

170 / General Policies

Investment of Library Funds

Policy

Under this instrument, the Board of Library Trustees of the Village of Villa Park creates its Investment Policy. It is the policy of the library to invest all funds under the library's control in a manner which will provide the highest investment return using authorized instruments, while meeting the library's daily cash flow demands and in conformance with all State statutes governing the investment of public funds.

This policy shall apply to all investments entered into on or after the effective date of this instrument.

Investment Guidelines

The primary objective in the investment of library funds is to ensure the safety of principal, while managing liquidity to pay the financial obligations of the library, and providing the highest investment return using authorized instruments.

Safety

The safety of principal is the foremost objective of the investment program. Library investments shall be undertaken in a manner which seeks to ensure the preservation of capital in the portfolio. To attain this objective, diversification, as defined in this policy, is required to ensure that the library prudently manages market, interest rate and credit risk.

Liquidity

The investment portfolio shall remain sufficiently liquid to enable the library to meet all operating requirements which might be reasonably projected.

Return on Investment

The investment portfolio shall be designed to obtain the highest available return, taking into account the library's investment risk constraints and cash flow needs and the library's desire to promote fiscal responsibility. The portfolio shall seek to obtain the highest investment return using authorized investments during budgetary and economic cycles as mandated in this policy. The rate of return achieved on the library's portfolio will be measured against relevant industry benchmarks at regular intervals to determine the effectiveness of investment decisions in meeting investment goals.

Periodic Review of Investment Portfolio

The investment advisor or advisors appointed by the Board of Library Trustees pursuant to this policy shall make a periodic review, quarterly, of the library's investment portfolio, its effectiveness in meeting the library's needs for safety, liquidity, rate of return, and diversification, and the general performance of such portfolio. The investment advisor shall report to the Library Director of the library on an "as needed" basis, and shall report to the

Board of Library Trustees at least quarterly.

Prudence

Investments shall be made with the judgment and care under the circumstances then prevailing which persons of prudence, discretion and intelligence exercise in the management of their own affairs, not for speculation, but for investment, considering the probable preservation of their capital as well as the probable income to be derived. This "prudent person" standard shall be used by all Chief Investment Officer of the library and shall be followed in making investments for the library and in managing those investments.

Ethics and Conflicts of Interest

Authorized Chief Investment Officer of the library, Library Trustees and employees in policy-making positions shall refrain from personal business activity that could conflict, or give the appearance of a conflict with proper execution of the investment program, or which could impair their ability to make impartial investment decisions. Such individuals shall disclose to the library any material financial interests in financial institutions which conduct business with the library, and they shall further disclose any personal financial investment positions that could be related to the performance of the investment portfolio. In addition, such individuals shall subordinate their personal investment transactions to those of the investment portfolio, particularly with regard to the time of purchases and sales.

No person acting as Chief Investment Officer, Treasurer or financial officer for the library, Library Trustee or who is employed in any similar capacity by or for the library, may do any of the following:

- have any financial interest, directly or indirectly, in any investments in which the library is authorized to invest.
- have any financial interest, directly or indirectly, in the sellers, sponsors, or managers of those investments.
- receive, in any manner, compensation of any kind from any investments in which the library is authorized to invest.

Authorized Broker/Dealers and Financial Institutions

- Authorized Chief Investment Officer shall utilize the library's approved list of financial institutions when selecting institutions to provide investment services. No public deposit shall be made except as authorized by the Illinois Public Funds Investment Act (30 ILCS 235/0.01 et seq.). In addition, should the library determine to invest through the service of a broker/dealer, a list shall be maintained of approved security broker/dealers selected according to their creditworthiness, and their financial efficiency in serving the library, which shall be measured in terms of the location of the broker/dealer's corporate office, the number of full-time employees, the size of its payroll, and the extent to which the broker/dealer has an economic value to the library. The list may include "primary" dealers or regional dealers which qualify under Securities and Exchange Commission Rule 240.15c3-1 (Net Capital Requirements For Brokers Or Dealers).
- All financial institutions and broker/dealers who want to qualify to bid for

investment transactions must initially, and on a periodic basis upon request, provide to the library's authorized Chief Investment Officer the following, where applicable:

- Audited financial statements;
 - Proof of minority/female/disabled broker status;
 - A trading resolution;
 - Proof of State of Illinois registration;
 - Completed Broker/Dealer Questionnaire;
 - Certification of notice and knowledge of the library's Investment Policy;
 - Published reports for brokers from rating agencies with investment grade ratings;
 - Proof of emerging broker status; and
 - Consolidated Reports of Condition and Income.
- An annual review of the financial condition and registration of qualified bidders will be conducted by the library's authorized Chief Investment Officer. More frequent reviews may be conducted if warranted.
 - A current audited financial statement is required to be on file for each financial institution and broker/dealer with which the library establishes a depository, trading, or safekeeping relationship. Qualified bidders shall submit annual audited financial statements and shall submit financial statements when a material change occurs in the financial condition or registration of qualified bidders.

Authorized and Suitable Investments

As of the effective date of this policy, the list of authorized investments shall include the following as authorized by Section 2 of the Public Funds Investment Act (30 ILCS 235/2):

- Bonds, notes, certificates of indebtedness, treasury bills, or other securities now or hereafter issued, that are guaranteed by the full faith and credit of the United States of America as to principal and interest;
- Bonds, notes, debentures or other similar obligations of the United States of America, or its agencies and instrumentalities; For purposes of this policy, the term "agencies of United States of America" includes (i) the federal land banks, federal intermediate credit banks, banks for cooperative, federal farm credit banks, or any other entity authorized to issue debt obligations under the Farm Credit Act of 1971 (12 U.S.C. 2001 et seq.) and Acts amendatory thereto; and (ii) the federal home loan banks and the Federal Home Loan Mortgage Corporation; and any other agency created by Act of Congress.
- Interest-bearing savings accounts, interest-bearing certificates of deposit, interest-bearing time deposits, or any other investments constituting direct obligations of any bank as defined by the Illinois Banking Act (205 ILCS 5/1 et seq.), provided, however, that such investments may be made only in banks which are insured by the Federal Deposit Insurance Corporation;
- Short-term obligations of corporations organized in the United States with assets exceeding \$500,000,000 if (i) such obligations are rated at the time of purchase at one of the three highest classifications established by at least two standard rating services and which mature not later than 270 days from

the date of purchase, (ii) such purchases do not exceed 10% of the corporation's outstanding obligations, and (iii) no more than one-third of the library's funds are invested in short-term obligations of corporations;

- Money market mutual funds registered under the Investment Company Act of 1940 (15 U.S.C.A. ' 80a-1 et seq.), provided that the portfolio of the money market mutual fund is limited to obligations described in Section 2(a)(1) and (2) of the Public Funds Investment Act (30 ILCS 235/2(a)(1) and (2));
- Short term discount obligations of the Federal National Mortgage Association (established by or under the National Housing Act (1201U.S.C. 1701 et seq.)), or in shares or other forms of securities legally issuable by savings banks or savings and loan associations incorporated under the laws of Illinois or any other State or under the laws of the United States, provided, however, that the shares or investment certificates of such savings banks or savings and loan associations are insured by the Federal Deposit Insurance Corporation;
- Dividend-bearing share accounts, share certificate accounts, or class of share accounts of a credit union chartered under the laws of the State of Illinois or the laws of the United States; provided, however, the principal office of the credit union must be located within the State of Illinois; and, provided further, that such investments may be made only in those credit unions the accounts of which are insured by applicable law.
- The Public Treasurer's Investment Pool created under Section 17 of the State Treasurer Act (15 ILCS 505/17) or in a fund managed, operated, and administered by a bank, subsidiary of a bank, or subsidiary of a bank holding company, or use the services of such an entity to hold and invest or advise regarding the investment of any public funds.
- Repurchase agreements of government securities having the meaning set out in the Government Securities Act of 1986 (15 U.S.C.A. ' 780-5) subject to the provisions of that Act and the regulations issued thereunder, provided, however, that such government securities, unless registered or inscribed in the name of the library, shall be purchased through banks or trust companies authorized to do business in the State of Illinois; and such other repurchase agreements as are authorized in subsection (h) of Section 2 of the Public Funds Investment Act (30 ILCS 235/2). Repurchase agreements may be executed only with approved financial institutions or broker/dealers meeting the library's established standards, which shall include mutual execution of a Master Repurchase Agreement adopted by the library.

Investment Restriction

- Authorized Chief Investment Officer shall not invest in tri-party repurchase agreements or derivative products, and will not leverage assets through reverse repurchase agreements.
- Except for repurchase agreements of government securities which are subject to the Government Securities Act of 1986, the library shall not purchase or invest in instruments which constitute repurchase agreements, and no financial institution may enter into such an agreement with or on behalf of the library unless the instruments and the transaction meet the

requirements of Section 2(h) of the Illinois Public Funds Investment Act (30 ILCS 235/2(h)).

- Repurchase agreements may be executed only with approved financial institutions or broker/dealers meeting the library's established standards, which shall include a mutual execution of a Master Repurchase Agreement adopted by the library.

Collateralization

Collateralization will be required above depository insured amounts on two (2) types of library investments:

- **Deposit Collateralization:** Collateral securities approved by the library with a market value equal to at least 110% of deposits in excess of \$250,000 per institution shall be required. The collateral shall be marked to market and adjusted, if necessary, to the 110% level on at least a weekly basis. Insured certificates of deposit, share certificates, surety bonds and letters of credit with a value of at least 102% of deposits in excess of \$250,000 per institution shall be required.
- **Repurchase Agreement Collateralization:** Direct treasury securities with a market value equal to at least 102% of the value of the repurchase agreement shall be maintained at all times. Repurchase agreement collateral shall be marked to market at the time of execution, and daily thereafter.

Diversification

The investment portfolio shall be diversified to eliminate the risk of loss resulting from concentration of assets in a specific maturity, a specific issuer or a specific class of securities. In order to properly manage any risk attendant to the investment of library assets, the portfolio shall not exceed the following diversification limits unless specifically authorized by the library:

- The library shall seek to achieve diversification in the portfolio by distributing investments among authorized investment categories among financial institutions, issuers and broker/dealers;
- The investment portfolio shall at no time hold time deposits constituting more than 10% of any single financial institution's total deposits;
- No investment category shall exceed 40% of the Library's portfolio, with the exception of cash equivalents and treasury securities as defined in this policy; and
- The library shall invest the majority of library funds in authorized investments of less than one (1) year maturity. No investment shall exceed two (2) years maturity.

Sustainability Factors

Material, relevant, and decision-useful sustainability factors shall be regularly considered by the Board of Library Trustees, within the bounds of financial and fiduciary prudence, in evaluating investment decisions. Such factors include, but are not limited to: (i) corporate governance and leadership factors; (ii) environmental factors; (iii) social capital factors; (iv) human capital factors; and (v) business model and innovation factors, as provided under the Illinois Sustainability

Investing Act.

In addition, the Board of Library Trustees shall, on an annual basis, determine the carbon footprint of its investment portfolio in its use of public funds, and make available to the public a report of the findings. In determining the carbon footprint of its investment portfolio, the Board of Library Trustees may utilize financial data providers to aid in the collection of the required information.

Safekeeping and Custody

All security transactions entered into by the library shall be conducted on a delivery-versus-payment (DVP) or receipt-versus-payment (RVP) basis. Securities shall be held by a safekeeping agent designated by the library, and evidenced by safekeeping receipts.

Internal Controls

The library's investment advisor(s) shall establish a library of internal controls, which shall be documented in writing and filed with the library's Board of Library Trustees for review. The controls shall be designed to prevent losses of public funds arising from fraud, employee error, misrepresentation by third parties, unanticipated changes in financial markets or imprudent actions by authorized Chief Investment Officer.

Asset Allocation

The allocation of assets within investment categories authorized under this policy shall be approved by the library.

Competitive Bidding

Authorized Chief Investment Officer shall obtain competitive bids from at least three (3) broker/dealers prior to executing the purchase or sale of any authorized investments.

Certificates of deposit shall be purchased by authorized Chief Investment Officer on the basis of a qualified financial institution's ability to pay a required rate of interest to the library set on a daily basis. Such rate is generally determined on the basis of treasury or other appropriate market rates for a comparable term.

Limitation of Liability

The standard of prudence to be used by authorized Chief Investment Officer shall be the "prudent person" standard as stated herein, and shall be applied in the context of managing an overall portfolio. Authorized Chief Investment Officer acting in accordance with written procedures and this policy and exercising due diligence shall be relieved of personal liability for an individual security's credit risk or market price changes, provided deviations from expectations are reported in a timely fashion and necessary action is taken to control adverse developments.

Reporting

Financial reports shall be presented monthly to the library by the Library Director as prepared by the investment advisor and reviewed by the designated accountant.

The monthly report shall contain the following:

- Performance as compared to established benchmarks;
- Asset allocation;
- Any circumstances resulting in a deviation from the standards established in this policy;
- Impact of any material change in investment policy adopted during the quarter;
- The average days to maturity; and
- A listing of all investments in the portfolio marked to market value, including but not limited to information regarding securities in the portfolio by class or type, by value, income earned and market value as of the report date.

The library's investment advisor(s) shall develop performance reports in compliance with established industry reporting standards within six (6) months following the adoption of this Investment Policy. Such reporting standards may include those sanctioned by the Association of Investment Management Research ("AIMR") in accordance with Generally Accepted Accounting Principles("GAAP").

Delegation of Authority:

The Board of Library Trustees shall employ one or more investment advisor(s) possessing superior capabilities in the management of assets of governmental bodies. The Board of Library Trustees shall require the investment advisor(s) selected and working on behalf of the library to meet the following conditions:

- To take actions in the exercise of its discretion which in its best professional judgment are in the best interests of the library and in accordance with this policy. Such actions include but are not limited to (a) the allocation of library funds among alternative types of investments; (b) specific investment opportunities regarding the acquisition, retention or disposition of investments; and (c) the recommendation of the addition, deletion or modification of authorized investments.
- To execute all investment transactions on behalf of the library at the best net price, utilizing such approved brokers and dealers as it deems appropriate to obtain the best execution capabilities and/or valuable information with respect to the economy, at the lowest cost to the library.
- Such additional responsibilities as are set forth in such investment advisor's written contract with the library.

The library's investment advisor(s) shall be responsible for establishing the internal controls in written procedures for the operation of the library's investment program as set forth in this policy.

Until the Board of Library Trustees appoints one or more investment advisor(s), administrative and management responsibility for the investment program set forth in this policy is delegated to the Finance Director of the Village of Villa Park who shall establish all internal controls and written procedures required herein.

Execution of the policies shall be the responsibility of the library's Treasurer who shall be the library's Chief Investment Officer who, acting under the authority of the Board of Library Trustees, shall make investment decisions in conjunction with the Finance Director.

The provisions of Sections 3 and 3.2 of the Illinois Public Officers Prohibited Activities Act (50 ILCS 105/3 and 3.2) are adopted as provisions of this policy by reference and are applicable to each member of the Board of Library Trustees, the Library's Director, Treasurer/Chief Investment Officer and Finance Director.

Reservation of Rights

The library reserves the right to amend this policy at any time upon the advice and consent of its Board of Library Trustees.

Availability

This policy shall be available to the public at the library's main Administration Office.

Revised 03/2014
10/26/2022