



AEG FOUNDATION
POLICY NUMBER F-1
INVESTMENT POLICY

Source notes: Modified with permission from a template published by Barbara Rosen. Original source: sample policy published by the National Council of Nonprofits.

Note: In this policy, the AEG Foundation is referred to as the “Organization” and its Board of Directors may be referred to as the “Board.”

PURPOSE OF INVESTMENT POLICY

The purpose of this Investment Policy is to provide a clear statement of the Organization’s investment objective, to define the responsibilities of the Board and any other parties involved in managing the Organization’s investments, and to identify or provide target asset allocations, permissible investments, and diversification requirements.

INVESTMENT OBJECTIVE

The overall investment objective of the Organization is to maximize the return on invested assets while controlling risk and expenses. This is done through prudent investing and planning, as well as through the maintenance of a diversified portfolio.

GENERAL PROVISIONS

- All transactions shall be for the sole benefit of the Organization.
- The Board shall consider updating the Organization’s investment policy on an annual basis.
- The Board shall conduct, or cause to be conducted, an annual review of the Organization’s investment assets to verify the existence and marketability of the underlying assets or satisfy them that such a review has been conducted in connection with an independent audit or review of the Organization’s financial statements.

AEG Foundation – Investment Policy

- Any investment that is not expressly permitted under this Policy must be formally reviewed and approved by the Board (or the Investment Committee).
- The Board will endeavor to operate the Organization's investment program in compliance with all applicable state, federal and local laws and regulations concerning management of investment assets.
- Investments shall be diversified within the range of permitted investments, with a view to moderating risk.
- This policy applies to all positions held in the organization's brokerage account. This policy does not apply to financial assets held outside of the organization's brokerage account.

DELEGATION OF RESPONSIBILITY; RELIANCE ON EXPERTS AND ADVISORS

- The Board has ultimate responsibility for the investment and management of the Organization's investment assets.
- The Board may delegate authority over the Organization's investments to a properly formed and constituted Investment Committee, being a Board Committee comprised only of directors.
- The Board or Board Committee may hire outside experts as investment consultants or investment managers. An Investment Manager may serve with or without compensation, but all investment managers shall serve only under the terms of this policy and by written agreement with the board.
- The Board may also establish an advisory committee (which may include non-directors) to provide investment advice to the Board or to the Board Committee. Advisory committees have no authority to act for the Board, but may monitor compliance with the investment policy, recommend changes, and assist the Board or Board Committee in selecting and retaining Investment Managers to execute this Investment Policy.

RESPONSIBILITIES OF THE BOARD, OR IF AUTHORITY IS DELEGATED, THE INVESTMENT COMMITTEE

- The Board, or if authority is delegated, the Investment Committee, is charged with the responsibility of managing the investment assets of the Organization. The specific responsibilities of the Board or the Investment Committee, as applicable, include:
 1. Communicating the Organization's financial needs to the Investment Managers on a timely basis.
 2. Determining the Organization's risk tolerance and investment time horizon and communicating these to the appropriate parties.
 3. Establishing reasonable and consistent investment objectives, policy guidelines and allocations which will direct the investment of the assets, to be reviewed by the Board on an annual basis.
 4. Prudently and diligently selecting one or more qualified investment professionals, including investment managers(s), investment consultant(s), and custodian(s).
 5. Regularly evaluating the performance of the Investment Manager to assure adherence to policy guidelines and to monitor investment objective progress.
 6. Developing and enacting proper control procedures; e.g., replacing investment manager(s) due to a fundamental change in the investment management process, or for failure to comply with established guidelines.

RESPONSIBILITIES OF THE INVESTMENT MANAGER

- The Investment Manager will invest assets placed in his, her or its care in accordance with this investment policy.
- Each investment manager must acknowledge in writing acceptance of responsibility as a fiduciary.
- Each investment manager will have full discretion in making all investment decisions for the assets placed under his, her or its care and management, while operating within all policies, guidelines, constraints, and philosophies outlined in this Investment Policy. The Investment Manager may confer with the Investment Committee through its Chair at any time. Specific responsibilities of investment manager(s) include:

AEG Foundation – Investment Policy

1. Discretionary investment management, including decisions to buy, sell, or hold individual securities, and to alter allocation within the guidelines established in this statement.
2. Reporting, on a timely basis, monthly investment performance results.
3. Communicating any major changes in the economic outlook, investment strategy, or any other factors that affect implementation of investment process.
4. Informing the Board, or if authority is delegated, the Investment Committee, regarding any changes in portfolio management personnel, ownership structure, investment philosophy, etc.
5. Voting proxies, if requested by the Board, or if authority is delegated, the Investment Committee, on behalf of the Organization.
6. Administering the Organization's investments at reasonable cost, balanced with avoiding a compromise of quality. These costs include, but are not limited to, management and custodial fees, consulting fees, transaction costs and other administrative costs chargeable to the Organization.

GENERAL INVESTMENT GUIDELINES

- At the direction of the Board (or Investment Committee), the Investment Manager shall maintain three separate subportfolios, dedicated, respectively, to (A) seeking capital gains), (B) dividend growth stocks, and (C) current income through dividends and interest. Related to total portfolio value (excluding cash and cash equivalents), the allocation range for each subportfolio is: (A) Capital Gains, 0-5%, (B) Dividend Growth, 5-15%, and (C) Current Income, 80-95%.
- A copy of this Investment Policy shall be provided to all Investment Manager.
- The Organization is a tax-exempt organization as described in section 501(c)(3) of the Internal Revenue Code. This tax-exempt status should be taken into consideration when making Organization investments.
- The Organization is expected to operate in perpetuity; therefore, an appropriate multi-year investment horizon shall be employed (except for that part of the portfolio designated for capital appreciation investment). Interim fluctuations should be viewed with appropriate perspective.

AEG Foundation – Investment Policy

- A cash account shall be maintained as described in the Operating Reserve Fund Policy with a zero to very low risk tolerance to keep cash available for grant distributions and anticipated expenses (including Fundraising expenses and General and Administrative expenses).
- Transactions shall be executed at reasonable cost, taking into consideration prevailing market conditions and services and research provided by the executing broker.
- Permitted investments include: Cash and cash equivalents, money market funds, and marketable securities including equities and fixed income securities.
- No fixed income security shall have an equivalent credit quality below investment grade at the time of purchase, defined as:
 1. BBB by Standard & Poors for straight bonds and convertibles
 2. Baa3 by Moody's Investor Service for straight bonds and convertibles
 3. A1 by Standard & Poors for short term securities
 4. P1 by Moody's Investor Service for short-term securities
 5. AAA for money market accounts
- The following transactions are prohibited: Purchase of non-negotiable securities, derivatives, high risk or junk bonds, private placements, precious metals, commodities, short sales, any margin transactions, straddles, warrants, options, life insurance contracts, leverage or letter stock.
- The Investment Manager shall monitor closed-end fund distributions for return of capital and shall report any return of capital to the Investment Committee at least quarterly.

DIVERSIFICATION

- The Organization will maintain a reasonable diversification of investment assets between asset classes and investment categories at all times. (The Board recognizes that the goal of a strong stream of current investment income from interest and dividends can result in relative underrepresentation of certain types of securities in times of low interest rates.)

AEG Foundation – Investment Policy

- Investments in the equity securities of any one company or investment fund shall not exceed 7.5% of the portfolio total value (not including cash or equivalent) nor shall the total securities position (debt and equity) in any one company exceed 10% of the portfolio value.
- Reasonable sector allocations and diversification shall be maintained. No more than 25% of the entire portfolio may be invested in the securities of any one sector.
- Investments within the investment portfolio should be readily marketable.
- The investment portfolio should not be a blind pool; each investment must be available for review.

ASSET ALLOCATION

- The asset allocation policy shall be predicated on the following factors:
 1. Historical performance of capital markets adjusted for the perception of the future short and long-term capital market performance.
 2. The correlation of returns among the relevant asset classes.
 3. The perception of future economic conditions, including inflation and interest rate assumptions.
 4. Liquidity requirements for the projected grants and other charitable expenditures.
 5. The relationship between the current and projected assets of the Organization and projected liabilities.
 6. Rebalancing shall be done on a semi-annual basis or more frequently if deemed necessary.

SUBPORTFOLIOS

Total invested holdings shall be divided into three subportfolios with individual investment goals, as shown in Table One.

TABLE ONE: TARGET RANGES OF ASSETS FOR THREE SUBPORTFOLIOS. (As a percent of total invested funds, not including any cash and equivalent positions such as: operating cash (Johnston Fund), cash awaiting deployment to program and operating funds (Greatest Needs Fund), cash awaiting investment, and operating reserves.)

SUBPORTFOLIO>>>>>>>	A: Capital Gains	B: Dividend Growth	C: Current Income
TARGET ALLOCATION RANGE >	0-5%	5-15%	80-95%

ALLOCATION RANGES BY ASSET CLASS

Table Two shows target ranges of asset allocation by asset class for all three subportfolios.

TABLE TWO: TARGET ASSET ALLOCATION RANGES BY ASSET CLASS FOR THREE SUBPORTFOLIOS

SUBPORTFOLIO >>>>>>>>>	A: Capital Gains Portfolio	B: Dividend Growth Portfolio	C: Current Income Portfolio
Common Stocks (Chiefly for capital gains)	80-100%	N/A	N/A
Common Stock (Chiefly for long term dividend growth)	N/A	90-100%	N/A
Common Stock (Chiefly for current dividend income)	N/A	N/A	<35%
US Corporate Bonds and Funds. (Chiefly for current interest income)	N/A	N/A	<25%
US Treasury Bonds, Notes, and Bills	N/A	N/A	<35%
US Gov't Agency Bonds	N/A	N/A	<35%
Preferred Stocks (Chiefly for dividend income)	<2%	N/A	<35%
Preferred Stock Closed-end funds. (Chiefly for dividend income)	N/A	N/A	<35%

PERFORMANCE

- Performance objectives are to be met on a net of fees basis. The investment performance of each asset allocation class will be measured on two levels: against inflation objectives for the total Organization and against index objectives for individual portfolio components. Investment performance shall be measured no less than quarterly on a net of fees

AEG Foundation – Investment Policy

basis. Performance shall be evaluated on a three-to-five-year basis to allow for market fluctuations and volatility.

Adopted by the Board of Directors on March 19, 2022



Rosalind Munro, Secretary

