

STATEMENT OF INVESTMENT POLICY
FOR THE
CITY OF POMPANO BEACH GENERAL
EMPLOYEES' RETIREMENT SYSTEM

September 17, 2024

Introduction

The Board of Trustees of the City of Pompano Beach General Employees' Retirement System has established this Statement of Investment Policy. This policy has been identified by the Board as having the greatest expected investment return, and the resulting positive impact on asset values, funded status, and benefits, without exceeding a prudent level of risk. The Board determined this policy after evaluating the implications of increased investment return versus increased variability of return for a number of potential investment policies with varying commitments to different asset classes.

This Statement of Investment Policy is intended to complement the investment guidelines provided in applicable State Statutes, and local ordinances. The purpose of this Statement is to:

- 1) Provide the investment manager a more accurate understanding of the Trustees' investment objectives and,
- 2) Indicate the criteria by which the investment manager's performance will be evaluated.

INVESTMENT MANAGER RESPONSIBILITIES & CONTRACTS

- 1) Within the guidelines and restrictions set forth herein, it is the intention of the Board to give the investment manager full investment discretion, with respect to assets under its management. The investment manager shall discharge its responsibilities in the same manner as it would if the Fund were governed by the fiduciary responsibility provisions of the Employee Retirement Income Security Act of 1974 (ERISA). Although the Fund Trustees acknowledge that ERISA does not apply to a governmental fund, it hereby imposes the fiduciary provisions of ERISA upon the investment manager whose performance shall conform to the statutory provisions, rules, regulations, interpretations and case law of ERISA. The investment manager shall acknowledge, in writing, that it is a named fiduciary of the Fund.
- 2) The investment manager is expected to provide any reasonable information requested by the Board of Trustees. At a minimum, each manager shall provide a quarterly report detailing their investment activity, the portfolio's current value, and any changes in investment philosophy or strategy. The Firm's investment manager is expected to meet with the Board of Trustees at least once per year. A designated representative will meet with the Board of Trustees, as requested.
- 3) Unless otherwise provided by the Custodian, the investment manager will monitor portfolio activity to minimize non-invested cash balances.
- 4) The investment manager shall be responsible only for those assets under its management. It will be the responsibility of the investment manager to review the monthly valuations provided by the Custodian and to note, in writing, any significant discrepancies from the valuations provided in their own reports.
- 5) In entering into any investment agreement, it is the Policy of the Fund not to provide indemnification.

Florida Statute 112:

1. **EXPECTED ANNUAL RATE OF RETURN:** With consideration to rates of return from different asset classes, the Board of Trustees has crafted its investment program in order to deliver an expected rate of return similar to that of the actuarial assumed rate. The Board shall determine for each actuarial valuation, the total expected annual rate of return for the current year, for each of the next several years and for the long term thereafter. The total expected annual rate of return is anticipated to be similar to the actuarial assumed rate of return. This determination is to be filed with the Department of Management Services and with the plan sponsor and consulting actuary.
2. **CONTINUING EDUCATION:** The Board of Trustees relies on its consultants and professionals to provide continuing education on pension and investment issues. The Board of Trustees also recognize state and regional conferences as a source of continuing education. The Trustees are encouraged to attend conferences, schools, and other functions periodically in order to fulfill this requirement.
3. **FILING OF INVESTMENT POLICY:** The investment policy is to be promptly filed with the Department of Management Services, plan sponsor and consulting actuary. The effective date of the investment policy and any amendment thereto shall be the 31st calendar day following the filing date with the plan sponsor.

COMPLIANCE WITH CHAPTER 2023-28, LAWS OF FLORIDA

The Board and its investment managers shall comply with the applicable requirements of Chapter 2023-28, Laws of Florida, including Section 112.662, along with regulations adopted by the Department of Management Services.

1. Definition of pecuniary factor: The term “pecuniary factor” is defined as a factor that an investment fiduciary “prudently determines is expected to have a material effect on the risk or returns of an investment based on appropriate investment horizons consistent with the investment objectives and funding policy of the retirement system. The term does not include the consideration of the furtherance of any social, political, or ideological interests.” [112.662(1)]
2. Exclusive consideration of pecuniary factors: Only pecuniary factors may be considered, and the interests of the participants and beneficiaries of the system may not be subordinated to other objectives, including sacrificing investment return or undertaking additional investment risk to promote any nonpecuniary factor. The weight given to any pecuniary factor must appropriately reflect a prudent assessment of its impact on risk or returns. [112.662(2)]
3. Proxy voting: Only pecuniary factors may be considered when voting proxies. [112.662(3)]
4. Filing requirements: The Board shall timely comply with the reporting requirement of Section 112.662 by filing a comprehensive report by December 15 of each odd-numbered year. [112.662(4)]. Investment managers and the Board’s investment consultant shall assist in the preparation of required reports and shall annually confirm to the Board their compliance with Chapter 2023-28.
5. Contracting and external communication requirements: Manager contracts shall comply with Section 215.855 as follows:

Any written communication made by an investment manager to a company in which such manager invests public funds on behalf of the Board must include the following disclaimer in a conspicuous location if such communication discusses social, political, or ideological interests; subordinates the interests of the company’s shareholders to the interest of another entity; or advocates for the interest of an entity other than the company’s shareholders:

The views and opinions expressed in this communication are those of the sender and do not reflect the views and opinions of the people of the State of Florida.

6. The Investment Consultant will provide Investment Managers for consideration who invest only based on pecuniary factors as defined by Florida Statutes §112.662.
7. If a Request for Proposals document is issued for Investment Manager services, the solicitation document must include the following:

The Board of Trustees may not request documentation of or consider a vendor’s social, political, or ideological interests when determining if the vendor is a responsible vendor. Additionally, the Board of Trustees may not give preference to a vendor based on vendor’s social, political, or ideological interests.

GENERAL OBJECTIVES

The primary investment objective of the City of Pompano Beach General Employees' Retirement System is the preservation of invested capital. The secondary objective is to achieve moderate long-term real growth of the assets while minimizing the volatility of returns.

To achieve these objectives, the Board of Trustees seeks to create well-diversified and balanced portfolio of assets and asset classes managed in separate accounts, mutual funds, commingled funds, and/or limited partnerships. The Board has determined that one or more outside investment managers may be retained to assure that all investments are managed in both a prudent and professional manner and in compliance with the stated investment guidelines.

INVESTMENT OBJECTIVES

Investment objectives are intended to provide quantifiable benchmarks to measure and evaluate portfolio return and risk. Most investment styles require a full market cycle to allow an investment manager to demonstrate his abilities. A full market cycle is defined as a three to five-year time period. As a result, performance objectives will be measured over three to five year periods. Monitoring shorter periods may be used to determine the trend of performance premiums or deficiencies.

The specific investment objectives of the City of Pompano Beach General Employees' Retirement System are as follows:

Absolute Return Objective: The Goal of the Pompano Beach General Employees' Retirement System shall be to achieve an average annual rate of return equal to or greater than **applicable assumed rate of return** over the longer term. This absolute return objective will be evaluated in the context of the prevailing investment market conditions.

Market Return Objective: In order to provide a reference of fund return and risk relative to a similar basket of passive assets, the board has developed a "Target Index". The fund's objective is to achieve a rate of return over the long term (3 to 5 years), which exceeds the return of a Target Index.

The Target Index for the City of Pompano Beach General Employees' Retirement System is a passive mix of benchmarks in weightings similar to the strategic asset allocation. The Target Index is identified in **Exhibit A**.

Peer Return Objective: It is expected that the total rate of return earned by the Fund and the returns earned by the stock and bond portions of the portfolio will each rank above in the **Top 50%** when compared to a representative universe of other, similarly managed portfolios.

Volatility: The volatility of the Fund's total returns is expected to be similar to that of the Target Index and will be evaluated accordingly.

The above investment objectives have been established for the entire City of Pompano Beach General Employees' Retirement System. The specific investment objectives for each investment manager or fund investment will be outlined in Exhibit B.

INVESTMENT GUIDELINES / MANAGER BENCHMARKS

The Board of Trustees has established the target asset allocation for the entire Pompano Beach General Employees Retirement System as outlined in **Exhibit A**. Specific asset manager/fund assignments, including comparative benchmarks and peer universes, are listed in **Exhibit B**.

The Board has chosen to engage specialty managers for each asset class. The Board intends to review each asset class and/or manager portfolio quarterly. The trigger for rebalancing has been identified as when the market value of any asset class/manager portfolio increases or decreases outside the permissible ranges listed above. The Board of Trustees intends to evaluate asset valuations quarterly to make the necessary adjustments to achieve compliance with these guidelines.

In accordance with the policies established by the Board of Trustees, the assets of the Pompano Beach General Employees' Retirement System shall be invested in a diversified portfolio of securities, funds, and/or pooled assets. Separate account portfolios managed by outside investment advisors and holding individual securities must comply with the following guidelines.

EQUITY SECURITIES:

Equity strategies in commingled, mutual fund, or limited partnership structures are guided by the prospectus, subscription agreement, or governing document of that investment, and the Board recognizes that no further restrictions can be put on these investments. Equity securities held by asset managers in separate account structures must comply with the following guidelines:

- 1) Investments in equity securities (and funds representing public equity exposure) shall be limited to the ranges identified in **Exhibit A**.
- 2) All equity investments shall be limited to fully and easily negotiable equity securities.
- 3) No more than 5% at cost value of an investment manager's equity portfolio may be invested in the shares of a single corporate issuer.
- 4) The board may achieve diversification in foreign equity through commingled or institutional mutual fund vehicles. These pooled investments are considered an investment in foreign securities.
 - a) American Depository Receipts (ADRs) are United States dollar-denominated securities listed and traded on a United States exchange and are considered part of the ordinary investment strategy of the Board. ADR securities are not considered foreign securities and may be purchased by separate account managers without limitation.
- 5) Investment in those corporations whose stock has been publicly traded for less than one year is limited to **15%** of any separate account portfolio.

FIXED INCOME SECURITIES:

Fixed income strategies in commingled, mutual fund, or limited partnership structures are guided by the prospectus, subscription agreement, or governing document of that investment, and the Board recognizes that no further restrictions can be put on these investments. Fixed income securities held by asset managers in separate account structures must comply with the following guidelines:

- 1) Credit and duration risk:
 - a. The average credit quality of the bond portfolio shall be "**A**" or higher.
 - b. The duration of the fixed income portfolio shall not exceed **135%** of the duration of the market index. The market index is defined as the Bloomberg Aggregate Bond Index.
- 2) Investments in all corporate fixed income securities shall be limited to:
 - a. Those securities rated below "**BBB**" shall not exceed **15%** of the investment manager's total fixed income portfolio.
 - b. no more than **5%** at cost of an investment manager's total fixed income portfolio shall be invested in the securities of any single corporate issuer.
- 3) There is no limit imposed on investments in fixed income securities issued directly by the United States Government or any agency or instrumentality thereof.

REAL ESTATE:

- 1) Investment in real estate is limited to the ranges identified in **Exhibit A**.
- 2) All real estate investments shall be made through participation in diversified commingled funds of real properties. These funds shall be broadly diversified as to property type and location.
- 3) Experienced and professional real property investment managers shall manage all real estate investments.

ABSOLUTE RETURN:

- 1) Investments in absolute or real return is limited to the ranges identified in **Exhibit A**.
- 2) All absolute or real return investments shall be made through participation in diversified commingled funds, mutual fund or limited partnership vehicles.
- 3) The Board considers absolute return as those strategies with a stable and consistent return expectation that are not tied to any asset class or benchmark. These strategies may include but not be limited to infrastructure, tactical asset allocation, or market neutral. The Board of Trustees shall endeavor to consider those investments that offer liquidity, transparency and low relative fees.

PRIVATE EQUITY:

- 1) Investments in private equity strategies is limited to the ranges identified in **Exhibit A**.
- 2) All private equity shall be made through participation in diversified limited partnership vehicles.
- 3) The board shall endeavor to consider those investments that offer liquidity, transparency and low relative fees.

PRIVATE CREDIT:

- 1) Investments in private credit strategies is limited to the ranges identified in **Exhibit A**.
- 2) All private credit shall be made through participation in diversified limited partnership vehicles.
- 3) The board shall endeavor to consider those investments that offer liquidity, transparency, and low relative fees.

CASH EQUIVALENT & TREASURY SECURITIES:

- 1) Investments in cash and equivalents is limited to the ranges identified in **Exhibit A**.
- 2) The investment manager may invest only in the following short term investment vehicles:
 - a. The money market or STIF provided by the Plan's custodian.
 - b. Direct obligations of the United States Government with a maturity of one year or less.
 - c. Commercial Paper with a maturity of 270 days or less that is rated A-1 by Standard & Poor's or P-1 by Moody's.
 - d. Bankers Acceptances issued by the largest 50 banks in the United States (in terms of total assets).
- 3) The plan may invest in treasury assets that meet the following criteria:
 - a. Treasury assets should represent a store of value with the expectation of keeping up with inflation. These may include but are not limited to ETFs or ETNs representing gold, US T-bills, and cryptocurrency.
 - b. Fully liquid securities listed on one or more recognized U.S. national stock exchanges (including NASDAQ).
 - c. Should be considered Level 1 assets according to FASB 157.

PROHIBITED SECURITIES:

Only those derivative securities expressly described herein are permissible for all separate account portfolio managers.

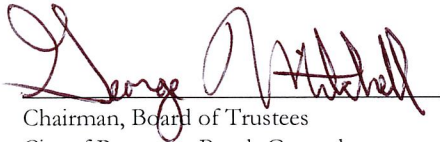
MUTUAL FUNDS / COMMINGLED FUNDS / LIMITED PARTNERSHIPS:

The Board of Trustees recognizes and accepts that commingled, mutual fund, and limited partnership investments will be dictated by the investment policies and guidelines of those funds and that no additional constraints may be imposed on them. The decision to make a direct investment in any vehicle will only be made by the Board of Trustees after a thorough review of the policies of the governing documents of those funds and after it has been determined that those policies are appropriate and materially and substantially consistent with the investment objectives.

REVIEW OF POLICY

It is the intention of the Board of Trustees of the City of Pompano Beach General Employees' Retirement System to review this Statement of Investment Policy and its addenda periodically to amend it to reflect any changes in philosophy or objectives. However, if at any time the investment manager believes that the specific objectives defined herein cannot be met or that these guidelines unnecessarily constrict performance, the Board shall be so notified in writing.

Adopted this 17th day of September 2024.



Chairman, Board of Trustees
City of Pompano Beach General
Employees' Retirement System

09/17/2024
Date

EXHIBIT A

ASSET ALLOCATION				
Asset Class	Target Allocation (at market)	Minimum Allocation (at market)	Maximum Allocation (at market)	Representative Benchmark
Equity:				
Large Cap Equity	35%	20%	45%	Russell 1000
Small and Mid-Cap Equity	15%	5%	25%	Russell 2500 / 2000
Foreign Equity	5%	0%	15%	MSCI EAFE
Total Equity	55%	65% Max Limit*		
Alternative & Private Investments:				
Direct Real Estate	10%	5%	20%	NCREIF
Absolute Return (Infra/Maritime)	5%	0%	15%	CPI + 3%
Private Equity	5%	0%	15%	CPI + 3%
Private Credit	5%	0%	15%	CPI + 3%
Total Alternative & Private	25%			
Fixed Income				
Traditional Fixed Income	5%	0%	20%	Bloomberg Intermediate Aggregate
Alternative Fixed Income	10%	0%	20%	Bloomberg Intermediate Aggregate
Total Fixed Income	15%			
Cash Equivalents & Treasury Assets	5%	0%	10%	T-Bills
Total Cash Equivalent & Treasury Assets	5%			

* The max limit in combined equity exposure is meant as a signal to rebalance and should not be considered a technical default of the investment policy.

EXHIBIT B

Actively managed strategies / funds are expected to meet or exceed the stated policy benchmark and to rank above average to its comparative universe over a three to five-year period. Passive investments are expected to replicate their respective benchmarks and will be ranked against comparative universes for informational purposes. Passive funds are not expected to rank above average -v- a sample of active managers. The Board of Trustees will place an actively managed strategy “under review” if these performance expectations are not met over a 3-5-year period. The Board of Trustees may place an actively managed strategy “under review” if the standard deviation of returns is considered inappropriate based on the unique characteristics of each strategy.

Asset Manager	Policy Benchmark	Comparative Universe
DePrince Race & Zollo	Russell 1000 Value Index	Large Cap Value Universe
Rhumblin (3 Funds)	R1000 / R1000G / S&P600 Index	Large Cap Core / Growth / Small Cap Universes
Atlanta Capital	Russell 2500 Index	Small / Mid Cap Universe
American Funds EuroPacific Fund	MSCI EAFE Index	International Equity Universe
Invesco Oppenheimer Intl Growth	MSCI EAFE Index	International Equity Universe
Principal U Core+	NCREIF ODCE Index	Domestic Real Estate Universe
American Realty Core	NCREIF ODCE Index	Domestic Real Estate Universe
TA Realty Core	NCREIF ODCE Index	Domestic Real Estate Universe
JPM Infrastructure	CPI+3%	N/A
JPM Maritime	CPI+3%	N/A
Taurus Fund II	CPI+3%	N/A
Constitution VI	CPI+3%	N/A
Capital Dynamics (2 Funds)	CPI+3%	N/A
ATFL	CPI+3%	N/A
Pennant Park	CPI+3%	N/A
Partners For Growth	CPI+3%	N/A
Richmond Capital	Bloomberg Intermediate Agg Index	Intermediate Fixed Income Universe
Serenitas Credit Gamma	CPI + 3% / Bloomberg Intermediate Agg Index	Intermediate Fixed Income Universe
Radcliffe Ultra Short Duration	Bloomberg US 1-3 Index	Short-Term 1-3 Fixed Income Universe