

INVESTMENT POLICY OF THE CITY OF MARSHALLTOWN

PURPOSE

It is the purpose of this investment policy to not only make a clear and unequivocal statement concerning policies and procedures relative to Marshalltown investments but to be in compliance with the Code of Iowa Chapter 12B.10B for the investment of public funds.

SECTION 1 - SCOPE OF INVESTMENT POLICY

The Investment Policy of Marshalltown shall apply to all checking, money market and savings accounts, operating funds, bond proceeds, and other funds accounted for in the financial statements of Marshalltown. Each investment made pursuant to this Investment Policy must be authorized by applicable law and this written Investment Policy.

The investment of bond funds or sinking funds shall comply not only with this investment policy but also be consistent with any applicable bond resolution and bond covenants.

Upon passage and future amendment, if any, copies of this Investment Policy shall be emailed to all of the following:

1. The governing body (Council and Mayor), City Treasurer, City Accounting Manager, and City Administrator of Marshalltown to which the Investment Policy applies.
2. All depository institutions or fiduciaries for public funds of Marshalltown.
3. The auditor engaged to audit any fund of Marshalltown.
4. Investment Advisory Committee for the City of Marshalltown.

SECTION 2 - DELEGATION OF AUTHORITY

The responsibility for conducting investment transactions resides with the City Treasurer and City Administrator of Marshalltown. Only the City Treasurer, City Administrator, and others authorized by ordinance or resolution may invest public funds. A copy of any empowering ordinance or resolution shall be attached to this Investment Policy.

The records of investment transactions made by or on behalf of Marshalltown are public records and are the property of Marshalltown, whether in the custody of Marshalltown or the custody of a fiduciary or other third party.

The City Treasurer shall establish a written system of internal controls and investment practices. The controls shall be designed to prevent losses of public funds, to document those officers and employees of Marshalltown responsible for elements of the investment process, and to address

the capability of investment management. The controls shall provide for receipt and review of the audited financial statement and related report on the internal control structure of all outside persons performing any of the following for this public body:

1. Investing public funds.
2. Advising on the investment of public funds.
3. Directing the deposit or investment of public funds.
4. Acting in a fiduciary capacity for this public body.

A bank providing only depository services shall not be required to provide an audited financial statement and related report on the internal control structure.

The City Treasurer and City Administrator of Marshalltown and all employees authorized to place investments shall be bonded in the amount of \$1,000,000.00.

SECTION 3 - OBJECTIVES OF INVESTMENT POLICY

The primary objectives, in order of priority, of all investment activities involving the financial assets of Marshalltown shall be the following:

1. **Safety** - Safety and preservation of principal in the overall portfolio is the foremost investment objective.
2. **Liquidity** - Maintaining the necessary liquidity to match expected liabilities is the second investment objective.
3. **Return** - Obtaining a reasonable return is the third investment objective.

SECTION 4 - PRUDENCE

The City Treasurer and City Administrator of Marshalltown, when investing or depositing public funds, shall exercise the care, skill, prudence, and diligence under the circumstances then prevailing that a person acting in a like capacity and familiar with such matters would use to attain the Section 3 investment objectives. This standard requires that when making investment decisions, the City Treasurer and City Administrator shall consider the role that the investment or deposit plays within the portfolio of assets of Marshalltown and the investment objectives stated in Section 3.

When investing operating and reserve funds, the City Treasurer and City Administrator shall request competitive bids for the specified period(s) and amount(s). Operating and reserve funds do not include checking, savings, and money market funds.

SECTION 5 - INSTRUMENTS ELIGIBLE FOR INVESTMENT

Assets of Marshalltown may be invested in the following:

1. Interest-bearing savings accounts, interest-bearing money market accounts, and interest-bearing checking accounts at any bank properly declared as a depository by

the governing body of Marshalltown and not exceeding the amount allowed by Council resolution. Each bank must be on the most recent Approved Bank List as distributed by the Treasurer of the State of Iowa, or as amended as necessary by notice inserted in the monthly mailing by the Rate Setting Committee.

2. Obligations of the United States Government, its agencies, and instrumentalities, either an implicit or explicit backing of the full faith of the United States Government.
3. Certificates of deposit and other evidence of deposit at federally insured depository institutions approved pursuant to Iowa Code Chapter 12C.6(3) shall draw rates not less than the minimum rate set under Iowa Code section 12.C.6 for state funds.
4. Iowa Public Agency Investment Trust (IPAIT) to include any products available from IPAIT.
5. Repurchase agreements, whose underlying collateral consists of obligations of the United States Government, its agencies, and instrumentalities and Marshalltown take delivery of the collateral either directly or through an authorized custodian.

All instruments eligible for investment are further qualified by all other provisions of this Investment Policy, including Section 7- Investment Maturity Limitations and Section 8 - Diversification Requirements.

Upon the departure of the City Treasurer or City Administrator from office, only the following instruments authorized as eligible for investment in Section 5 shall be authorized for investment until further action is taken by the governing body of Marshalltown:

1. Interest-bearing savings accounts, interest-bearing money market accounts, and interest-bearing checking accounts at any bank properly declared as a depository by the governing body of Marshalltown and not exceeding the amount allowed by Council resolution. Each bank must be on the most recent Approved Bank List as distributed by the Treasurer of the State of Iowa, or as amended as necessary by notice inserted in the monthly mailing by the Rate Setting Committee.
2. Obligations of the United States Government, its agencies, and instrumentalities, either an implicit or explicit backing of the full faith of the United States Government.
3. Certificates of deposit and other evidence of deposit at federally insured Iowa depository institutions approved and secured pursuant to Iowa Code Chapter 12C.6(3) shall draw rates not less than the minimum rate set under section 12C.6 for state funds.

Upon the departure of the City Treasurer, an acting City Treasurer or replacement shall be appointed immediately. The City Administrator may be appointed as acting City Treasurer or another person.

SECTION 6 - PROHIBITED INVESTMENTS AND INVESTMENT PRACTICES

Assets of Marshalltown shall not be invested in the following, according to Code of Iowa 12B.10 (5) and 12B.10 (9):

1. Reverse repurchase agreements.
2. Futures and options contracts.

Assets of Marshalltown shall not be invested pursuant to the following investment practices:

1. Trading of securities for speculation or the realization of short-term trading gains.
2. A contract providing for the investment or deposit of public funds shall not provide for compensation of an agent or fiduciary based upon investment performance.
3. If a fiduciary or other third parties with custody of public investment transaction records of Marshalltown fails to produce requested records when requested by this public body within a reasonable time, Marshalltown shall make no new investment with or through the fiduciary or third party and shall not renew maturing investments with or through the fiduciary or third party.
4. Contrary to existing bond covenants or investment resolutions and policy statements.

SECTION 7 - INVESTMENT MATURITY LIMITATIONS

Operating funds must be identified and distinguished from all other funds available for investment. Operating funds are defined as those funds which are reasonably expected to be expended during a current budget year or within fifteen months of receipt.

All investments authorized in Section 5 are further subject to the following investment maturity limitations:

1. Operating funds may only be invested in instruments authorized in Section 5 of this Investment Policy that mature within three hundred ninety-seven (397) days.
2. The City Treasurer and City Administrator may invest funds of Marshalltown that are not identified as Operating Funds in investments with maturities longer than three hundred ninety-seven (397) days. However, all investments of Marshalltown shall have maturities that are consistent with the needs and use of Marshalltown.

SECTION 8 - DIVERSIFICATION

Where possible, it is the policy of Marshalltown to diversify its investment portfolio. Assets shall be diversified to eliminate the risk of loss resulting from the over-concentration of assets in a specific maturity, a specific issue, or a specific class of securities. In establishing specific diversification strategies, the following general policies and contracts shall apply:

1. Portfolio maturities shall be staggered in a way that avoids undue concentration of assets in a specific maturity sector. Maturities shall be selected which provide stability of income and reasonable liquidity.

2. Liquidity practices to ensure that the next disbursement date and payroll date are covered through maturing investments, marketable U.S. Treasury bills, or cash on hand shall be used at all times.

SECTION 9 - COLLATERALIZATION OF CERTAIN OF MONIES

- A. Collateralization of deposits in banks in which deposits are in excess of the insurance of a federal agency or instrumentality shall be collateralized pursuant to the provisions of Section 12C, Subsection 22 of the Code of Iowa, related sections, and any future amendments thereto.

SECTION 10 - SAFEKEEPING AND CUSTODY

All invested assets of Marshalltown involving the use of public funds custodial agreement as defined in Iowa Code Section 12C shall comply with all rules adopted pursuant to Iowa Code Section 12C. All custodial agreements shall be in writing and shall contain a provision that all custodial services be provided in accordance with the laws of the State of Iowa.

SECTION 11 - INVESTMENT COMMITTEE

There has been established an investment committee composed of three persons, who are not City officers or employees, to be appointed by the Mayor, with Council approval, and possessing financial and investment backgrounds. The committee typically meets quarterly to review the City investments and their compliance with this policy. If no investments are being made due to low interest rates, the Committee may opt not to meet.

Appointments to the committee shall be for four years and the appointees shall serve without pay. Committee members may be re-appointed by the Mayor with the approval of the City Council.

SECTION 12 - REPORTING

The City Treasurer or Accounting Manager shall present an investment report that summarizes balances and any changes in activity since the last investment report to the Investment Committee referred to in Section 11. The investment report shall set out the current portfolio in terms of maturity, rates of return, and other features and summarize all investment transactions that have occurred during the reporting period.

SECTION 13 - INVESTMENT POLICY REVIEW AND AMENDMENT

The Investment Policy shall be reviewed every four years or more frequently as appropriate. Notice of amendments to the Investment Policy shall be promptly given to all parties noted in Section 1.

SECTION 14 - AUDIT AND REPORTING

There shall be an annual audit performed by an independent public accounting firm or auditors of the State of Iowa. Auditing services shall include unannounced investment verifications at least once annually as established by the City Council and the auditors.

SECTION 15 - DEFERRED COMPENSATION

The Marshalltown Investment Policy shall not apply to deferred compensation held by the City of Marshalltown for individual employees.