

STATEMENT OF INVESTMENT POLICY
SOUTHERN ILLINOIS UNIVERSITY
BOARD OF TRUSTEES

I. STATEMENT OF OBJECTIVES

It is the policy of Southern Illinois University to invest funds in a manner which will provide investment returns and security consistent with good business practices, while meeting the daily cash flow demands of the University and conforming to all statutes governing the investment of funds. Funds of Southern Illinois University will be invested in accordance with the provisions of the Illinois Compiled Statutes, Chapter 30, Sections 235/0.01 - 235/8, "The Public Funds Investment Act," the Policies of the Board of Trustees of Southern Illinois University, and covenants provided from the University's bond and Certificate of Participation issuance activities.

As provided in Illinois Compiled Statutes, Chapter 30, Section 225 "The Public Funds Deposit Act," public funds of the University will be deposited in savings and loan associations, savings banks, or State or national banks in Illinois.

A. Overall Risk Profile

The three basic objectives of Southern Illinois University's Investment Program are:

1. Safety of invested funds;
2. Maintenance of sufficient liquidity to meet cash flow needs;
3. Attainment of the maximum i

a. Credit risk will be mitigated by:

Portfolio	Approximate Average Maturity Range
Cash & Cash Equivalents	Less than one year; typically less than 30 days
Short Term	Up to 3 years;
Intermediate Term	Up to 10 years

C. Definition of Funds

Funds for the purpose of this policy are University funds which are available for investment at any one time. Funds include those in the University's general operation and debt financing activities.

D. Prudence

Investments shall be made with judgment and care - under circumstances then prevailing - which persons of prudence, discretion and intelligence exercise in management of their own affairs, not for speculation but for investment, considering the probable safety of their own capital as the probable income to be derived.

The standard of prudence to be used by investment officials shall be the "prudent person" standard and shall be applied in the context of managing an overall portfolio.

II. INVESTMENTS

This section of the Investment Policy identifies the types of instruments in which the University may invest its funds.

A. Eligible Securities

1. Southern Illinois University will make investments under the Public Funds Investment Act (Illinois Compiled Statutes Chapter 30, sections 235/0.01 - 235/8). This affords the University a number of investment opportunities including:

Securities of the United States of America, its agencies, and its instrumentalities;

Interest bearing savings accounts, certificates of deposit, interest bearing time deposits, other direct obligations of any bank defined in the Illinois Banking Act;

Certain obligations of U.S. Corporations rated in the three highest rating classifications by at least two standard rating services provided: the issuing entity has at least \$500 million in assets; such purchases do not exceed 10% of the corporation's outstanding obligations; no more than one-third of the University's funds may be invested in short-term obligations that mature within 270 days or less from the investment date; and, no more than one-

third of the University's funds may be invested in long-term obligations of corporations that mature in more than 270 days but less than three years from the date of settlement;
 Money market mutual funds provided they are comprised of only U.S. Treasuries, Agencies, and instrumentalities;
 Public Treasurer's Investment Pool-State Treasurer's Office;
 Repurchase agreements-Government securities;
 Other specifically defined repurchase agreements.

2. Southern Illinois University may pool their funds with other Illinois Public Agencies for investment purposes under the Intergovernmental Cooperation Act, 5 ILCS 220/1 et seq. This affords the University the opportunity to invest, in accordance with the Public Funds Investment Act (Illinois Compiled Statutes Chapter 30, sections 235/0.01 – 235/8), through:

The Illinois Trust local government investment pools.

B. Diversification

Southern Illinois University will diversify its investments by security type, issue and maturity in order to reduce overall portfolio risks while striving to meet or exceed the benchmark average rate of return. Obligations of the United States of America, its agencies, and its instrumentalities are eligible without limit. No more than one-third of Southern Illinois University's funds may be invested in obligations of corporations.

C. Collateralization Requirements

In accordance with the State Finance Act (30 ILCS 105/6a-1), deposits that exceed the amount of federal deposit insurance coverage shall be collateralized using eligible securities as listed in the Deposit of State Moneys Act (15 ILCS 520/11). The collateral for various investments shall be held by third parties or in a separate trust department of a participating bank. The collateralization level must be in an amount equal to at least market value of the amount of funds deposited exceeding the insurance limitation provided by the Federal Deposit Insurance Corporation or the National Credit Union Administration or

F. Pooling

The University will pool all operating cash for investment purposes to provide for efficiencies and economies in their management. Proceeds related to revenue bond and certificate of participation financing activities will be pooled to the extent allowed under the covenants.

III. SELECTION OF INVESTMENT ADVISORS, INVESTMENT MANAGERS, AND FINANCIAL INSTITUTIONS

A. Investment Advisors and Investment Managers

Investment advisors and investment managers who manage University funds must be registered with the Securities and Exchange Commission and carry adequate levels of insurance. The University will annually send a copy of the Investment Policy to investment advisors and investment managers who manage University funds. The University will follow the State's Procurement Policy when issuing public Requests For Proposal in selecting its advisors and managers.

B. Qualification of Brokers, Dealers, and Financial Institutions

The University will only transact business with banks, savings and loan associations, and broker dealers who have been approved by the University.

If the University hires an investment advisor to provide investment management services, and the investment advisor maintains a list of approved Broker/Dealers that is adhered to for investment transactions, the University may adopt that Investment Advisor's list as it may be amended periodically.

IV. INTERNAL CONTROL PROCEDURES

A. Purchase of Securities

The Treasurer will delegate authorization to purchase investment securities to employees, as needed. A list of these authorized employees will be provided to each investment broker/dealer. Confirmation of the purchase of authorized securities will be provided to the Treasurer. All security transactions will be conducted "delivery versus payment."

On occasion, there will be a need for the Treasurer to delegate authorization to a third party to purchase securities on behalf of the University. In these instances, a one-time delegation will be executed that clearly states the type of security, the amount to be purchased, the maturity date and the purchase date.

B. Safekeeping of Assets

All securities (except collateral) owned by the University will be held by its safekeeping agents. The University will contract with a bank or banks for the safekeeping of securities which are owned by the University as a part of its investment portfolio or which have been transferred to the University under the terms of any repurchase agreements. Safekeeping reports shall be provided.

C. Sale of Securities

The Treasurer will delegate authorization to initiate the sale of investment securities to employees, as needed. A list of the authorized employees will be provided to each broker/dealer. The proceeds of all sales transactions will be deposited into a University account.

D. Wire/ACH Transactions

Where possible, the University will use repetitive wire transfers and preformatted ACH transfers to restrict the transfer of funds to preauthorized accounts only. When transferring funds to an account using a non-repetitive wire or a non-preformatted ACH transfer, the bank is required to obtain a second pre-established employee for confirmation that the transfer is authorized.

V. STRUCTURE AND RESPONSIBILITY

This section of the Policy defines the overall structure of the investment management program.

A. Responsibilities of the Finance Committee of the Board of Trustees

The Finance Committee of the Board of Trustees will, upon recommendation of the Treasurer:

1. review and recommend to full Board a written investment policy, consistent with the requirements of the Public Funds Investment Act.
2. review quarterly investment reports.
3. approve the selection and assess the performance of investment managers.

B. Responsibilities of the Treasurer

The Treasurer is appointed by the Board of Trustees and is chief custodian of all funds held in the name of the Board of Trustees. The Treasurer is responsible for

recommending, as necessary, financial policies and procedures to ensure compliance with State and Federal laws, Board Policies and University Guidelines. Investment oversight and banking relationships are also responsibilities of the office. The Treasurer is responsible for providing the President and Board of Trustees, via the Finance Committee, a quarterly report of cash and investment activities.

C. Investment Managers

The investment managers are accorded full discretion, within the limits set forth in this Statement of Investment Policy and investment guidelines, to (1) select individual securities, (2) adjust the maturity mix, where applicable, and (3) diversify their portfolios so as to limit the impact of large losses in individual investments on the total portfolio.

The investment managers will provide the Treasurer with a monthly report of investment activity and investment performance.

D. Ethics and Conflicts of Interest

Officers, employees and agents, including, not limited to, investment managers, involved in the investment process shall refrain from personal business activity that conflicts with the proper execution of the investment program, or impairs their investment duties.

Intermediate Term Barclays Capital Intermediate