in bonds of foreign issuers
- (v) Foreign currency exposure is limited to 10% of the market value of the bond portfolio

(b) Pooled Fund Investments

An investment by the Fund in a single pooled fund should not exceed 10% of the market value of that fund unless provision has been made to transfer assets out of the fund "in kind"

3.05 Prior Permission Required

The following investments require prior permission from the Investment Committee:

- (a) Derivatives other than those otherwise permitted in Sections 3.02(d) above; and
- (b) Any other investment not explicitly authorized in this policy.

3.06 Prohibited Investments

The Investment Managers shall not:

- (a) Invest in companies for the purpose of managing them;
- (b) Purchase securities on margin or engage in short sales, except as allowed in 3.02(d); or,
- (c) Make any investment not specifically permitted by this policy.

3.07 Securities Lending

The securities of the Fund may not be loaned, except within pooled funds where the pooled fund investment policy permits securities lending.

3.08 Borrowing

The Fund shall not borrow money, except to cover short-term contingency and the borrowing is for a period that does not exceed ninety days, subject to applicable legislation.

Section 4—Monitoring and Control

4.01 Delegation of Responsibilities

The Board has established a Finance and Investment Committee, and an Internal Investment Committee to assist in fulfilling its responsibility. The Investment Committee will report to the Board through the Investment Committee Chair.

In general, the Board has a fiduciary responsibility to manage the investments prudently. The Board has delegated authority to the Investment Committee to:

- Establish and recommend an investment policy to the Board;
- Recommend an investment management structure (number of Investment Managers, investment mandate);
- Recommend appointment of the Investment Manager, the Investment Consultant and the Custodian;
- Monitor investment performance;
- Monitor compliance with this policy;
- Liaise with the Investment Consultant, Investment Manager and Custodian;
- Authorize the Vice-President (Finance and Resources) to hire any agent, broker, Investment Manager, Custodian and other advisors that the Committee deems appropriate to fulfil their fiduciary responsibilities; and
- Recommend changes to this policy for review and, to the extent acceptable, acceptance by the Board.

Responsibility for investment management of the assets of the Fund has been delegated to the Investment Manager. Responsibility for safekeeping of the assets has been delegated to the Custodian.

In completing the above duties, a number of responsibilities have been delegated:

- (a) The Investment Managers will:
 - (i) Invest the assets of the Fund in accordance with this policy;
 - (ii) Meet with the Investment Committee as required and provide quarterly written reports regarding their past performance, their future strategies and other issues as requested;
 - (iii) Notify the Investment Committee, in writing, of any legal or regulatory proceedings or charges of which the Investment Manager may be aware, against its firm or investment personnel, or against any sub-advisor or that firm's personnel; and
 - (iv) File quarterly compliance reports (see Section 4.03).
- (b) The Custodian will:
 - (i) Maintain safe custody over the assets of the Fund;
 - (ii) Execute the instructions of the Board, as delegated to any Manager appointed to manage the assets of the Fund; and
 - (iii) Record income and provide monthly financial statements as required.
- (c) The Investment Consultant will:
 - (i) Assist in the development and implementation of this policy and provide related research;
 - (ii) Monitor the investment performance of the Fund and the Investment Managers on a quarterly basis;
 - (iii) Support the Investment Committee on matters relating to investment management and administration of the Fund; and
 - (iv) Meet with the Investment Committee as required.
- (d) Financial Services of the University will:
 - (i) Maintain a unitized record-keeping system to account for proportionate ownership of assets in the Fund;
 - (ii) Account for additions, withdrawals and balances in the various trust accounts;
 - (iii) Manage cash flow to ensure adequate liquidity to meet the conditions of the trusts;
 - (iv) Maintain and rebalance the Fund's asset mix as outlined in Section 4.03;
 - (v) Liaise with donors;
 - (vi) Liaise with the Investment Consultant, Investment Manager and Custodian, and

(vii) Prepare financial statements that are subject to independent audit.

4.02 Performance Measurement

The performance of the Fund shall be measured quarterly and return calculations shall be as follows:

- Time weighted rates of return; and
- Total returns, including realized and unrealized gains and losses and income from all sources.

Measurement against performance objectives for the Investment Managers will normally be assessed over rolling four-year periods.

(a) Fund Benchmark

The primary objective for the Fund is to earn a rate of return, net of fees, that exceeds the rate of return earned on a benchmark portfolio. The benchmark consists of the following market index total returns weighted as indicated:

Fund Benchmark*

| | % |
|---------------------------------------|-----------|
| FTSE TMX Canada Universe Bond Index | 20 |
| FTSE TMX Canada Short Term Bond Index | <u>80</u> |
| | 100 |

* Effective March 1, 2005

Active Investment Manager Performance Objectives

The benchmark performance objective for the Investment Manager is tailored to the specific mandate established for the Investment Manager. Accordingly, the asset class performance objectives may change over time. Currently, the asset class objectives are to exceed the following indices, net of fees, with an appropriate level of volatility:

Universe Bonds = FTSE TMX Canada Universe Bond Index total return

Short Term Bonds = FTSE TMX Canada Short Term Bond Index total return

The market indices referred to in this section may be changed by the Investment Committee to match the specific investment mandates for the Investment Manager selected to manage the portfolio, recognizing that at all times the Fund must be managed in accordance with the asset mix guidelines with regard to permitted and prohibited investments set out in Sections 2 and 3 above.

4.03 Reporting by the Investment Managers

On a calendar quarterly basis, the Investment Managers will provide a performance report and a strategy review for the portfolio under management.

Also, the Investment Manager is required to complete and sign a compliance report each quarter. The compliance report should indicate whether or not the Investment Manager's portfolio was in compliance with this policy during the quarter. Copies of the compliance reports must be sent to the Investment Consultant and to the Manager, Pension and Investments for distribution to the Investment Committee. A suggested report format for the compliance report is included under the appendix.

In the event that the Investment Manager is not in compliance with this policy, the Investment Manager is required to advise the Manager, Pension and Investments immediately, detailing the nature of the non-compliance and recommending an appropriate course of action to remedy the situation. If it is in the best interest of the Fund, the Investment Committee may permit the Investment Manager, on a temporary basis, to be outside of the guidelines.

If the Investment Manager believes the Asset Mix Guidelines are inappropriate for anticipated economic conditions, the Investment Manager is responsible for advising the Manager, Pension and Investments that a change in guidelines is desirable and the reasons therefore.

The Fund may invest in pooled funds that have separate investment policies. Should a conflict arise between the provisions of this policy, and the provisions of the pooled fund investment policies, the respective Investment Manager is required to notify the Manager, Pension and Investments immediately in writing, detailing the nature of the conflict and the Investment Manager's recommended course of action.

On an annual basis, the Investment Manager will provide a copy of their auditors report on compliance with their internal controls.

4.04 Standard of Professional Conduct

The Investment Manager is expected, as a minimum, to comply, at all times and in all respects, with the Code of Ethics and Standards of Professional Conduct as promulgated by the CFA Institute.

The Investment Manager will manage the assets with the care, diligence and skill that a prudent person skilled as a professional investment manager would use in dealing with endowment assets. The Investment Manager will also use all relevant knowledge and skill that it possesses or ought to possess as a prudent investment manager.

4.05 Suppression of Terrorism

The Investment Managers must comply at all times and in all respects with the Federal Suppression of Terrorism Regulations.

Section 5—Administration

5.01 Conflicts of Interest

(a) Responsibilities

This standard applies to the members of the Investment Committee and employees of the University who have responsibilities in administration of the Fund, as well as to all agents employed by them, in the execution of their responsibilities related to the Fund (the "Affected Persons").

An "agent" is defined to mean a company, organization, association or individual, as well as its employees, who are retained by the Investment Committee to provide specific services with respect to the investment, administration and management of the Fund.

In carrying out their fiduciary responsibilities, these parties must act at all times in the best interest of the Fund.

(b) Disclosure

In the execution of their duties, the Affected Persons shall disclose any material conflict of interest relating to them, or any material ownership of securities, which would appear to a reasonable person to impair their ability to render unbiased advice, or to make unbiased decisions, affecting the administration of the Fund.

No Affected Person shall make any personal financial gain (direct or indirect) because of his or her fiduciary position. However, normal and reasonable fees and expenses incurred in the discharge of their responsibilities are permitted if documented and approved by the Investment Committee.

No Affected Person shall accept a gift or gratuity or other personal favor, other than one of nominal value, from a person with whom the individual deals in the course of performance of his or her duties and responsibilities for the Investment Committee.

It is incumbent on any Affected Person who believes that he/she may have a conflict of interest, or who is aware of any conflict of interest, to disclose full details of the situation to the attention of the Vice-President, Finance and Resources and the Investment Committee Chair immediately. The Investment Committee Chair, in turn, will decide what action is appropriate under the circumstances but, at a minimum, will raise the matter and have it recorded in the minutes of the next regular meeting of the Investment Committee.

No Affected Person who has or is required to make a disclosure which is determined to be in conflict as contemplated in this policy shall participate in any discussion, decision or vote relating to any proposed investment or transaction in respect of which he or she has made or is required to make disclosure.

5.02 Related Party Transactions

Without prior approval of the Investment Committee Chair, the Fund may not enter into a transaction with a related party unless:

- (a) The transaction is required for the operation or administration of the Fund (not including loans or investments) and the terms and conditions of the transaction are not less favourable to the Fund than market terms and conditions; or
- (b) The investment is in an investment fund in which other investors may invest and that complies with the regulations governing the investments in a plan or in member choice accounts; or
- (c) The investment is in a unallocated general fund of an authorized Canadian life insurance company; or
- (d) The investment is in securities issued by or fully guaranteed by the Government of Canada, the government of a province, or an agency of either of these governments; or
- (e) The investment is in a fund composed of mortgage-backed securities that are fully backed by the Government of Canada, the government of a province, or an agency of either of these governments; or
- (f) The investment is in a fund that replicates the composition of a broad class of securities traded at a marketplace; or
- (g) The investment involves the purchase of a contract or agreement under which the return is based on the performance of a widely recognized index of a broad class of securities traded at a marketplace.

Under the conflict of interest guidelines, any person who becomes aware of a conflict of interest shall notify the Vice-President, Finance and Resources and the Investment Committee Chair if a conflict arises. Such conflict includes related party transactions.

5.03 Valuation of Securities Not Regularly Traded

The following principles will apply for the valuation of investments that are not traded regularly:

- (a) Bonds; average of bid-and-ask prices from two major investment dealers, at least once every calendar quarter;
- (b) Mortgages; unless in arrears, at the outstanding principal;
- (c) Securities that are not publicly traded are valued at cost unless there is an external transaction or other evidence that indicates market value is different from cost.

5.04 Investment Policy Review

This policy may be reviewed and revised at any time, but it must be formally reviewed by the Investment Committee at least once in every calendar year and to the extent changes are necessary, the Investment Committee shall make recommendations to the Board as to the changes in this policy.

Section 6—Investment Managers

6.01 Selecting Investment Managers

In the event that a new Investment Manager must be selected or additional Investment Managers added to the existing Investment Manager, the Investment Committee will undertake an Investment Manager search. The criteria used for selecting an Investment Manager will be consistent with the investment and risk philosophy set out in Section 1.05 (Investment and Risk Philosophy).

As responsible corporate behaviour with respect to environmental, social and governance (ESG) factors is recognized to have a positive influence on long-term shareholder value, the Committee may consider an Investment Manager's approach to ESG or sustainability factors when selecting Investment Managers.

6.02 Monitoring of Investment Managers

To enable the Investment Committee to fulfil its responsibility of monitoring and reviewing the investment managers, the Investment Consultant will assist the Investment Committee, on an ongoing basis, in considering:

- (a) Investment Manager's staff turnover, consistency of style and record of service;
- (b) Investment Manager's current economic outlook and investment strategies;
- (c) Investment Manager's compliance with this policy, where the Investment Manager is required to complete and sign a compliance report; and
- (d) Investment performance of the assets of the Fund in relation to the rate of return expectations outlined in this policy.

6.03 Reasons for Terminating an Investment Manager

Reasons for considering the termination of the services of an Investment Manager include, but are not limited to, the following factors:

- (a) Performance results, which over a reasonable period of time, are below the stated performance benchmarks;
- (b) Changes in the overall structure of the Fund such that the Investment Manager's services are no longer required;
- (c) Change in personnel, firm structure and investment philosophy, style or approach which might adversely affect the potential return and/or risk level of the portfolio;

- (d) Legal or regulatory proceedings against the Investment Manager or its investment personnel, or any sub-advisor firm or that firm's investment personnel; and/or
- (e) Failure to adhere to this policy.

Section 7—Investment Consultant

7.01 Selection & Termination Policy

(a) Selection

The Investment Committee shall consider the following criteria when selecting an Investment Consultant to monitor the investment performance for the Fund:

- (i) The Investment Consultant has established a reputation for expertise in the issues and regulations governing institutional investment portfolios in Canada.
- (ii) The Investment Consultant has established a reputation for proactive advice to governance committees.
- (iii) The Investment Consultant has established a reputation for quality client servicing. The criteria for judging this quality include clear, accurate and complete reporting, both orally and in writing.
- (iv) The Investment Consultant's fees shall be competitive.

(b) Termination

Reasons for considering the termination of the services of the Investment Consultant include, but are not limited to, not maintaining the selection criteria cited above.

Appendix A—Compliance Report

University of Saskatchewan Trust Funds
Fixed Income Pool
Compliance Report For The Period From _____ To _____
(date) (date)

| | | Guidelines | Policy Complied With Yes/No* |
|------------------------------------|---------------------------|--|------------------------------|
| | | % | |
| Asset Mix (at Market Value) | | | |
| Canadian Bonds and Cnsh | | 100 | |
| Constraints | | | |
| Pooled Funds | - Concentration | Max 10% of market value of any Pooled Fund | |
| Bonds | - Quality | Min 'BBB', Max 15% of market value of bond portfolio in 'BBB' | |
| | - Foreign Issuer | Max 15% of the market value of the bond portfolio | |
| | - Foreign Currency | Max 10% exposure at market value to foreign currencies within the bond portfolio | |
| Short Term Investments | - Minimum Quality | 'R-1' rating plus Province of Saskatchewan | |
| Private placements | - Bonds | Min 'BBB' rating, max 5% of any issue, adequate liquidity | |
| Other Investments | - Prior Approval Required | | |
| Conflicts of Interest | - Disclosure | Conflicts of interest disclosed to the Investment Committee Chair | |
| Suppression of Terrorism | - Compliance | Compliance with Federal Suppression of Terrorism Regulations | |

* Provide actual weight or range where appropriate.

If portfolio not in compliance with policy, comment on specifics.

I believe this to be a factual representation of compliance with the Statement of Investment Policies and Goals throughout the reporting period.

Signature and Title

Company Name