STATEMENT
OF
INVESTMENT POLICY

Amended: February 2, 2023

INVESTMENT DEPARTMENT
MISSION STATEMENT

Under the guidance and direction of the Board of Trustees, and governed by the Prudent Person Rule, it is the mission of the Investment Department to optimize the total return of the IMRF investment portfolio through a policy of diversified investment using parameters of prudent risk management.

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IMRF™

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STATEMENT OF INVESTMENT POLICY

I. Introduction and Purpose

A. About IMRF

The Illinois Municipal Retirement Fund ("IMRF") is a defined benefit plan created in 1939 by the Illinois General Assembly for the exclusive purpose of providing retirement, death and disability benefits to employees of local units of government and school districts in Illinois. IMRF serves approximately 3,050 employers and approximately 457,835 members and annuitants. IMRF is separate and apart from the Illinois state government. Benefits are funded by employer and member contributions and investment returns.

IMRF is governed by a Board of eight elected trustees. Four are elected by employers, three are elected by participating members and one is elected by annuitants (individuals receiving retirement benefits). The Board appoints an Executive Director who is responsible for all administrative functions and supervision of Staff employees.

Mission Statement

To efficiently and impartially develop, implement, and administer programs that provide income protection to members and their beneficiaries on behalf of participating employers in a prudent manner.

Vision

To provide the highest quality retirement services to our members, their beneficiaries, and employers.

B. Legal Authority

IMRF was created by Article 7 of Chapter 40, Act 5 of the Illinois Pension Code in order to provide a sound and efficient system for the payment of annuities and other benefits to officers and employees, and to their beneficiaries, of municipalities of the State of Illinois.

Article 1 Chapter 40 Section 109 of the Illinois Compiled Statutes provides the key legal criteria regarding investment policy as follows:

"**Duties of Fiduciaries"**. A fiduciary with respect to a retirement system or pension fund established under this Code shall discharge his or her duties with respect to the retirement system or pension fund solely in the interest of the participants and beneficiaries and:

a) For the exclusive purpose of:
   (1) Providing benefits to participants and their beneficiaries; and
   (2) Defraying reasonable expenses of administering the retirement system or pension fund;

b) With the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character with like aims;
c) By diversifying the investments of the retirement system or pension fund so as to minimize the risk of large losses, unless under the circumstances it is clearly prudent not to do so; and
d) In accordance with the provisions of the Article of the Pension Code governing the retirement system or pension fund.

C. Investment Philosophy

IMRF's investment philosophy has been developed with careful consideration of its primary purpose, fiduciary obligations, statutory requirements, liquidity needs, income sources, benefit obligations, and other general business conditions. The investment philosophy embraces the following:

- Asset allocation is the most significant factor attributable to the long-term total return of the Fund. Diversification is the primary risk control element. Commitments to asset allocation targets and ranges will be maintained through rebalancing as appropriate. The asset allocation will be reexamined at least annually to ensure its appropriateness to capital market conditions and liability considerations.

- The Fund's liabilities are long-term and therefore the investment horizon will be at least 10 years. Strategic decisions will prevail in determining asset allocation rather than tactical or short-term market timing decisions.

- Investment structure has a vital role in the achievement of portfolio returns and mitigation of risk consistent with target asset allocation and includes the following primary components:

    - Cost effectiveness of asset class strategies
    - Sufficient total Fund liquidity
    - Amount and type of internal and external management
    - Relative proportion of active management, factor strategies, and passive investments
        - Internal and external active management and factor strategies may be utilized to add value beyond broad market benchmarks.
        - Internal and external passive investments, those that closely replicate a market capitalization weighted index, may be utilized to complement actively managed portfolios and factor investing strategies as an efficient way to provide benchmark return, adjust risk within the

overall fund and provide a liquid and low-cost asset pool to facilitate timely fund rebalancing, especially in highly efficient markets.

- Internally managed portfolios can be utilized to provide greater flexibility and capture optimal positioning and market opportunity.

- Due diligence and monitoring of investment managers is critical to safeguarding the Fund's assets.

D. Roles and Responsibilities

The Board of Trustees and internal Investment Staff have specific responsibilities in the management and oversight of IMRF's investment activities. The Board of Trustees may allocate duties among themselves and designate others as fiduciaries to carry out specific fiduciary activities. External advisors, investment managers and contractors may be retained, as fiduciaries, to execute certain investment or related activities.

All persons who act as agents of the Board shall adhere to the highest standards of professional integrity and honesty and are prohibited by law from profiting directly or indirectly from the investments of the Fund. However, this shall not preclude an agent of the Board from acting as principal participant or servicer in transactions with the Fund when that interest is fully disclosed and approved by the Board.

IMRF Investment Staff is subject to ethics rules, which include restrictions on personal trades and conflicts of interest. IMRF Investment Staff is required to adhere to and abide by the Chartered Financial Analyst (CFA) Institute Code of Ethics and Standards of Professional Conduct which can be found here: https://www.cfainstitute.org/-/media/documents/code/code-ethics-standards/code-of-ethics-standards-professional-conduct.ashx.

Through a quarterly attestation process, IMRF Investment Staff acknowledges that the below activities are strictly prohibited:

1. Insider trading, which is an illegal activity in which a person makes trades based on proprietary and confidential information they received about a security that investors generally do not know (i.e. acting on material/non-public information).

2. Front running, which is an illegal activity in which a person, knowing an institution or firm is about to make a market-moving trade in a security, takes or sells a position in that security "in-front" of the trade in order to make a personal profit.

The following section outlines the roles and responsibilities for the Board of Trustees, Investment Staff, Investment Managers and Investment and Performance Consultants involved with executing this Policy.

1. **Board of Trustees**

   The members of the Board are responsible, as trustees and fiduciaries, for the proper oversight of the IMRF assets. Trustees shall carry out their functions solely in the interest of the members and benefit recipients and for the exclusive purpose of providing benefits and defraying reasonable expenses incurred in performing such duties, as required by law.

   Trustees shall act in accordance with the provisions of State Statute and with care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of like character with like aims by diversifying the investment of the Fund so as to minimize the risk of large losses, unless under the circumstances it is clearly prudent not to do so.

   The Board of Trustees is responsible for the following investment related activities:

   - Set the policies, objectives, and guidelines for investment of the Fund's assets and oversee compliance with investment policy and the laws of Illinois.

   - Study thoroughly each issue affecting the Fund's investments to make educated and prudent decisions.

   - Select qualified professionals to assist in implementing investment policies and evaluate their services.

   - Consider Staff recommendations for selecting or terminating investment managers.

   - Consider Staff recommendations for funding or terminating internally managed portfolios.

   - Consider investment actions recommended by Staff.

   - Evaluate total Fund performance inclusive of all external investment manager mandates and internally managed portfolios.

2. **Investment Staff**

   The Chief Investment Officer (CIO) is responsible for the coordination of all investment activities and matters involving the Fund's assets.

The CIO is responsible for continuous review and analysis of the Fund's assets and to recommend adjustments which are appropriate to take optimum advantage of new conditions and strategies as they arise in the marketplace.

The CIO is responsible for the oversight of the Fund's internally managed portfolios.

The CIO is responsible for overseeing all investment activities required to implement the IMRF Statement of Investment Policy. The CIO will advise the Board of Trustees and Investment Committee on any investment related matters.

Staff reviews and analyzes the philosophies, policies and strategies employed by the Fund's investment managers.

Staff, with guidance and direction from the CIO, is responsible for the following:

- For Board approved internally managed portfolios, Staff will construct and manage investment portfolios that are consistent with the mandate investment guidelines. Staff will be responsible for selecting, buying, monitoring, and selling securities.

- On an annual basis, review and recommend to the Investment Committee of the Board the Investment Committee Charter and the Statement of Investment Policy.

- Ensure compliance with investment policies and procedures established by the Board of Trustees.

- Manage cash flow by allocating to and/or redeeming from existing Fund investments inclusive of externally managed mandates and internally managed portfolios to pay benefits and expenses and/or fund Board approved investments.

- Recommend investment actions to the Investment Committee of the Board of Trustees and/or to the Board of Trustees.

- Staff is responsible for managing each asset class, as described by the IMRF Investment Policy, on an on-going basis, including monitoring the investment managers and reporting to the Board of Trustees.

- Conduct all necessary due diligence relating to the selection of investment managers and consultants. Sustainability factors will be considered when evaluating investment recommendations.

- Negotiate contracts and related documents with investment managers, consultants, service providers and master trustee in conjunction with general counsel and external counsel where appropriate.

- Implement investment manager guideline changes as deemed appropriate. All guideline changes must be approved by the CIO.

- Monitor and report to the Board of Trustees annually on programs related to securities lending, proxy voting, minority manager and minority broker goals.

- Respond to inquiries from the state legislature, the membership, the press, other governmental representatives, and the public concerning the investments of the Fund.

- Coordinate communications between master trustee, investment managers, brokers, consultants, and other service providers.

3. Investment Managers

The Board of Trustees seeks to employ investment managers who possess superior capabilities in the management of assets.

External investment managers, as fiduciaries selected by the Board of Trustees and monitored by Staff, have the authority to manage, acquire, or dispose of any assets of the Fund within their mandate.

External investment managers will acknowledge in writing that they are a fiduciary with respect to the Fund and is at least one of the following: (1) registered as an investment adviser under the federal Investment Advisers Act of 1940; (2) a bank, as defined in the Investment Advisers Act of 1940.

The Board of Trustees requires external investment managers to meet the conditions as stated in their respective investment management agreements with IMRF.

- All investment managers will construct and manage investment portfolios that are consistent with IMRF's investment guidelines. The investment manager will select, buy and sell specific securities or investments within the parameters specified by their investment management agreement with IMRF.

- Public market external investment managers will report to the Fund monthly. Public markets investment managers will generally report on:

    - The composition and relative performance of the investments in their designated portfolios
    - The economic and investment outlook for the near and long term
    - Significant changes in the portfolio under their management
    - The reasons for any significant differences between the performance of their portfolios and the appropriate market indices or other performance benchmarks established by the Fund and the investment managers
    - Legal and regulatory issues
    - Organizational and personnel developments
    - Assets under management

- The public market investment managers will report to the Fund monthly on the use of minority and woman owned business enterprise broker/dealers and broker/dealers owned by a person with a disability.

- Private market investment managers will provide periodic financial statements and other reports as specified in their investment agreements with IMRF.

- All investment managers will adhere to any additional responsibilities as detailed in each investment manager's agreement with the Fund.

Note: Limited Partnership Investments, typically in private market asset classes, are not considered investment managers as defined by Illinois Pension Code.

4. Investment and Performance Consultants

Investment Consultant

Investment Consultants are persons or entities selected by the Board of Trustees, as fiduciaries and advisers, to make recommendations in developing an investment strategy, assist with finding appropriate investment managers, and monitor the Fund's performance.

The Investment Consultant will:

- In conjunction with the CIO, provide reports to the Board of Trustees on emerging trends and issues of concern to public pension funds generally and to the Fund in particular.

- Provide education to the Board of Trustees and Staff, which includes but is not limited to analyzing and summarizing relevant publications, discussions, meetings, and research on current investment related topics.

- Serve as a resource to Staff by analyzing and making recommendations with respect to the IMRF Statement of Investment Policy, the investment plan and each investment manager's strategy.

- In conjunction with the CIO, conduct an annual asset allocation review with the Board of Trustees considering the appropriate investment horizon for the Fund given its actuarial characteristics.

- Assist Staff and the Board of Trustees in setting and implementing the asset allocation.

- Evaluate investment manager candidates using non-discriminatory practices[1] when engaged by IMRF for a RFP search.

Performance Evaluation Consultant
The Performance Evaluation Consultant shall provide monthly and quarterly investment performance evaluation and analysis to the Board of Trustees. Total Fund performance and each investment manager employed by the Fund shall be measured against appropriate indices and benchmarks. The quarterly investment performance report shall include IMRF gross and net returns for the total Fund, asset classes, external investment managers against appropriate peer universes and benchmarks, and performance of internally managed portfolios against strategy appropriate benchmarks.

II. Investment Objectives and Goals

A. Investment Objectives

All investment actions undertaken will be for the sole benefit of the Fund's members and benefit recipients, consistent with the Fund's Strategic Plan. The Board has a responsibility to make investment decisions with the objective of obtaining superior total long-term rates of return utilizing internal and external investment management capabilities subject to parameters of prudent risk management and reasonable control of costs. To assure an adequate accumulation of assets in the Fund, the investment objectives are to:

1. Over the long term, achieve for the total Fund a rate of return in excess of the assumed actuarial investment rate of return of 7.25%.

[1] *When conducting a search for a new investment manager, the Board of Trustees requires that all minority owned, woman owned businesses and businesses owned by a person with a disability enterprise investment management firms evaluated during the search process be specifically identified in the search report presented to them. The most qualified minority candidate(s) will be invited to present to the Investment Committee of the Board or the Board of Trustees. Any reasons for eliminating a minority candidate(s) from further consideration must also be provided in the report.*

2. Achieve for the total Fund a rate of return in excess of inflation.

3. Achieve for the total Fund a rate of return in excess of the Total Fund Benchmark. The Total Fund Benchmark, as defined in Section IV, is a blend of the asset class benchmark returns weighted by the target allocation for each asset class.

IMRF's Diverse Investment Manager Policy

The Illinois Municipal Retirement Fund is committed to diversity in the hiring of minority owned and emerging investment managers, as defined by the Illinois Pension Code.

Minority Investment Manager Definition

A minority investment manager is defined as an investment manager that manages an investment portfolio and meets the definition of "minority owned business", "woman owned business", or "business owned by a person with a disability", as defined in the Business Enterprise for Minorities, Women, and Persons with Disabilities Act. Minority Investment Management firms must be 51% or more owned by individuals that are minorities, women or persons with a disability and are citizens or lawful permanent residents of the United States.

Emerging Investment Manager Definition

An emerging investment manager is defined as an investment advisor that manages an investment portfolio of at least $10,000,000 but less than $10,000,000,000 and is a "minority owned business", "woman owned business", or "business owned by a person with a disability", as defined in the Business Enterprise for Minorities, Women, and Persons with Disabilities Act. Emerging Investment Management firms must be 51% or more owned by individuals that are minorities, women or persons with a disability and are citizens or lawful permanent residents of the United States.

For complete definitions of Minority and Emerging Investment Manager please go to the following website:
(30 ILCS 575/) Business Enterprise for Minorities, Women, and Persons with Disabilities Act.

The IMRF Board of Trustees adopts the following aspirational goals and minority and emerging investment manager goals based on percentage of total Fund market value, percentage of asset class, and percentage of investment management fees paid.

B. Aspirational Goals

(In Compliance with Section 1-109.1 (10) of the Illinois Pension Code)

The Illinois Municipal Retirement Fund Board of Trustees adopts two aspirational goals: (i) to utilize emerging investment managers for at least 20% of the total Fund's assets under management and (ii) to utilize firms owned by minorities, women and persons with disabilities for at least 20% of the total Fund's assets under management.

Policy to Achieve Aspirational Goals

The Illinois Municipal Retirement Fund Board of Trustees adopts a policy to ensure progress towards achieving the aspirational goals. The policy directs the IMRF Investment Staff:

- to build relationships with the minority and emerging investment manager community by attending and/or speaking at conferences and events
- to launch targeted RFP's that specifically focus on emerging and/or minority owned firms
- to utilize manager of managers and fund of funds programs to hire underlying minority and emerging investment managers
- to graduate underlying minority and emerging investment managers for direct mandates

The Illinois Municipal Retirement Fund Board of Trustees will evaluate the Executive Director on the efforts to achieve the aspirational goals. Job descriptions for key Staff reflect IMRF's commitment to diversity and aspirational goals.

C. Minority and Emerging Investment Manager Goals

(In Compliance with Section 1-109.1 (4) & (9) of the Illinois Pension Code)

The Illinois Municipal Retirement Fund is committed to providing opportunities for minority and emerging investment managers.

The Illinois Municipal Retirement Fund Board of Trustees adopts separate goals for: (i) minority and emerging investment managers that are minority owned businesses; (ii) minority and emerging investment managers that are woman owned businesses; and (iii) minority and emerging investment managers that are businesses owned by a person with a disability. Additionally, the IMRF Board of Trustees adopts fee goals for minority investment managers consistent with aspirational goal.

Goals for Minority and Emerging Investment Managers by Investment Manager Classification		
Minority Manager (any AUM)		Emerging Manager (AUM $10 million to $10 billion)
Investment Manager Classification	Minimum Goal as a Percentage of Total Fund Market Value	Minimum Goal as a Percentage of Total Fund Market Value
Minority Owned Businesses	13%	13%
Woman Owned Businesses	6%	6%
Businesses Owned by a Person with a Disability	1%	1%
Total Aspirational Goal	**20%**	**20%**
Minimum Goal as a Percentage of Total Fees	**20%**	

The Illinois Municipal Retirement Fund Board of Trustees adopts goals for minority-owned and emerging investment managers by asset class.

Goals for Investment Managers by Asset Class		
Asset Class	Minority Minimum Goal as a Percentage of Asset Class	Emerging Minimum Goal as a Percentage of Asset Class
U.S. Equity	10%	5%
International Equity	20%	15%
Fixed Income	40%	25%
Private Real Assets	10%	10%
Alternative Investments	25%	10%

*Based on committed amounts

D. Investments in Illinois Businesses

The Board recognizes that investments made in businesses operating in Illinois and in real assets and other assets in the state may contribute to an improved economic climate in the state. Therefore, where investment characteristics such as competitive rate of return in relation to the risks involved, minimum quality standards, liquidity considerations, and other investment objectives of the Board are equivalent, the Board favors investments which will have a positive impact on the economy of Illinois. However, nothing in this paragraph shall be construed to favor the foregoing of investment return in order to provide a subsidy to a particular group to the detriment of the Fund members, their beneficiaries, or their public employers.

E. Minority Broker/Dealer Utilization

The firms that are to act as a securities broker-dealer with respect to the purchase and sale of assets for the Fund shall be selected by the investment manager in its sole discretion. The investment manager or any entity controlled by or controlling it, or affiliated with it, shall not act as a securities broker-dealer with respect to purchases and sales of assets allocated to the investment manager unless the Board specifically approves such action. This excludes Transition Manager assignments.

In the selection of broker-dealers with whom to place orders for the purchase or sale of securities for the Fund, the primary objective of the investment manager shall be to obtain the most favorable results for the Fund. The investment manager's selection of broker-dealers may take into account the following factors:

1. satisfy IMRF's goals for minority broker-dealers;
2. price and/or commission;
3. the broker-dealer's facilities, reliability and financial responsibility;
4. the ability of the broker-dealer to effect securities transactions, particularly with respect to such aspects as timing, order size, execution of orders and the ability to complete a transaction through clearance, settlement and delivery;
5. the research provided by such broker-dealer to the investment manager which is expected to enhance general portfolio management capabilities, notwithstanding the fact that the Fund may not be the direct or exclusive beneficiary of such services and;
6. with the exception of investment-related research reports, soft dollar commissions may not be generated in order to satisfy, directly and/or indirectly, payment for any other services such as vendor fees, administrative expenses, and/or other externally sourced amenities.

The investment manager's selection of such broker-dealers shall be in accordance with Article I of the Illinois Pension Code (40 ILCS 5/1-101 et seq.).

Minority Broker/Dealer Goals

The Illinois Municipal Retirement Fund is committed to providing opportunities for broker/dealers owned by minorities, women, and persons with a disability. The Illinois Municipal Retirement Fund Board of Trustees adopts a policy which sets forth goals for increasing the utilization of minority broker/dealers.

The minimum expectations for the goals of minority broker/dealers are based on commission dollars for Equities and par value for Fixed Income. Investment managers of separately managed investment portfolios and commingled passive equity index funds, in the following asset classes, must meet the minimum goals:

Asset Class	2023 Minimum Goal
U.S. Equities	25%
U.S. Large-Cap Equities	30%
International Equities	20%
Global Listed Infrastructure	20%
Fixed Income (Core/Core Plus)	25%
High-Yield Bonds	5%
International Small-Cap Equities	5%
Emerging Market Equities	5%
Commingled Passive U.S. Equity Index Funds	10%
Commingled Passive International Equity Index Funds	10%

Note: This broker/dealer goal will be reviewed annually. IMRF may allow current investment managers a limited transition period when minority broker/dealer goals are increased.

Investment managers are prohibited from using indirect methods such as step-outs to achieve these goals.

Investment managers of actively managed pooled/commingled investment portfolios are directed to use their best efforts to execute trades with minority broker/dealers. These efforts will be evaluated during semi-annual portfolio review meetings.

All external investment managers executing brokerage on behalf of the Illinois Municipal Retirement Fund are directed to meet these minimum goals in their specific portfolios and shall report monthly on their goals of minority broker/dealers. Any external investment manager failing to meet the minimum goal during the reporting month must provide a written explanation disclosing the reasons for not meeting the goal.

Internally managed portfolios are expected to meet or exceed the Fund's current minority brokerage goals.

Transition managers are expected to meet or exceed current minority brokerage goals.

Staff will report to the Board of Trustees annually on the goals of minority broker/dealers. External investment managers not meeting the minority broker/dealer goals will be identified in the report. An external investment manager's ability to meet a minority brokerage goal is an integral part of the manager monitoring process. Consequences for not meeting IMRF's minority brokerage goals are situation specific and range from increased monitoring, placement on watch list, asset reduction, termination, and exclusion from receiving additional allocations/mandates.

F. Policy Regarding Minority Owned Business Goals Disclosures (In Compliance with Section 1-113.21 of the Illinois Pension Code) (See Appendix G for Disclosure Form)

The Illinois Municipal Retirement Fund requires the following disclosure from the investment advisor, consultant, or private market fund:

1. The number of its investment and senior staff and the percentage of its investment and senior staff who are (i) a minority person (ii) woman, and (iii) a person with a disability;

2. The number of contracts, oral or written, for investment services, consulting services and professional and artistic services that the investment advisor, consultant, or private market fund has with (i) a minority owned business, (ii) woman owned business, or (iii) a business owned by a person with a disability; and

3. The number of contracts, oral or written, for investment services, consulting services, and professional and artistic services that the investment advisor, consultant, or private market fund has with a business other than (i) a minority owned business, (ii) woman owned business or (iii) a business owned by a person with a disability, if more than 50% of services performed pursuant to the contract are performed by (i) a minority person, (ii) woman, and (iii) a person with a disability.

G. Policy Regarding Consultants' Searches and Inclusion, Recommendation, Selection and Investments made with Minority, Woman and Disabled Owned Firms
(In Compliance with Section 1-113.22 of the Illinois Pension Code)
(See Appendix H for Disclosure Form)

The Illinois Municipal Retirement Fund requires the following disclosures from its consultant(s) annually. Current consultant(s) are required to provide the disclosures by January 1st. Furthermore, the IMRF Board of Trustees will not hire a consultant(s) without the following disclosures.

1. Firm wide the total number of searches for investment services made by the consultant in the prior calendar year.

2. Firm wide the total number of searches for investment services made by the consultant in the prior calendar year that included a minority owned business, woman owned business, or a business owned by a person with a disability.

3. The total number of searches for investment services made by the consultant in the prior calendar year in which the consultant recommended for selection a minority owned business, woman owned business, or a business owned by a person with a disability.

4. The total number of searches for investment services made by the consultant in the prior calendar year that resulted in the selection of a minority owned business, woman owned business or a business owned by a person with a disability.

5. The total dollar amount of investments made in the previous calendar year with a minority owned business, woman owned business or a business owned by a person with a disability that was selected after a search for investment services performed by the consultant.

H. Policy Regarding Consultants' Disclosures of Compensation and Economic Opportunity received from Investment Advisors Retained by the Fund and Recommended by the Consultant
(In Compliance with Section 1-113.23 of the Illinois Pension Code)
(See Appendix H for Disclosure Form)

The Illinois Municipal Retirement Fund requires the following disclosures from its consultant(s) annually. For consultant led RFP searches, the IMRF Board of Trustees will not hire an investment advisor that is recommended for selection by the consultant without the following disclosures. Current consultant(s) are required to provide the disclosures by January 1st. Furthermore, the IMRF Board of Trustees will not hire a consultant(s) without the following disclosures.

1. Consultant(s) are required to disclose all compensation and economic opportunity received in the last 24 months from investment advisors retained by the IMRF Board of Trustees.

2. Prior to the IMRF Board of Trustees selecting an investment advisor, the consultant(s) are required to disclose any compensation or economic opportunity received in the last 24 months from an investment advisor that is recommended for selection by the consultant.

I. Policy Regarding the Illinois High Risk Home Loan Act

1. It is the policy of IMRF that, unless otherwise inconsistent with any fiduciary duties that may apply, no Illinois finance entity may receive deposits or investments from IMRF unless it certifies that it complies with the requirements of the Illinois High Risk Home Loan Act (815 ILCS 137/1 et seq.) and the rules adopted pursuant to that Act that are applicable to that finance entity. This certification is required before an Illinois finance entity receives a deposit or any assets to invest from IMRF and annually thereafter. For Illinois finance entities with whom IMRF is investing or depositing assets on the effective date of this policy, the initial certification required shall be completed within 6 months after the effective date.

2. If an Illinois finance entity fails to submit an annual certification, then IMRF shall notify that Illinois finance entity. The Illinois finance entity shall, within 30 days after the date of notification, either (i) notify IMRF of its intention to certify and complete certification or (ii) notify IMRF of its intention not to complete certification. If an Illinois finance entity fails to provide certification, then IMRF shall, within 90 days, divest, or attempt in good faith to divest, its assets with that Illinois finance entity. IMRF shall immediately notify the Public Pension Division of the Department of Financial and Professional Regulation of the Illinois finance entity's failure to provide certification.

3. IMRF shall annually submit copies of the certifications to the Public Pension Division of the Department of Financial and Professional Regulation.

4. For purposes of this policy, "Illinois finance entity" means any entity chartered under the Illinois Banking Act, the Savings Bank Act, the Illinois Credit Union Act, or the Illinois Savings and Loan Act of 1985 and any person or entity licensed under the Residential Mortgage License Act of 1987, the Consumer Installment Loan Act, or the Sales Finance Agency Act.

5. The required certification (see Appendix F, attached hereto) must be submitted.

III. Asset Allocation

Asset allocation is generally recognized to have the largest impact on a pension fund's investment performance and risk. Allocating across multiple asset classes with different characteristics helps mitigate the pension fund's risk from being concentrated in any single asset type. A well- diversified asset allocation approach, including consideration of macroeconomic and fundamental risk factors, positions the portfolio to produce more consistent results over time and is expected to generate superior long-term returns.

The Fund's liabilities are long term in nature and the investment strategy will therefore be long term oriented with due consideration of the use of short-term investments to meet cash flow requirements.

Staff and the Investment Consultant(s) shall conduct an Asset Liability Study every three to five years and present the results to the Board. The study will consider the asset class mix, future benefit payments, liabilities, required funding, the appropriateness of the actuarial interest rate assumption, and the prospective funded status of liabilities. Through quantitative asset/liability modeling and qualitative evaluation, an appropriate strategic asset allocation mix will be selected.

Staff and the Investment Consultant will prepare and present an asset allocation review to the Board annually. The asset allocation review will include capital market expectations (10-year horizon), risk/return expectations for major asset classes, appropriate benchmarks, asset class and style targets, and diversification considerations. In addition to achieving diversification by asset class, careful attention shall be paid to diversification within each asset class and sub-allocation and manager concentration at a total Fund level.

The table below shows the long-term strategic target asset allocation, including a ± 4% range for each asset class with the exception of cash equivalents. The long-term strategic asset allocation will be implemented over the next three years, culminating in the targets listed in the table below.

Asset Class	Asset Allocation Targets	Asset Class Ranges	Policy Benchmark Index
U.S. Equity	32.5%	28.5% – 36.5%	Custom U.S. Equity Benchmark
International Equity	18.0%	14% - 22%	MSCI AC World Index ex USA (Net)
Fixed Income	24.0%	20.0% - 28.0%	Custom Fixed Income Benchmark
Private Real Assets	10.5%	6.5% - 14.5%	Custom Private Real Assets Benchmark
Alternative Investments	14.0%	10.0% - 18.0%	Custom Alternative Investments Benchmark
Cash Equivalents	1.0%	0% - 2%	3 Month Treasury Bills

The table below shows the 2023 asset allocation implementation plan effective January 1, 2023, including a ± 4% range for each asset class with the exception of cash equivalents.

Asset Class	Asset Allocation Targets	Asset Class Ranges	Policy Benchmark Index
U.S. Equity	34.5%	30.5% – 38.5%	Custom U.S. Equity Benchmark
International Equity	18.0%	14% - 22%	MSCI AC World Index ex USA (Net)
Fixed Income	24.5%	20.5% - 28.5%	Custom Fixed Income Benchmark
Private Real Assets	10.5%	6.5% - 14.5%	Custom Private Real Assets Benchmark
Alternative Investments	11.5%	7.5% - 15.5%	Custom Alternative Investments Benchmark
Cash Equivalents	1.0%	0% - 2%	3 Month Treasury Bills

Actual allocations that exceed their target by ± 4% will be noted at the next scheduled Board meeting. If deemed necessary by the Chief Investment Officer and Consultant, recommendations for rebalancing strategies will be presented to the Board for their approval.

IV. Benchmarks & Asset Class Objectives

A. Benchmarks

The Board seeks to achieve for the total Fund a rate of return in excess of the Total Fund Benchmark. Each asset class and sub-asset class is measured against a benchmark that describes the opportunity set, return and risk characteristics associated with each asset class. For certain private asset classes, the benchmark serves as a proxy for expected return. The Total Fund Benchmark is a blend of the asset class benchmark returns weighted by the target allocation for each asset class. The 2023 Total Fund Benchmark effective January 1, 2023 is equal to the sum of:

	1/1/2023 Benchmark		
Asset Class	Benchmark Weighting	Policy Benchmark Index	Custom Policy Benchmark Components
U.S. Equity	35.5%	Custom U.S. Equity Benchmark	93% Russell 3000 Index 7% FSTE Global Core Infrastructure 50/50 Index (Net)
International Equity	18.0%	MSCI All Country World Index ex USA (net)	
Fixed Income	25.5%	Custom Fixed Income Benchmark	78% Bloomberg U.S. Aggregate Bond Index 8% ICE BofAML U.S. High Yield Cash Pay Index 14% Custom Global Bank Loan Index
Private Real Assets	10.5%	Custom Private Real Assets Benchmark	95% NCREIF ODCE Index 5% CPI +4%
Alternative Investments	9.5%	Custom Alternative Investments Index	95% MSCI World Index (Net) (1 QtrLag) + 3% 5% S&P/LSTA U.S. Leverage Loan 100 Index +2%
Cash	1.0%	3-month T-Bills	

Beginning on January 1, 2024, the Total Fund Benchmark will shift to the sum of:

	1/1/2024 Benchmark		
Asset Class	Benchmark Weighting	Policy Benchmark Index	Custom Policy Benchmark Components
U.S. Equity	34.5%	Custom U.S. Equity Benchmark	93% Russell 3000 Index
			7% FSTE Global Core Infrastructure 50/50 Index (Net)
International Equity	18.0%	MSCI All Country World Index ex USA (net)	
Fixed Income	24.5%	Custom Fixed Income Benchmark	82% Bloomberg U.S. Aggregate Bond Index
			8% ICE BofAML U.S. High Yield Cash Pay Index
			10% Custom Global Bank Loan Index
Private Real Assets	10.5%	Custom Private Real Assets Benchmark	95% NCREIF ODCE Index
			5% CPI +4%
Alternative Investments	11.5%	Custom Alternative Investments Index	87% MSCI World Index (Net) (1 QtrLag) + 3%
			13% S&P/LSTA U.S. Leverage Loan 100 Index +2%
Cash	1.0%	3-month T-Bills	

B. IMRF invests in U.S. equity securities through external investment managers and internally managed portfolios in order to earn an equity risk premium and enhance the long-term returns of the Fund. The objective of the U.S. equity securities portfolio is to achieve a total return that exceeds the total return of the Custom U.S. Equity Benchmark net of fees.

C. IMRF invests in international equities to earn an equity risk premium and to diversify the equity exposure within the Fund. The objective of the international equity portfolio is to achieve a total return that exceeds the total return of the Morgan Stanley Capital International All Country World Index ex-US net of dividends (MSCI ACWI ex-US) net of fees.

D. IMRF invests in fixed income to provide stable income and to diversify the equity market risk in the investment portfolio. The objective of the fixed income portfolio is to achieve a total return that exceeds the total return of the Custom Fixed Income Benchmark net of fees.

E. IMRF invests in private real assets to provide diversification, inflation protection, income generation, and long-term capital appreciation in the investment portfolio. The objective of the private real assets portfolio is to achieve a total return that exceeds the total return of the Custom Private Real Assets Benchmark net of fees.

F. IMRF invests in alternative investments through Staff led investments and external manager of managers programs in order to diversify the

Fund's assets and to enhance the investment portfolio returns. These investments can be highly illiquid and IMRF seeks to be compensated for such illiquidity by earning returns substantially greater than those available from publicly traded markets. The objective of the alternative investment portfolio is to achieve a total return that exceeds the total return of the Custom Alternative Investments Benchmark net of fees. Alternative investments include private equity and private credit assets.

– Private Equity: IMRF invests in private equity to diversify the Fund's assets and enhance the investment portfolio returns through long-term appreciation.

– Private Credit: IMRF invests in private credit to diversify the Fund's assets and enhance the investment portfolio returns through alternative income yield and long-term appreciation.

G. Cash is held primarily to pay benefits and administrative expenses and fund Board approved investments. The objective of the internally managed cash portfolio is to achieve a total return in excess of 3-month U.S. Treasury Bills.

V. Investment Guidelines

The Board requires public market investment managers to meet specific contractual guidelines detailed in each investment manager's agreement with the Fund. Internally managed portfolios are subject to strategy specific investment guidelines. The Board of Trustees recognizes the following investment guidelines for each asset class. The guidelines presented here are intended to be summarizations.

Public Markets

A. U.S. Equity

1. Exposure of the total U.S. Equity portfolio to any one sector shall generally not differ by more than 10 percentage points from the sector exposure of the Custom U.S. Equity Benchmark.
2. The amount of cash and cash equivalents held in the U.S. Equity portfolio generally shall not exceed 5 percent of the total portfolio except during periods of cash contributions or withdrawals.

3. IMRF shall generally not hold more than 5 percent of the outstanding shares of any one company.

4. No individual security shall comprise more than 15 percent of a manager's portfolio market value without prior approval from the CIO.

5. Generally, no individual security shall comprise more than 5 percent of the total U.S. Equity portfolio.

6. Equity securities must be listed on the principal U.S. exchanges or traded over the counter. ADRs and GDRs (either listed or traded over the counter) of foreign companies are permissible.

B. International Equity

1. Generally, international equity managers shall only invest in equity securities of companies domiciled outside of the U.S. International equity managers may be allowed to invest a portion of their portfolio in U.S. domiciled companies which have the majority of their operations and/or revenues outside of the U.S.

2. Generally, no individual security shall comprise more than 6 percent of the total international equity portfolio at market value.

3. The amount of cash and cash equivalents shall not exceed 10 percent of the total international equity portfolio except during periods of cash contributions or withdrawals.

4. The exposure to any one country shall not exceed the higher of 25 percent or two times the benchmark weighting at market value.

5. The exposure to any one GIC sector shall not exceed the higher of 25 percent or two times the benchmark weighting at market value.

6. International equity managers may engage in various transactions to manage currency. Forward contracts, futures and options may be used for currency management purposes. Managers are not permitted to utilize over-the-counter derivatives for hedging and/or speculative purposes unless otherwise specified within individual manager guidelines.

C. Fixed Income

1. Bonds, notes or other obligations of indebtedness issued or guaranteed by the U.S. government, its agencies or instrumentalities may be held without restriction.

2. The average credit quality of the total fixed income portfolio must be investment grade.

3. An individual manager's portfolio shall generally have an effective duration between 80-120 percent of the index for mandates benchmarked against the Custom Fixed Income Benchmark or ICE BofAML High Yield Cash Pay indices.

4. Debt obligations of any single U.S. corporation shall generally be limited to a maximum of 5 percent of the total fixed income portfolio at market value.

5. Generally, no more than 30 percent of a manager's assets at market value may be invested in securities rated below investment grade at the time of purchase. Investment managers outside of core and core plus mandates will not be subject to above restriction.

6. Private placements are authorized by the Board on an individual manager basis. Securities issued under rule 144A will not be considered private placements.

7. Bonds or other debt obligations of foreign countries and corporations payable in U.S. dollars and foreign currency are authorized, but in general will not exceed 15 percent of the total fixed income portfolio.

8. The use of swaps, exchange traded financial futures, exchange traded options on financial futures, and over the counter options is subject to individual manager guidelines. Managers are not permitted to utilize these transactions for speculative purposes. Leverage is not allowed except as permitted for rolling mortgage pass-through securities.

9. No assets shall be committed to short sale contracts.

D. Cash and Cash Equivalents

Permissible Investments
Permissible investments include but are not limited to:

- U.S. Treasury Bills and Notes
- Commercial paper rated A-2 or P-2 or better as defined by a recognized rating service
- Repurchase Agreements
- Bankers Acceptances
- Certificates of Deposits
- Short Term Investment Fund (STIF) available through the Master Trustee
- Exchange Traded Funds
- Exchange Traded Futures
- Publicly Listed Equity Securities (Stock Distributions)

<u>Private Markets</u>

E. Real Assets Investments

The Real Assets portfolio may invest in all forms of U.S. and non-U.S. private and public market real assets structures and categories.

Permissible real asset categories include but are not limited to:

- Real Estate
- Agriculture
- Infrastructure
- Timberland

Structures within these categories include but are not limited to:

- Separate Accounts
- Joint ventures
- Open and closed-end commingled funds
- Partnerships
- Limited Liability Companies
- Public/Private REITs and Real Estate Operating Companies (REOCs)
- Secondary Investments
- Foreign Limited Companies
- Unit Trusts
- Co-investments

Real Assets Portfolio Guidelines

1. The maximum commitment to any private real asset manager shall be 35% of the total real asset portfolio market value plus unfunded commitments at the time of the investment recommendation.

2. Exposure to dedicated non-U.S. strategies is limited to 35% of the total real assets portfolio market value plus unfunded commitments at the time of the investment recommendation. The denominator in this calculation is based on the total real assets value plus the total value of unfunded commitments.

3. IMRF's long-term strategic target to core real asset investments is 50% with a minimum of 40%. If the actual allocation falls below 40%, it will be noted at the next scheduled Board meeting. If deemed necessary by the Chief Investment Officer and Consultant, recommendations for rebalancing strategies will be presented to the Investment Committee for their approval.

4. Publicly traded real asset securities should not exceed 20% of the total real assets portfolio market value plus unfunded commitments.

5. Mandate whose sole strategy is to invest in non-equity or debt strategies will not exceed 25% of the total real assets portfolio

market value plus unfunded commitments at the time of the investment recommendation.

Co-Investments

The Board may pre-approve co-investment opportunities at the time of the approval of a real assets investment fund. Staff will generally accept co-investment opportunities at the approval of the Chief Investment Officer. If the General Partner offers a compelling and appropriate co-investment opportunity to IMRF which was not pre-approved, Staff may present this opportunity to the Board for their approval.

F. Alternative Investments

The alternative investment asset class can encompass different and distinct strategies within U.S. and non-U.S. markets. The investment objective is to generate long-term returns in a diversified manner. It generally consists of limited partnerships in which IMRF commits a fixed dollar amount that the General Partner invests over several years. The partnership structure may cover periods of 10 years or more. IMRF understands and recognizes that the alternative asset class will not be structured in a way to provide short term cash flow for the Fund.

Permissible alternative asset categories include but are not limited to:

- Hedge funds
- Private equity
- Private credit

Structures within these categories include but are not limited to:

- Separate accounts
- Commingled funds
- Limited Partnerships
- Limited Liability Companies
- Joint Ventures
- Secondary Investments
- Co-Investments

Alternatives Portfolio Guidelines

1. Exposure to dedicated non-U.S. strategies will be limited to 35% of the total alternative investment portfolio value plus unfunded commitments at the time of due diligence. Alternative investment managers may or may not hedge currency risk. The IMRF alternative portfolio will not implement currency hedges and accepts currency risks consistent with the geographic exposures of the underlying investments.

2. The maximum commitment to any direct alternative manager shall be 35% of the total alternatives' portfolio value plus unfunded commitments at the time of due diligence.

Capital will be deployed to alternatives over an extended period of time and may take several years before reaching the target allocation.

Co-Investments

The Board may pre-approve an internally managed co-investment fund for the purpose of making minority investment positions alongside alternative fund managers with the objective of enhancing investment performance by increasing exposure to existing investments at reduced economics. Co-Investment opportunities will be consummated at the final approval of the CIO.

Stock Distributions

From time to time, IMRF will receive listed and unlisted stock distributions from private market portfolios. Stock distributions will either be transferred to an IMRF account or liquidated as deemed appropriate by the CIO. Our objective for liquidations is to achieve an orderly disposition of the securities in a manner that is accretive to the Fund in an appropriate timeframe based on existing market conditions. The CIO will determine the appropriate execution plan including but not limited to IMRF's master trustee, investment managers, transition managers, distributing agent, or brokers.

VI. Internally Managed Portfolios

Internally managed portfolios are for the exclusive benefit of IMRF and overseen by Investment Staff who specialize in portfolio construction, implementation, and management. The Fund's portfolio construction is inclusive of internal and external management and benefits from the relative merits of both implementation methods. Internally managed portfolios have a singular alignment with the Fund's return objectives and risk tolerance.

The objective of the internally managed portfolios program is to achieve respective asset class returns on an active implementation basis in a cost-efficient manner.

The internally managed portfolios program is comprised of multiple portfolios with distinct public market asset class mandates. Once authorized by the Board, each internally managed portfolio is subject to the specific objective, benchmark, and guidelines established for it. Internally managed portfolios will be based on techniques of disciplined portfolio construction, prudent risk management, and implementation at low transaction cost.

VII. Transition Management

IMRF has established a transition management pool/bench of providers which includes minority and non-minority owned firms. In addition, as part of its custodial arrangement, IMRF has an ongoing contract with its master trustee for transition management services.

When the need for transition management services arises, IMRF seeks bids from the pool of transition management providers. The selection of the actual transition manager to effectuate the transition event is largely dependent on:

- Reasonableness of proposed strategy given market dynamics and the characteristics of both the legacy and target portfolios.
- Total cost analysis
- Specialty considerations
- Liquidity advantage

Transition managers are expected to meet or exceed IMRF's minority brokerage goals.

VIII. Risk Management

The IMRF has established a framework for monitoring total Fund risk and manager allocations. Both the Public and Private Markets teams work in conjunction with the master trustee, consultant, and investment managers to help mitigate firm-level to portfolio-level related risks. Monitoring activities of the public markets portfolio, private markets portfolio, and cash account are summarized below.

Public Markets

A. Staff and Consultant monitor the asset allocation of the Fund on a monthly basis. If deemed necessary by the Chief Investment Officer, recommendations for rebalancing strategies will be presented to the Board for their approval.

B. No external investment management firm shall manage more than 10% of the total Fund for actively managed accounts and 30% for passively managed accounts. Exceptions may be approved by the Chief Investment Officer. Firms exceeding these maximums may be identified as candidates for cash withdrawals to make benefit payments or to fund private markets investments.

C. Staff conducts portfolio reviews with each manager at least twice per year. Staff and Consultant may meet with managers more often as needed.

Managers may be placed on IMRF's Manager Monitoring-Organization list when there is concern regarding firm, team, product, or assets under management.

Total Fund, asset class and individual manager performance is monitored by Staff and Consultant on a monthly basis. Managers may be placed on IMRF's Manager Monitoring – Performance List when there is a concern regarding underperformance.

D. Bloomberg portfolio analytics software is utilized for performance attribution of separate account mandates and reported at Staff meetings. Discussions center on portfolio characteristics, performance and stylistic attribution such as; sector/industry/regional allocation, security selection and currency effects.

E. Investment manager guideline compliance is monitored by Investment Staff each month. Investment managers that violate their investment management guidelines are required to provide a written explanation detailing the cause of the violation and actions being taken to bring the portfolio into compliance. The Chief Investment Officer is notified of all portfolio violations on a monthly basis. Consequences for violating investment management guidelines include: increased portfolio monitoring, placement on watch list, and termination.

F. IMRF's investment managers that are registered investment advisors are required to provide Form ADV as part of the annual certification request. All ADV's are reviewed by Staff.

<u>Private Markets</u>

A. The maximum commitment to any alternatives manager shall be 35% of the total alternative portfolio market value plus unfunded commitments at the time of the investment recommendation.

B. Staff conducts portfolio reviews with each manager at least twice per year. Staff and Consultant may meet with managers more often as needed.

C. Staff reviews all quarterly reports and annual audited financial statements. Managers may be monitored more closely if necessary.

D. IMRF's investment managers that are registered investment advisors are required to provide Form ADV as part of the annual certification request. All ADV's are reviewed by Staff.

<u>Cash Flow Activity</u>

A. Master trustee reports are utilized to monitor all manager transactions on a daily basis. Staff follows up with the master trustee for any unusual activity.

B. The cash flow account for the total Fund is reconciled daily and regularly reported to the CIO. Staff follows up with the master trustee when any unexpected transactions are identified.

Master Trustee

A. Staff reviews the master trustee's Service Organization Control (SOC 1) report twice per year.

IX. Selection of External Investment Managers and Consultants

A. Policy for Selection of External Investment Managers

1. Purpose

This policy defines the process used by the Board to procure investment managers.

2. Philosophy

The Board recognizes the importance of sustainability factors such as (1) corporate governance and leadership factors; (2) environmental factors; (3) social capital factors; (4) human capital factors; and (5) business model and innovation factors, as provided under the Illinois Sustainable Investing Act. (Source: P.A. 90-507, eff. 8-22-97.)

IMRF believes there are qualified minority, woman, and person with a disability owned business enterprises. It is the policy of the Board to include qualified minority managers in the selection process and to objectively evaluate all qualified investment manager candidates regardless of race, gender, or disability.

All qualified investment manager candidates will be evaluated based on: demonstrated professional performance; organizational depth; institutional investment management capability; integration of sustainability factors; and reasonableness of fee structure, regardless of the amount of investment assets under management, or age of the investment management firm.

The Board will employ professional consultants that do not use discriminatory practices in the creation and maintenance of their investment manager databases and will require the consultants used by the Fund to affirm their use of nondiscriminatory practices when evaluating investment manager candidates.

Procurement Process

When a search is necessary to fill a need in the investment portfolio (e.g. termination of a manager or addition of a new mandate) a Request for Proposals (RFP) shall be prepared. The search will be advertised in the State newspaper and a notice will be posted on the IMRF website. The RFP shall be made available on the IMRF website at least fourteen days before the response is due. When appropriate, the RFP shall also be made available on the investment consultant's website.

An RFP process is not required to place additional assets with an investment management firm that already manages IMRF assets.

Upon termination of a manager, assets may be placed with any appropriate investment management firm and/or transition management firm pending a decision for final disposition by the Board.

3. RFP Specifications

The RFP will provide background information on IMRF and will request detailed information on matters relevant to the investment manager search being conducted. The RFP will generally be organized as follows:

(a) Introduction and Goal of the RFP

(b) Background Information on IMRF

(c) Services to be Performed

(d) Qualifications for the Assignment

(e) Specifications for the Assignment

(f) Requirements and Instructions for RFP Completion

(g) General Terms and Conditions of the Contract Including Performance Review Criteria

(h) Selection Process and Criteria

(i) Projected Timeline for Completion of the Manager Search

4. Quiet Period

The Quiet Period is the period of time beginning when the investment manager search RFP is issued and ends when the investment manager is selected by the Board, or the process is declared to be complete.

Investment manager respondents shall not contact IMRF Board members during the Quiet Period and should direct all communications to the Chief Investment Officer or the contact identified in the RFP.

The purpose of the Quiet Period is to ensure that all prospective investment managers have equal access to information regarding the search objective and requirements; to be certain that communications are consistent and accurate; and to make the search process and selection process efficient, diligent and fair.

The Quiet Period will be posted to the IMRF website to prevent inadvertent violations by investment managers responding to the RFP.

IMRF Board members shall refrain from communicating with the respondents regarding any product or service related to the search during the Quiet Period unless this communication takes place during a manager presentation related to the search recommendation.

IMRF Staff shall refrain from communicating with the respondents regarding any product or service related to the search during the Quiet Period unless this communication is initiated by the RFP team for information related to the search.

An investment manager respondent shall be disqualified for violating the Quiet Period.

5. Selection Process

For searches when a consultant is retained, Staff and consultant will work jointly. Staff shall objectively review the RFP's to identify qualified candidates for further evaluation.

Staff will present the results of the RFP process to the Investment Committee in the form of a written report. Staff will make a recommendation to the Board or the Investment Committee of the Board. The Board will consider the recommendation from Staff and determine if the award of a mandate will be made.

During the selection process all respondents to the RFP will be evaluated and ranked on five primary factors:

(a) **People -** stability of the organization, ownership structure, diversity efforts and documented experience of key professionals

(b) **Process -** clearly defined, reasonable and repeatable investment strategy

(c) **Performance -** documented ability to meet investment performance benchmarks

(d) **Pricing -** fee schedule, value of services provided, and associated costs

(e) **Portfolio Fit -** product strategy fit

Staff and consultant are required to identify all minority and woman owned firms and firms owned by a person with a disability in the report presented to the Investment Committee. The most qualified minority candidate(s) will be invited to present to the Board or the Investment Committee of the Board. Staff and consultant must specify the reason when these firms are not included in the recommendation.

IMRF reserves the right to reject respondents due to noncompliance with the requirements and instructions in the RFP.

IMRF also reserves the right to not hire or defer the hiring of any investment manager.

6. Contract Execution

Once the Board approves an investment mandate, Staff will complete all documentation necessary to execute recommendations subject to satisfactory legal due diligence. If the CIO determines that the legal due diligence is not satisfactory, then the contract will not be executed.

7. Website Postings required by Section 1-113.14 of the Illinois Pension Code.

Upon execution of an investment management agreement, a summary of the contract will be posted on the IMRF website in the Investments portal under Investment Managers. Results of manager searches conducted by RFP will be posted under Business Opportunities. Investments made without a formal RFP will be posted under Business Opportunities and shall name the person(s) authorizing the procurement and the reason for the exception.

B. Policy for the Selection of Investment Consultants

1. Purpose

This policy defines the process used by the Board to procure investment consultants.

2. Philosophy

The Board will use investment consultants that are fiduciaries with respect to the services they provide to make recommendations on investment strategy and asset allocation; report on the performance of the investment portfolio and investment managers; assist with the selection of investment managers; and recommend new investment opportunities.

3. Procurement Process

A search may be started due to an upcoming expiration of a contract, termination of an investment consultant or a need to add an investment consultant. A Request for Proposals (RFP) shall be prepared by Staff based on the investment consultant services needed. The RFP shall be advertised in the State newspaper and a notice will be posted on the IMRF website. The RFP shall be made available on the IMRF website at least fourteen days before the response is due. An RFP will be conducted every five years as required by Section 1-113.14 of the Illinois Pension Code.

4. RFP Specifications

The RFP will provide background information on IMRF and will request detailed information on matters relevant to the investment consultant search being conducted. The RFP will generally be organized as follows:

(a) Introduction and Goal of RFP

(b) Background Information on IMRF

(c) Services to be Performed

(d) Qualifications for Assignment

(e) Specifications for Assignment

(f) Requirements and Instruction for RFP Completion

(g) General Terms and Conditions of the Contract Including Criteria for the Evaluation of Performance

(h) Selection Process

(i) Projected Timeline for Completion of the Investment Consultant Search

5. Quiet Period

The Quiet Period is the period of time beginning when the investment consultant search RFP is issued and ends when the investment consultant is selected by the Board, or the process is declared to be complete.

Investment consultant respondents shall not contact IMRF Board members during the Quiet Period and should direct all communications to the Chief Investment Officer, or the contact identified in the RFP.

Incumbent investment consultant respondents may communicate with IMRF Board members during the Quiet Period, but may not discuss the investment consultant search with the Board during the Quiet Period.

The purpose of the Quiet Period is to ensure that all prospective investment consultants have equal access to information regarding the search objective and requirements; to be certain that communications are consistent and accurate; and to make the search process and selection process efficient, diligent, and fair.

The Quiet Period will be posted to the IMRF website to prevent inadvertent violations by investment consultants responding to the RFP.

IMRF Board members shall refrain from communicating with the respondents regarding any product or service related to the search during the Quiet Period unless this communication takes place during a Consultant presentation related to the search recommendation.

IMRF Staff shall refrain from communicating with the respondents regarding any product or service related to the search during the Quiet Period unless this communication is initiated by the RFP team for information related to the search.

An investment consultant respondent shall be disqualified for violating the Quiet Period.

6. Selection Process

Staff shall objectively review the RFP responses and select qualified candidates for further evaluation. Staff will prepare a report and make a recommendation to the Investment Committee.

The Investment Committee will consider Staff's recommendation and will determine if a recommendation for the award of a contract will be made to the Board. The Board shall then act on the recommendation of the Investment Committee.

During the selection process all respondents to the RFP will be evaluated and ranked based upon:

(a) Organization - stability, ownership, documented experience of key professionals, and diversity efforts.
(b) Consulting Skill - investment philosophy, investment manager information collection and monitoring systems, risk management tools, performance measurement systems and breadth of consulting expertise and experience.
(c) Fees - Consulting fees for services requested and associated costs.
(d) Fit with IMRF's culture and portfolio needs.

Staff is required to identify all minority and woman owned firms and firms owned by a person with a disability in the report presented to the Investment Committee. Staff must specify the reasons when these firms are not included in the recommendation.

IMRF reserves the right to reject any respondents due to noncompliance with the requirements and instructions in the RFP.

IMRF also reserves the right to not hire or defer the hiring of any investment consultant.

7. **Contract Execution**

When the contract has been awarded by action of the IMRF Board of Trustees, Staff will take the steps necessary to retain the investment consultant including negotiations and execution of the contract. The term of the contract shall not exceed five years.

Upon execution of the contract, a summary of the contract will be posted on the IMRF website, as required by Section 1-113.14 of the Illinois Pension Code.

X. Public Access to Records

All records of investment transactions maintained by the Fund are available for public inspection and copying as provided by the rules and regulations adopted by the Board pursuant to the Illinois Freedom of Information Act.

APPENDIX

Appendix A

A. Proxy Voting Policy

Objectives

The IMRF Board of Trustees acknowledges that proxies are a significant and valuable tool in corporate governance and therefore have economic value. The Fund recognizes its fiduciary responsibility and commits to managing its proxy voting rights with the same care, skill, prudence, and diligence as is exercised in managing its other assets. In accordance with the "exclusive benefit rule" the primary objective is to act solely in the economic interest of the Fund's members and beneficiaries and vote with the intent to maximize the long-term value of IMRF's investments. Through its proxy voting policy, IMRF supports management and board of directors who act in the best interest of shareowners by promoting corporate accountability, financial transparency, and responsibility.

Delegation

The responsibility for voting proxies for IMRF's domestic accounts, inclusive of internally managed portfolio(s), is delegated to IMRF Investment Staff. Staff utilizes a third-party proxy voting advisor to vote domestic proxies in accordance with the IMRF proxy voting policy. To the extent that IMRF's Proxy Voting Guidelines are silent on an issue or are subject to interpretation, the votes default to the recommendations of our third-party proxy advisor based on the advisor's policy. The IMRF Investment Staff retains the ability to override the proxy advisor's recommendations or manually vote any proxy at all times.

The responsibility for voting proxies for IMRF's international and global accounts is delegated to IMRF's respective investment managers for these mandates. The investment manager must vote, or have its delegate vote, in accordance with the IMRF proxy voting policy. To the extent that Proxy Voting Guidelines are silent on an issue or are subject to interpretation on a matter put to a shareholder vote, the Investment Manager will use reasonable judgement as a fiduciary to IMRF and determine how to vote or not to vote the proxy. The Investment Manager will handle elective corporate actions with respect to the issuers of securities in which the assets held by the master trustee are invested in accordance with its reasonable judgement as a fiduciary to IMRF.

Monitoring and Reporting

Staff reports on the proxy voting program to the Board annually.

The third-party proxy voting advisor must maintain records of any domestic proxy votes cast and allow Staff access to the records through its online platform.

International investment managers with the responsibility to vote on behalf of IMRF must maintain records of any proxy votes cast and provide reports at least quarterly and upon request.

Securities out on Loan
IMRF utilizes a securities lending program and securities may be out on loan during the time when proxies must be voted. Recalling loaned securities for proxy voting purposes is an exception rather than the general rule and will only be utilized when the CIO determines that the proxy voting issue clearly outweighs the cost of recalling the security.

Loaned securities held by an international investment manager will be recalled for purposes of voting proxies only when the international investment manager determines there is a significant reason to recall the loan in order to vote the proxy.

Case-by-Case Exceptions
Case-by-case exceptions are proxy issues that are not addressed by IMRF's proxy voting policy. When these exceptions arise, Staff will review the proposals, company recommendations and third-party proxy voting advisor research and provide a voting recommendation to the CIO for final determination before voting the proxy.

Privately held companies are not covered by IMRF's third party proxy voting advisor's research. When these exceptions arise, Staff will review the proposals, company recommendations, and consult with the investment advisors that hold the stock and provide a voting recommendation to the CIO for final determination before voting the proxy.

Proxy Voting Guidelines
The following proxy voting guidelines provide the basis for Staff, an international investment manager or a designated third-party proxy voting advisor to vote IMRF's proxies. The IMRF proxy voting policy centers on issues relating to Corporate Governance; Compensation; Takeover Defenses; Capital Structure; Corporate Restructurings; Political Expenditures; and Routine Management Issues.

A. **Corporate Governance**

IMRF believes that corporate boards should act in the best interest of shareowners, therefore, IMRF will vote in favor of the following shareholder-sponsored proposals:

1. boards with a majority of independent directors

2. audit, nominating and compensation committees that are made up of all independent directors

3. a separation of the Chairman and CEO positions*

4. restrictions on exercising options (3 – 5 years) if directors are paid with options

5. the rotation of outside auditors at least every 5 years*

6. disclosure of each director's attendance at board and committee meetings

7. a fixed size board

8. a declassified board

9. a stipulation that directors need to be elected with an affirmative majority of votes cast, provided it does not conflict with the state law where the company is incorporated. However, binding resolutions need to allow for a carve-out for a plurality vote standard when there are more nominees than board seats.

10. a call for non-binding shareholder ratification of the compensation of the Named Executive Officers and the accompanying narrative disclosure of material factors (i.e. say-on-pay proposals)

    (*can be decided on a case-by-case basis)

To further enhance good corporate governance IMRF will vote in opposition to or withhold votes on the following:

1. directors with poor attendance, missing 75% of the meetings

2. directors who serve on too many boards

3. boards that are not majority independent (withhold from the non-independent directors)

4. boards that have non-independents serving on key committees (withhold from the non-independents on such committees)

5. boards that fail to replace poor management

6. boards that lack accountability and oversight, coupled with sustained poor performance relative to peers

7. boards that adopt or renew poison pills without shareholder approval

8. boards that adopt or renew egregious anti-takeover devices such as dead hand pills

9. boards that amend company's bylaws, without shareholder approval, that diminish shareholder rights

10. auditors who receive substantial fees for non-auditing services

11. audit committees who pay substantial fees for non-audit services

12. audit committees who receive an adverse opinion on the company's financial statements from the external auditor

13. audit committees or boards where there are poor accounting practices, which rise to a level of serious concern, such as: fraud; misapplication of GAAP; and material weaknesses identified in Section 404 disclosures, are identified

14. audit committees where there is persuasive evidence that the audit committee entered into an inappropriate indemnification agreement with its auditor that limits the ability of the company, or its shareholders, to pursue legitimate legal recourse against the audit firm

15. compensation committees when there is a negative correlation between the chief executive's pay and company performance

16. compensation committees when the company has poor compensation practices

17. boards that ignore shareowner proposals that are approved by a majority of shareowners (majority of votes cast in the previous year)

18. boards that fail to act on takeover offers where a majority of shareowners tendered their shares

19. limited liability for directors who violate their fiduciary duty to shareowners

20. indemnification of directors for intentional or criminal acts beyond negligence

21. mandatory retirement age for directors

22. term limits for directors

23. proposals requiring two candidates per board seat

24. proposals restricting shareowners' ability to elect directors

B. Proxy Access

IMRF believes that companies should allow shareholder access to the director nomination process and to the company's proxy statement. Therefore, IMRF will vote favorably when all of the following provisions are met:

1. Ownership threshold: Shareholders with at least three percent (3%) of the voting power;

2. Ownership duration: At least three (3) years of continuous ownership for each member of the nominating group;

3. Aggregation: A minimum of 15 shareholders are required to form a nominating group;

4. Cap on Nominees: Nominating group will not exceed twenty-five percent (25%) of the board.

C. Director, Executive, and Employee Compensation

IMRF believes that compensation plans should motivate directors, executives, and employees to achieve high performance for the long-term benefit of all shareowners, therefore, IMRF will vote in favor of the following:

1. annual advisory votes on executive compensation (management say on pay)

2. reasonable compensation plans included in management sponsored say on pay proposals for executives and directors*

3. reasonable compensation for directors

4. complete disclosure of executive and director compensation

5. non-excessive pay plans that award cash, stock, or a combination of the two based upon company and individual performance if the plans are approved by shareowners

6. specified option holding periods for executives paid with stock options*

7. reasonable stock ownership requirements*

8. putting executive benefit agreements to a shareowner vote

9. putting supplemental retirement plans for executives to a shareowner vote

10. employee stock purchase plans and 401(k) plans*

(*can be decided on a case-by-case basis)

To further ensure that executive compensation is reasonable IMRF will generally vote in opposition to the following:

1. excessive compensation plans

2. poorly designed compensation plans that fail to align executive's interests with that of shareholders

3. re-pricing of stock options given to executives when the option price is above the market price*

4. proposals to eliminate shareowner approval of option re-pricing

5. plans that increase supplemental retirement benefits for top executives*

6. compensation plans that would cause substantial shareholder value transfer*

7. compensation plans that would result in excessive burn rate (also known as run rate)*

8. any compensation paid to directors beyond the time of their service on the board

9. unreasonable compensation, benefit packages, or club memberships for directors

10. reimbursement of unreasonable travel expenditures by directors

(*can be decided on a case-by-case basis)

D. Board Diversity

IMRF believes that increasing diversity in the boardroom enhances shareholder value. Therefore, IMRF will vote in favor of:

1. Generally vote for request for reports on company's efforts to diversify the board

IMRF will not vote in favor of:

1. Individual directors (except new nominees) who: Serve as members of the nominating committee and have failed to establish gender and/or racial diversity on the board. If the company does not have a formal nominating committee, vote against/withhold votes from the entire board of directors

E. Equal Opportunity

IMRF recognizes the importance of gender and ethnic diversity. IMRF will vote in favor of proposals requesting a company to disclose its diversity policies or initiatives, or proposals requesting disclosure of a company's comprehensive workforce diversity data, including requests for EEO-1 data.

F. Takeover Defenses

IMRF believes that shareowners should be asked their opinion ofcertain anti-takeover devices and, therefore, will vote in favor of the following:

1. proposals that allow shareowners to vote on poison pills and golden parachutes

IMRF believes that attempts by corporate boards to block takeovers generally hurt shareowner value, therefore, IMRF will generally vote in opposition to the following:

1. "blank check" preferred stock giving the board very broad discretion in establishing voting, dividend, conversion, and other rights, that can be used as an anti-takeover device

2. issuance of stock with unequal voting rights

3. creation of new securities with superior voting rights

4. "golden and tin parachutes" (severance agreements) between a company and executive management contingent on a change in corporate control*

5. "poison pill" devices to make target companies financially unattractive*

6. "greenmail", the purchase of a large block of stock at a premium price, by the company from shareowners seeking control

7. classified boards, preventing the possibility of all directors being replaced at once

8. proposals requiring a supermajority shareowner vote

(*can be decided on a case-by-case basis)

G. Capital Structure

As long term shareowners IMRF is concerned about the capital structure of corporations in which it invests, therefore, IMRF will vote in favor of the following:

1. proposals requiring shareowner approval for a reasonable increase in shares necessary for business purposes

IMRF will generally vote in opposition to the following:

1. increases in the amount of preferred stock that dilutes the voting power of common shares

2. the creation of new classes of securities with superior voting rights

Because of the unique circumstances of individual companies, IMRF will vote on the following issues on a case-by-case basis:

1. recapitalizations and reverse stock splits

2. increases in common stock

3. increases in preferred stock

4. private placement warrants and convertible debentures

5. proposals that preserve preemptive rights and the opportunity to purchase, pro rata, newly issued shares in the company

6. a change in a company's state of incorporation

7. increases in stock that significantly reduce shareowner value or voting power

H. Merger, Acquisitions, and Corporate Restructurings

Due to the complexity of issues that arise during mergers, acquisitions, and corporate restructurings (taking a company private or forming a joint venture) IMRF will vote proxies on a case-by-case basis after obtaining adequate information about what action is in the best interest of the Fund as a shareowner.

I. Routine Management Issues

IMRF believes that most management issues, having either a direct or indirect effect on the conduct of business and corporate profitability, should remain management responsibility and, therefore, IMRF will generally support management's view on such issues.

J. Political Expenditures

IMRF believes that all political expenditures should be approved by the board of directors and disclosed to shareowners. IMRF will vote for proposals that require board approval and disclosure of all political expenditures.

K. Social, Political, and Environmental Issues

The Board recognizes the importance of sustainability factors such as (1) corporate governance and leadership factors; (2) environmental factors; (3) social capital factors; (4) human capital factors; and (5) business model and innovation factors, as provided under the Illinois Sustainable Investing Act. (Source: P.A. 90-507, eff. 8-22-97.)

IMRF will generally support proposals seeking greater disclosure of a company's environmental, social, and sustainability risks and practices. The following factors will be considered:

1. If the issues presented in the proposal are more appropriately or effectively dealt with through legislation or government regulation;

2. If the company has already responded in an appropriate and sufficient manner to the issue(s) raised in the proposal;

3. Whether the proposal's request is unduly burdensome (scope or timeframe) or overly prescriptive;

4. The company's approach compared with any industry standard practices for addressing the issue(s) raised by the proposal;

5. Whether there are significant controversies, fines, penalties, or litigation associated with the company's environmental or social practices;

6. If the proposal requests increased disclosure or greater transparency, whether reasonable and sufficient information is currently available to shareholders from the company or from other publicly available sources; and

7. If the proposal requests increased disclosure or greater transparency, whether implementation would reveal proprietary or confidential information that could place the company at a competitive disadvantage.

IMRF recognizes that many laudable social and political issues regularly come before the shareowners for a vote. In keeping with the Board's fiduciary duty to act solely in the economic interest of the Fund, IMRF will abstain from voting on such proposals.

Appendix B

B. Securities Lending Policy

Purpose
The IMRF Board recognizes that a risk-adjusted securities lending program can provide incremental income and directs that a securities lending program be operated by a third party on behalf of the Fund. IMRF's master trustee, Northern Trust, is the third-party administrator of this program. IMRF's Securities Lending Policy governs the securities lending activities of the Fund. The Policy applies to the lending of publicly traded securities, held in externally and internally managed separate accounts, for which IMRF is the beneficial owner. The Policy does not apply to securities held in commingled investments, which are not held solely by IMRF.

Objectives
The objectives of the securities lending program are to:

- Generate income from lending the Fund's securities to qualified borrowers

- Ensure that income generated from securities lending is sufficient tojustify the risks associated with counterparty borrowers, the investment of cash collateral received and the acceptance of non-cash collateral

- Minimize risk to a reasonable and acceptable level with respect to both the broker/borrower, the collateral received, and the reinvestment of cash collateral

- Ensure that the operation of the securities lending program will not interfere with overall portfolio management activities

Securities Lending Program Overview
Securities lending occurs when a security is transferred (i.e. loaned) from IMRF to a borrower, such as a broker-dealer or bank, for cash or non-cash collateral pursuant to an agreement to return the identical security in the future. Securities are borrowed for a variety of reasons including: settlement of short sales; covering hedges, options, arbitrage positions, and settlement fails. Consequently, the borrower receives custody of the transferred (i.e. loaned) security and has the right to resell it. The borrower, however, is obligated to return an identical security (comparable security in fixed income lending) at the end of the loan period and make IMRF whole for dividends, interest, and other distributions received during the borrowing period. IMRF, as lender, is obligated to return the collateral and a portion of the interest earned on collateral (known as rebate amount) to the borrower.

Staff Responsibilities

1. Staff is responsible for monitoring the third-party securities lending program administrator.

2. On a semi-annual basis, Staff will meet with the third-party securities lending program administrator to review the securities lending program. Staff will make recommendations to the Chief Investment Officer as necessary.

3. If deemed necessary by the Chief Investment Officer and Consultant, recommendations regarding a third-party securities lending program administrator will be presented to the Board for their approval.

4. Monitor the daily cash and non-cash collateral levels against margin requirements for US (102%) and International (105%) securities on loan.

5. Monitor IMRF's daily pro-rata share of the cash collateral reinvestment vehicle.

6. Ensure that all income and fees directly attributable to the securities lending program are posted to the Fund's cash flow account.

7. Instruct the third-party securities lending program administrator to recall a specific security when necessary.

Risk Management
IMRF utilizes a third-party securities lending program administrator to invest cash collateral and manage counterparty risk.

A. Cash Reinvestment Risk

The primary risk associated with securities lending is the risk that the principal and earnings of the invested cash collateral will not be sufficient to cover the rebate amount owed to the borrowers by IMRF.

Cash reinvestment risk is mitigated by prudently investing cash collateral received.

The key investment goals for investing cash collateral are to: a) safeguard principal; b) maintain adequate liquidity; and c) optimize the spread between the collateral earnings and the rebate paid to the borrowers.

B. Counterparty Risk

Counterparty risk is the risk that a borrowing broker will not return a loaned security.

This risk is mitigated and managed by activities such as monitoring the loan volume with each broker, holding excess collateral, marking collateral to market daily, and having indemnification from lending agents against borrower default, as appropriate. Northern Trust, as third-party securities lending program administrator, is responsible for managing counterparty risk, and will only utilize borrowers that agree to acceptable make-whole or indemnification provisions in the event a borrower has failed to return the loaned securities within the standard settlement period.

The counterparty risk is assumed by the third-party securities lending program administrator who will make IMRF whole in the event of a borrower default.

Reinvestment of Cash Collateral

Cash collateral will be invested by Northern Trust, the third-party securities lending program administrator, in the Northern Trust Collective SL Core Short Term Investment Fund, on behalf of IMRF.

The third-party securities lending program administrator's guidelines for investing cash collateral in Northern Trust's Collective SL Core Short Term Investment Fund are as follows:

1. Securities Loan Agreements shall be entered into with borrowers whose financial condition and credit worthiness have been evaluated by the third-party securities lending program administrator.

2. All security loans shall be over-collateralized by cash or government obligations which may be accepted without limit. The amount of collateral, subject to de minimis rules, for U.S. securities must be equal to at least 102 percent of the loaned securities market value and all interest accrued through the date of such market value determination. For non-U.S. securities, the amount of collateral must be equal to at least 105 percent of the loaned securities market value and all interest accrued through the date of such market value determination.

3. When cash collateral is used the following shall be eligible investments as defined by the third-party securities lending program administrator:

   (a) U.S. Government Securities – Obligations issued or guaranteed as to principal and interest by the United States Government or its agencies or instrumentalities and custodial receipts with respect thereto.

(b) Bank Obligations – Obligations of U.S. or non-U.S. banks and bank holding companies including but not limited to commercial paper, banker's acceptances, certificates of deposit, time deposits, notes and bonds.

(c) Corporates – Obligations of U.S. or non-U.S. corporations including commercial paper, notes, bonds, and debentures.

(d) Foreign Governments – Obligations issued or guaranteed by OECD (Organization for Economic Cooperation and Development), governments, or political subdivisions and their agencies and instrumentalities.

(e) Money Market Funds – Units or shares of registered money market funds or institutional cash funds, global liquidity funds, or other pooled investment vehicles including those funds in which the Agent or its affiliates act as investment advisor, custodian, sponsor, administrator, transfer agent or similar capacity.

(f) Repurchase Agreements – Fully collateralized repurchase agreements with counterparties approved by the master trustee's Trust Credit Committee at the time of purchase.

(g) Floating and Variable Rates – Adjustable-rate securities will be limited to those securities whose rates are reset based upon an appropriate money market index including LIBOR, the Fed Fund Rate or Treasury Bills, Certificate of Deposit Composite, and Commercial Paper Composite.

(h) Daily Residual Cash Balances – End of day residual cash balances, which cannot be invested in the marketplace, will be swept into a constant $1 Net Asset Value (NAV) short-term investment vehicle with The Northern Trust Company or any of its worldwide branches or affiliated U.S. or non-U.S. banks or bank holding companies.

(i) Asset-Backed Commercial Paper – Asset-backed commercial paper, excluding structured investment vehicles (SIV) or extendable commercial notes (ECN and liquidity notes (LN), with a maturity no longer than 270 days.

4. When cash collateral is used the following maturity/liquidity investment restrictions shall apply as defined by the master trustee:

   (a) A minimum of 60% of the Cash Collateral Fund shall be invested in securities which have a maturity (as herein defined) of 97 days or less.

   (b) A minimum of 20% of the Cash Collateral Fund shall be available each business day. This may be satisfied by maturities (as herein defined), or demand features.

   (c) The weighted average maturity, as measured to the shorter of the remaining time until the interest rate reset (if applicable) or maturity, of the Cash Collateral Fund will be limited to 60 days.

   (d) The weighted average life, as measured to maturity (as herein defined), of the Cash Collateral Fund shall not exceed 120 days.

   (e) Floating rate and variable rate investments must have interest rates that may be reset at least every 97 days.

   (f) Except for asset-backed commercial paper and variable rate eligible government securities, the maturity of investments may not exceed 13 months from the date of purchase. The maturity of asset-backed commercial paper shall not exceed 97 days. The maturity of variable rate eligible government securities may not exceed 762 days.

5. Cash Collateral Diversification

   (a) Subject to the following exceptions, a maximum of 5% of the Cash Collateral Fund may be invested in securities or instruments of any one issuer or obligor. Exceptions are as follows:

      (i) 100% of the Cash Collateral Fund may be invested in obligation issued or guaranteed by the U.S. Government or its agencies/instrumentalities.

      (ii) 25% of the Cash Collateral Fund may be invested with any single counterparty in repurchase agreements collateralized by U.S. Government or U.S. Government agency securities.

      (iii) 10% of the Cash Collateral Fund may be invested with any single counterparty in repurchase agreements collateralized by securities other than U.S. Government or U.S. Government agency securities.

(b) A maximum of 25% of the Cash Collateral Fund may be invested in obligations of issuers having their principal business in the same industry with the exception of the banking industry.

(c) For repurchase agreements collateralized by securities other than U.S. Government or U.S. Government agencies, no more than 10% of the Cash Collateral Fund may be invested in each type of repo collateral. No more than 35% of the Cash Collateral Fund may consist of repurchase agreements collateralized by non-U.S. Government or U.S. Government agency securities.

(d) Asset backed commercial paper shall be subject to a 5% per issuer limit.

(e) A maximum percentage of the Cash Collateral Fund which may be exposed to the risks of any one country shall be established from time to time by Agent.

Non-Cash Collateral

Non-cash collateral will be retained in a separate account for IMRF.

IMRF has instructed the third-party securities lending program administrator to only accept U.S. Government Securities as non-cash collateral.

Investment Staff, in conjunction with the Consultant and the third-party securities lending program administrator, will periodically review non-cash collateral types and determine if changes for eligible non-cash collateral are needed.

Appendix C

C. Securities Litigation Policy

Purpose
IMRF has a fiduciary duty to preserve trust assets to meet the retirement obligations to its members. Included in this duty is the obligation to recover losses in public securities as a result of corporate mismanagement and/or fraud. To preserve Fund assets, the Board has adopted this securities litigation policy to guide the Fund's involvement in securities litigation.

Principal Responsibilities
Overall coordination of monitoring and managing the securities class action activities shall be by the Chief Investment Officer, in coordination with the General Counsel. Decisions regarding securities litigation will be reviewed and approved by the Executive Director.

Monitoring
Securities fraud claims within the investment portfolio are monitored by qualified securities litigation legal service providers.

The Fund's master trustee is responsible for monitoring and filing class action claims in all U.S. and Canadian based litigation settlements related to publicly traded securities held in externally and internally managed separate accounts in which IMRF has an interest. For class action litigation in the U.S. and outside the U.S. and Canada, IMRF will utilize a third party securities litigation legal service provider to represent IMRF. Decisions regarding participating in U.S. and non-U.S. based litigation, which may include "loser pays" jurisdictions, will be made by the Chief Investment Officer in conjunction with the General Counsel, Public Markets Investment Officer, and Executive Director.

On an annual basis, Staff will meet with the master trustee to review the class action processing program. Staff also reviews the master trustee's semi-annual Service Organization Control (SOC 1) Report.

Case Identification
When the IMRF threshold level for estimated loss of $1.5million for non-U.S. litigation and $2.5 million for U.S. litigation is met, the securities litigation legal service provider will notify the General Counsel and the designated Investment Staff.

Case Evaluation

1. Cases in which the potential impact does not meet or exceed the IMRF threshold will not require additional internal evaluation unless other factors indicate some value in further analysis. Unless further analysis is undertaken, these cases will be monitored and reviewed to

make sure all appropriate claims are filed and distributions collected in a timely manner.

2. Cases with the potential of meeting or exceeding the IMRF threshold shall be further evaluated by the General Counsel in conjunction with the Chief Investment Officer to determine which of the following alternative courses of action is appropriate:

   (a) Monitoring the course of the litigation and filing a claim at its conclusion to participate in any class payment.

   (b) Monitoring the course of the litigation and objecting to the attorneys' fee petition, if there are reasons to object.

   (c) Monitoring the course of the litigation and objecting to the proposed settlement, if there are reasons to object.

   (d) If any applicant for lead plaintiff is an entity which appears to be of limited capability to effectively serve as class representative, the fund may seek to inform the court of its concerns, either formally or informally, or may support another applicant which appears to be more capable.

   (e) Seeking to control the litigation by applying for designation as lead plaintiff, either individually or with others. However, IMRF does not have the Staff resources to serve as lead plaintiff. Therefore, absent extraordinary circumstances, IMRF will not apply to be lead plaintiff.

   (f) Opting out of the class action litigation and filing a separate lawsuit, either individually or with others.

Active Participation

1. The Chief Investment Officer and General Counsel will make a recommendation to the Executive Director for any course of action beyond filing claims and objecting to attorneys' fee petitions. The Executive Director will decide whether to approve actions beyond filing claims and objecting to fee petitions.

2. Where a determination has been made that the interests of the Fund will be best served by seeking designation as lead plaintiff or by opting out of a class action, Staff will choose legal counsel and will negotiate a fee agreement at the direction of the Executive Director.

D. Procedures for Amending Policy Statement

This statement of investment policy may be amended by a majority vote of the Board. Recommendations for policy changes should be directed to the Chief Investment Officer. The Chief Investment Officer shall review all such recommendations in conjunction with the Investment Consultant as necessary. The Chief Investment Officer is responsible for submitting necessary changes to the Board for approval.

The Statement of Investment Policy and Investment Committee Charter shall be reviewed annually.

Appendix E

E. Annual Certification Process

Annual Requests for Required Certifications, Equal Employment Opportunity Commission (EEOC) Statistics and ADV Forms will be sent to all entities (except partnership agreements where information is previously provided in a side letter) providing investment management/advisory and master trust services to the Illinois Municipal Retirement Fund (IMRF).

Public Market Investment Managers, Investment Consultants, and Master Trustee, as applicable, will provide the following items:

- High Risk Home Loan Act Requirements
    - Illinois Finance Entity Certification (Required)
    - IMRF Certification of Compliance – Illinois High Risk Home Loan Act (If Applicable)
- Disclosure of Fees, Commissions, Penalties and Other Compensation Certification
- IMRF Disclosure Schedule Certification
- Minority, Woman, and Person with a Disability Owned Business Certification
- EEOC Diversity Profile Template
- Certificates of Insurance
    - Professional Liability Insurance including Errors & Omission covering Investment Manager's fiduciary responsibility for all services
    - Financial Institution Blanket Bond Coverage including Computer Crime (covering Employee Dishonesty)
    - Commercial General Liability
    - Umbrella Liability coverage
    - Workers compensation with statutory benefits and any other insurance required by law of the Investment Manager
- Outstanding ADV Forms – if not previously provided by the investment entity

Private Market Investment Managers will provide the following items:

- EEOC Diversity Profile Template
- Form PF
- Outstanding ADV Forms – if not previously provided by the investment entity.

Appendix F

F. <u>Illinois High Risk Home Loan Act Certification of Compliance</u>

Illinois Municipal Retirement Fund

Certification of Compliance

Illinois High Risk Home Loan Act

I, ____________________________, serving in the capacity of ________________________, on this ____ day of ________________, 2023, being duly sworn and having knowledge of all matters set forth herein, state, affirm and certify as follows:

1. I represent ____, and I am duly authorized to provide this certificate on its behalf.

2. I am aware of the requirements of Section 1-110.10 of the Illinois Pension Code (40 ILCS 5/1-110.10), as well as the requirements of the High Risk Home Loan Act, (Act), and any rules adopted pursuant thereto.
3. Under the terms of the Illinois Pension Code, ___________________________________ is deemed an Illinois Finance Entity.
4. I am aware that no pension fund assets may be handled by the Illinois Finance Entity if it is not in compliance with the provisions of the High Risk Home Loan Act, including the filing of a completed certification with the Illinois Municipal Retirement Fund.
5. I certify that ____ is in compliance with all the requirements of the High Risk Loan Act and the rules adopted pursuant to the Act.

____
(Firm)
____
(Signature)
______________ ________ ________
(Name of Officer)
____
(Title)

Subscribed and sworn before me by _________________ on this ____ day of ________________, 2023.

____
Notary
*My Commission Expires:*____________________
(*Seal*)
(Firm)
State of ______________________)
County of ____________________)

G. Disclosures per Illinois Pension Code Section 1-113.21

Disclosures per Illinois Pension Code Section 1-113.21

Beginning January 1, 2015, section 1-113.21 of the Illinois Pension Code requires the following disclosure from the investment advisor, consultant or private market fund. Please complete items numbered 1, 2 and 3.

Name of investment advisor, consultant, or private market fund: ________________

Data as of: ________________

1. The number of its investment and senior staff and the percentage of its investment and senior staff who are (i) a minority person (ii) a woman, and (iii) a person with a disability[1].

[A numerical value must be entered in each box. If this information is not available or your firm does not track, enter 0.]

Staff Classification	Number of Investment and Senior Staff Who Are	% Percentage of Investment and Senior Staff Who Are
Minority person (Men and Women)		%
Woman (Non-Minority Women)		%
Person with a Disability (Men and Women)		%

2. The number of contracts, oral or written, for investment services, consulting services and professional and artistic services that the investment advisor, consultant, or private market fund has with (i) a minority owned business, (ii) woman owned business, or (iii) a business owned by a person with a disability[1].

[A numerical value must be entered in each box. If this information is not available or your firm does not track, enter 0.]

Business Classification	**Number of Contracts**
Minority owned business (Men and Women)	
Woman owned business (Non-Minority)	
Business owned by a person with a disability (Men and Women)	

3. The number of contracts, oral or written, for investment services, consulting services, and professional and artistic services the investment advisor, consultant, or private market fund has with a business other than (i) a minority owned business, (ii) woman owned business or (iii) a business owned by a person with a disability, if more than 50% of services performed pursuant to the contract are performed by (i) a minority person, (ii) a woman, and (iii) a person with a disability[1].

[A numerical value must be entered in each box. If this information is not available or your firm does not track, enter 0.]

Classification of Person Performing Services at Majority owned firm	**Number of Contracts**
Minority person (Men and Women)	
Woman (Non-Minority)	
Person with a Disability (Men and Women)	

INVESTMENT ADVISOR / CONSULTANT/ PRIVATE MARKET FUND:
Company Name:
Signature:
Printed Name:
Title:
Dated:

Note: Please read the following pages for classification definitions and an example. If you have further questions, please contact IMRF.

Illinois Public Act 98-1022 website:
http://www.ilga.gov/legislation/publicacts/98/PDF/098-1022.pdf
Business Enterprise for Minorities, Women and Persons with Disabilities Act website: http://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=550&ChapterID=7

[1]Definitions per Illinois Law
Illinois Legislation & Laws website: http://www.ilga.gov/

"**Contract**" means all types of [State] agreements, regardless of what they may be called, for the procurement, use, or disposal of supplies, services, professional or artistic services, or construction or for leases of real property where the [State] is the lessee, or capital improvements, and including renewals, master contracts, contracts for financing through use of installment or lease-purchase arrangements, renegotiated contracts, amendments to contracts, and change orders.

"Investment adviser", "investment advisor", or "investment manager" with respect to a pension fund or retirement system established under Illinois Code if the person:

(1) is a fiduciary appointed by the board of trustees of the pension fund or retirement system in accordance with Section 1-109.1;

(2) has the power to manage, acquire, or dispose of any asset of the retirement system or pension fund;

(3) has acknowledged in writing that he or she is a fiduciary with respect to the pension fund or retirement system; and

(4) is at least one of the following: (i) registered as an investment adviser under the federal Investment Advisers Act of 1940 (15 U.S.C. 80b-1, et seq.); (ii) registered as an investment adviser under the Illinois Securities Law of 1953; (iii) a bank, as defined in the Investment Advisers Act of 1940; or (iv) an insurance company authorized to transact business in this State.

"Minority person" means a person who is a citizen or lawful permanent resident of the United States and who is a member of a minority as defined in the Business Enterprise for Minorities, Women, and Persons with Disabilities Act.

(a) American Indian or Alaska Native (a person having origins in any of the original peoples of North and South America, including Central America, and who maintains tribal affiliation or community attachment).

(b) Asian (a person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, but not limited to, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam).

(c) Black or African American (a person having origins in any of the black racial groups of Africa).

(d) Hispanic or Latino (a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race).

(e) Native Hawaiian or Other Pacific Islander (a person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands).

"**Woman**" means a person who is a citizen or lawful permanent resident of the United States and who is of the female gender. For the purposes of this disclosure only include non-minority woman in this category.

"**Person with a disability**" means a person who is a citizen or lawful resident of the United States and is a person qualifying as a person with a disability.

"**Minority owned business**" means a business concern which is at least 51% owned by one or more minority persons, or in the case of a corporation, at least 51% of the stock in which is owned by one or more minority persons; and the management and daily business operations of which are controlled by one or more of the minority individuals who own it.

"**Woman owned business**" means a business concern which is at least 51% owned by one or more woman, or, in the case of a corporation, at least 51% of the stock in which is owned by one or more woman; and the management and daily business operations of which are controlled by one or more of the women who own it.

"**Business owned by a person with a disability**" means a business concern that is at least 51% owned by one or more persons with a disability and the management and daily business operations of which are controlled by one or more of the persons with disabilities who own it. A not-for-profit agency for persons with disabilities that is exempt from taxation under Section 501 of the Internal Revenue Code of 1986 is also considered a "business owned by a person with a disability".

<u>Example</u>

An investment manager has an investment and senior staff of 10 people that are citizens or lawful permanent residents of the United States. These individuals make up the following categories: 1 Asian, 2 African American, 2 Hispanic and 3 Woman (non-minority).

- Minority person equal 5 or 50% of investment and senior staff
- Woman equal 3 or 30% of investment and senior staff
- Person with a disability equal 0 or 0% of investment and senior staff

Appendix H

H. Disclosures per Illinois Pension Code Section 1-113.22 and 1-113.23

Beginning January 1, 2018 and annually thereafter, section 1-113.22 of the Illinois Pension Code requires the following disclosures from the consultant:

Consultant Name: ____
Data as of:______________________

1.	Firm wide, the total number of searches for investment services made by the consultant in the prior calendar year.	
2.	Firm wide, the total number of searches for investment services made by the consultant in the prior calendar year that included a minority owned business, woman owned business or a business owned by a person with a disability.	
3.	The total number of searches for investment services made by the consultant in the prior calendar year in which the consultant recommended for selection a minority owned business, woman owned business, or a business owned by a person with a disability.	
4.	The total number of searches for investment services made by the consultant in the prior calendar year that resulted in the selection of a minority owned business, woman owned business or a business owned by a person with a disability.	
5.	The total dollar amount of investments made in the previous calendar year with a minority owned business, woman owned business or a business owned by a person with a disability that was selected after a search for investment services performed by the consultant.	

Beginning January 1, 2018 and annually thereafter, section 1-113.23 of the Illinois Pension Code requires the following disclosures from the consultant:

1. Consultant(s) are required to disclose all compensation and economic opportunity received in the last 24 months from investment advisors retained by the IMRF Board of Trustees.

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2. Prior to the IMRF Board of Trustees selecting an investment advisor, the consultant(s) are required to disclose any compensation or economic opportunity received in the last 24 months from an investment advisor that is recommended for selection by the consultant.

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Consultant
Company Name:
Signature:
Printed Name:
Title:
Dated:

Illinois Public Act 100-0542 website: http://www.ilga.gov/legislation/publicacts/fulltext.asp?Name=100-0542

Definitions per Illinois Law

"**Compensation**" means any money, thing of value, or economic benefit conferred on, or received by, a consultant in return for services rendered, or to be rendered, by himself, herself, or another.

"**Economic opportunity**" means any purchase, sale, lease, contract, option, or other transaction or arrangement involving property or services wherein a consultant may gain an economic benefit.

"Minority person" means a person who is a citizen or lawful permanent resident of the United States and who is a member of a minority as defined in the Business Enterprise for Minorities, Women, and Persons with Disabilities Act. The full text can be found at: http://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=550&ChapterID=7

"**Minority owned business**" means a business concern which is at least 51% owned by one or more minority persons, or in the case of a corporation, at least 51% of the stock in which is owned by one or more minority persons; and the management and daily business operations of which are controlled by one or more of the minority individuals who own it.

"**Woman owned business**" means a business concern which is at least 51% owned by one or more woman, or, in the case of a corporation, at least 51% of the stock in which is owned by one or more woman; and the management and daily business operations of which are controlled by one or more of the woman who own it.

"**Business owned by a person with a disability**" means a business concern that is at least 51% owned by one or more persons with a disability and the management and daily business operations of which are controlled by one or more of the persons with disabilities who own it. A not-for-profit agency for persons with disabilities that is exempt from taxation under Section 501 of the Internal Revenue Code of 1986 is also considered a "business owned by a person with a disability".

Appendix I

I. Definitions

Core Fixed Income: A fixed income portfolio which closely tracks the broad publicly traded fixed income market with a focus on current income generation and capital preservation. The most common benchmark for a Core Fixed Income portfolio is the Bloomberg US Aggregate Index. Common metrics such as yield, duration, etc. are typically held with within a tight range of the index.

Core Plus Fixed Income: A fixed income portfolio in which the majority of the portfolio tracks the broad publicly traded fixed income market, and a portion of the portfolio is allocated to higher risk sectors or securities which are not typically found in the broad fixed income market indices. Examples include, but are not limited to, Non-US Debt, Global Debt, Emerging Market Debt, High Yield, etc. The most common benchmark for a Core Plus Fixed Income portfolio is the Bloomberg US Aggregate Index.

Core Real Estate: Includes commercial and residential properties which derive their value primarily from current income production, and therefore represent lower-risk profiles than Non-core properties. Core investments are stabilized, substantially leased properties primarily in the four major property types:

1. Office: Mixed-use, multi-tenant, and single-tenant facilities, classified as either Central Business District (CBD) or suburban.
2. Retail: Regional malls, community and neighborhood shopping centers, specialty centers, and single-tenant stores.
3. Industrial: Bulk distribution, light manufacturing, and research and development (R&D) facilities.
4. Residential: High-rise, mid-rise, and garden apartments.

Co-Investment: Includes real estate and alternative investment opportunities offered at the General Partners' discretion and typically have a lower fee and carried interest expense. If a potential investment opportunity exhibits strong fundamentals and attractive returns but the main fund has a capacity constraint, the General Partner may offer current investors the opportunity to invest alongside the main fund.

Hedge Funds: A private, actively managed investment fund that seeks to provide returns to their investors by investing in a diverse range of markets, investment.

instruments and strategies. Most common strategies include: Long/Short Equity, Event Driven, Credit, Relative Value, Macro and Opportunistic.

Infrastructure: Refers to assets and services that a society requires to operate its economy including both economic assets and social assets. Economic infrastructure includes, but is not limited to roads, airports, regulated utilities, power generation and cell towers. Social infrastructure includes but is not limited to hospitals, schools, and waste management. Investments in infrastructure tend to have high barriers to entry, relatively stable and predictable cash flows often linked to inflation, long lifespans and low demand elasticity.

NCREIF Property Index (NPI): A quarterly time series composite total rate of return measure of investment performance of a very large pool of individual commercial real estate properties acquired in the private market for investment purposes only. All properties in the NPI have been acquired, at least in part, on behalf of tax-exempt institutions and held in a fiduciary environment.

NCREIF-ODCE: A capitalization-weighted, gross of fee, time-weighted return index with an inception date of December 31, 1977. The NFI-ODCE is composed of open-end commingled funds pursuing a core investment strategy. Index returns are calculated on a leveraged basis and are reported at the fund level.

Non-Core Real Estate: Investments represent a higher-risk profile than Core properties and have a higher return expectation. Non-core investments consist primarily of the following types:

1. Properties which are acquired primarily for high appreciation potential and are expected to derive their value primarily from appreciation returns.
2. Properties which would be Core except for an identifiable and correctable deficiency such as the need for lease-up, renovation, or conversion of an existing property, or the need for development adjacent to an existing owned property.
3. Properties outside defined Core property types, such as motels, hotels, medical office, student housing and raw land.

Opportunistic Fixed Income: A specific type of Non-Core Fixed Income portfolio which attempts to exploit the inefficiencies of one particular market or niche. Examples include, but are not limited to, Convertible Bonds, Mortgage Arbitrage, High Yield, Distressed, Emerging Market Debt, Private Debt, and Global Bank Loans. An opportunistic fixed income portfolio may also tactically allocate between various sectors of the fixed income market to generate alpha.

Private Credit: Refers to non-publicly traded debt financing to small and mid-sized companies including but not limited to asset-backed investments, direct lending, distressed investments, and specialty financing.

Private Equity: Refers to companies that are not quoted on the stock exchange. Investments are typically illiquid in nature. Ownership consists of limited partnership interest. Most common strategies include: Venture Capital, Growth Capital, Leveraged Buyouts, Distressed Investments, Special Situations and Mezzanine Capital.

Private Limited Partnerships: Include private markets fund structures which pool capital from investors in order to make equity or debt investments in real estate or alternative investments. These funds typically have a ten-year life span which consists of a two to three year investment period, a holding period where investments are actively managed and a liquidation period.

Public Real Assets: Refers to publicly traded equity and debt securities that exhibit inflation-hedging ability given their linkage to tangible assets and exposure to economic growth drivers, diversification benefits given their lower expected correlations to other asset classes, and income-generating potential given their focus on yield. Securities most common to this asset class include global real estate investment trusts (REIT), publicly listed infrastructure equity and debt securities, commodities, natural resource equities, Master Limited Partnerships (MLP), and U.S. Treasury inflation-protected securities (TIPS). Common benchmarks for each sub-sector include: FTSE EPRA/NAREIT Global index, S&P Global Infrastructure Index, S&P GSCI Index, S&P Global Natural Resources Index, Alerian MLP Index, and the Bloomberg U.S. TIPS Index, respectively.