



## Investment Policy Statement

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# INPRS Investment Policy Statement

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## Section 1 Definitions

1. **"Actuarial Required Rates of Return"** refers to the rate of return approved by the Board during the most recent asset-liability study.
2. **"Board"** refers to the board of trustees of the System established by IC 5-10.5-3-1.<sup>1</sup>
3. **"Chief Investment Officer"** or **"CIO"** means the System's acting chief investment officer.
4. **"Consultant(s)"** are third party persons or firms who are approved by the Board and are responsible for providing advice on the investment program based upon their expertise and their analysis of the issues under consideration.
5. **"Contractor(s)"** is an entity or individual that provides products and/or services to the System, Investment Staff or Board.
6. **"Custodian(s)"** is a bank or trust company which is retained by the Board to hold the assets of the System. A Custodian serves as an additional layer of risk control for the System by ensuring that any movement of funds is properly approved and documented.
7. **"Defined Benefit Retirement Funds"** refers to the accounts listed in Section 2 Introduction.
8. **"Defined Contribution Retirement Funds"** refers to the accounts listed in Section 2 Introduction.
9. **"ESG Commitment"** has the meaning set forth in IC 5-10.2-14-2.
10. **"Nonfinancial Investment Activity"** refers to any activity related to the investment or use of System's assets on the basis of non-financial factors associated with the achievement of public policy objectives or the advancement of third-party interests, for which the proponents of the activity have not produced demonstrable, objective, and specific empirical proof that the activity is consistent with any applicable fiduciary duty standards and the risk and return investment objectives of the System.
11. **"Executive Director"** or **"ED"** refers to the director of the System.<sup>2</sup>
12. **"Financial"** means a prudent determination by a fiduciary to have a material effect on the monetary risk or the monetary return of an investment. The term does not include an action taken or a factor considered by a fiduciary with the nonfinancial purpose to further social, political, or ideological interests as set forth in IC 5-10.2-14.2.
13. **"Investment Managers"** refers to an external person(s), firm, corporation, bank or insurance company who is retained to manage a portion of the assets of the System under specified guidelines. Such Investment Managers will be registered as investment advisors under the Investment Advisors Act of 1940 and Securities Exchange Commission Acts, unless exempted from registration by the SEC (e.g., banks and insurance companies and affiliates).
14. **"Investment Staff"** refers to the employees of the System responsible for performing investment activities who report to the CIO.
15. **"Legal Counsel"** refers to attorney(s) engaged to provide legal advice to the System.
16. **"Other Fund(s)"** refers to the System's assets that are not part of the Retirement Funds as listed in Section 2 Introduction.
17. **"Policy"** refers to the INPRS Investment Policy Statement, as amended from time to time.
18. **"Portfolio"** refers to the assets managed by an Investment Manager according to a specific mandate or strategy.
19. **"Retirement Fund(s)"** refers to the System's Defined Benefit Retirement Funds and Defined Contribution Retirement Funds.
20. **"Service Provider(s)"** means Investment Managers and proxy advisors to the System.<sup>3</sup>

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<sup>1</sup> IC 5-10.5-1-2

<sup>2</sup> IC 5-10.5-1-3

<sup>3</sup> IC 5-10.2-14-4

21. **“Staff”** refers to all employees of the System, including the ED and CIO.
22. **“System”** refers to the Indiana Public Retirement System established by IC 5-10.5-2-1.<sup>4</sup>
23. **“Target Rates of Return”** refers to the long-term net-of-fee rates of return targeted through the approval of an asset allocation during the asset-liability study.

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<sup>4</sup> IC 5-10.5-1-6

## Section 2 Introduction

The Indiana Public Retirement System (“INPRS” or the “System”) was statutorily established on July 1, 2011<sup>5</sup> and is responsible for the management and administration of Indiana’s public retirement funds and pensions systems<sup>6</sup> (i.e., “Funds”) including:

### Defined Benefit Retirement Funds

1. Public Employees’ Defined Benefit Account (PERF DB);
2. Teachers’ Pre-1996 Defined Benefit Account (TRF Pre-’96 DB);
3. Teachers’ 1996 Defined Benefit Account (TRF ’96 DB);
4. 1977 Police Officers’ and Firefighters’ Retirement Fund (’77 Fund);
5. Judges’ Retirement System (JRS);
6. Excise, Gaming and Conservation Officers’ Retirement Fund (EG&C);
7. Prosecuting Attorneys’ Retirement Fund (PARF);
8. Legislators’ Defined Benefit Fund (LE DB);

### Defined Contribution Retirement Funds

9. Public Employees’ Defined Contribution Account (PERF DC);
10. Teachers’ Defined Contribution Account (TRF DC);
11. Legislators’ Defined Contribution Account (LE DC);
12. My Choice: Retirement Savings Plan for Public Employees (PERF MC DC);
13. My Choice: Retirement Savings Plan for Teachers (TRF MC DC);

### Other Funds

14. Special Death Benefit Fund (SDBF);
15. Local Public Safety Pension Relief Fund (LPSPR);
16. Retiree Medical Benefits Account Plan (RMBA)

Prior to July 1, 2011, the retirement plans for Indiana public employees were administered by two separate boards of trustees, the Public Employees Retirement Fund Board and the Indiana State Teachers’ Retirement Fund Board.

## 2.1 System Oversight

Oversight of the System’s assets is the responsibility of the INPRS Board of Trustees (“Board”). The Board is supported by the Executive Director (“ED”), Chief Investment Officer (“CIO”) and internal investment and legal staff (“Staff”) and externally by investment consultants (“Consultants”), Investment Managers, Custodian(s), Legal Counsel and all others fulfilling fiduciary duties.

## 2.2 Authority for Investment Policy Statement

Indiana law permits the Board to establish investment guidelines and limits on all types of investments and take other actions necessary to fulfill its duty as a fiduciary for all assets under its control.<sup>7</sup>

<sup>5</sup> IC 5-10.5-2-1

<sup>6</sup> IC 5-10.5-3. The Board has the powers, duties, restrictions, limitations, and penalties in connection with the board's investment and management of the assets of the Retirement Funds of the System under the following provisions: (1) IC 5-10.2-2-2.5; (2) IC 5-10.2-2-13; (3) IC 5-10.3-3-7.1; (4) IC 5-10.3-5-3; (5) IC 5- 10.3-5-3.1; (6) IC 5-10.3-5-4; (7) IC 5-10.3-5-5; (8) IC 5-10.3-5-6; (9) IC 5-10.4-3-7; (10) IC 5-10.4-3-9; (11) IC 5- 10.4-3-10; (12) IC 5-10.4-3-11; (13) IC 5-10.4-3-12; (14) IC 5-10.4-3-13; (15) IC 5-10.4-3-14; (16) IC 5-10.4-3-15; (17) IC 5-10.4-3-16; (18) 35 IAC 1.2-1-3.

<sup>7</sup> IC 5-10.2-2-2.5(a)

### 2.3 Fiduciary Standard

The Board is required by law<sup>8</sup> to discharge its duties solely in the financial interest of the participants and beneficiaries of the System for the exclusive purposes of:

- (1) providing financial benefits to participants and beneficiaries; and
- (2) defraying reasonable expenses of administering the System.

The Board shall invest the System's assets with the care, skill, prudence, and diligence 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 with the primary purpose of maximizing the target rate of return on its investments. In doing so, the Board must operate with a duty of undivided loyalty and must be impartial in the exercise of such duty to the members of each Fund. The Board is also required to diversify such investments in accordance with prudent investment standards.<sup>9</sup>

### 2.4 Scope of Investment Policy Statement

This Policy is binding on all persons with authority over the System's assets, including the Board, Service Providers, Custodians, Consultants, Staff, as well as any other person who has a fiduciary relationship with the System.

This Policy is divided into multiple sections and each section is applicable to the System, or to specific Retirement Funds or Other Funds if stated otherwise. The Policy also includes multiple Addendums, which are an integral part of this Policy and are incorporated into the Policy by reference.

### 2.5 Compliance with the Law

The Board, Staff, Contractors, and Service Providers are required to comply with all applicable federal and state laws, rules and regulations. This Policy attempts to describe the applicable laws and specifically identifies such laws in the endnotes. However, in the event of any conflict between the law and this Policy, the law prevails, and each fiduciary to the System is ultimately responsible for interpretation and compliance with laws.

### 2.6 Contact

Questions and comments relating to the application or interpretation of this Policy and any written notice required to be delivered should be directed to:

Indiana Public Retirement System  
Attn: Chief Investment Officer  
One North Capitol Avenue, Suite 001  
Indianapolis, IN 46204

If notice is required to Compliance Officer, please deliver notice to:

Indiana Public Retirement System  
Attn: Chief Legal and Compliance Officer  
One North Capitol Avenue, Suite 001  
Indianapolis, IN 46204

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<sup>8</sup> IC 5-10.2-14-9

<sup>9</sup> IC 5-10.3-5-3 and IC 5-10.4-3-10(a)

If notice required to Internal Audit, please deliver notice to:

Indiana Public Retirement System  
Attn: Director of Internal Audit  
One North Capitol Avenue, Suite 001  
Indianapolis, IN 46204

### Section 3 Objectives and Purpose of Policy

All aspects of this Policy shall be interpreted in a manner consistent with the System's objectives. The primary objective of the System is to maintain adequate funding for the Defined Benefit Retirement Funds and Other Funds to provide for the payment of such Funds' liabilities over time in a cost-effective manner.

The purpose of this Policy is to support this general objective by:

1. Setting forth the investment policies which the Board judges to be appropriate and prudent, in consideration of the needs and legal requirements applicable to direct investment of the assets;
2. Making a clear distinction between the roles and responsibilities of the Board, Staff, and each Contractor and Service Provider;
3. Establishing formalized criteria to measure, monitor and evaluate the performance results of the Investment Managers;
4. Communicating the investment policies, objectives, guidelines, and performance criteria of the Board to the Staff, Investment Managers, Consultants, Contractors, other Service Providers, Employers, Members and all other interested parties; and
5. Serving as the guide relative to the ongoing oversight of the investments by the System and demonstrating that the Board is fulfilling its fiduciary responsibilities in the administration and management of each Retirement Fund's and Other Fund's assets solely in the interests of such Fund's members and beneficiaries.

The Board intends for this Policy to be a dynamic document, and, as such, expects to conduct periodic reviews utilizing input from Staff, Consultants and other knowledgeable parties. The Board anticipates approving changes from time to time to reflect changes in any or all of: economic and market conditions, investment opportunities, the System's investment strategy, benefit provisions, and the System's governance. This Policy shall be reviewed on a regular basis and, at minimum, upon completion of an asset liability study.



## **Section 4 Guiding Beliefs**

The mission of the System, as fiduciaries, is to educate stakeholders, collect necessary contributions, and prudently manage member assets to deliver promised defined benefit and defined contribution benefits and services. Its vision is to create engaged members able to realize their retirement dreams. To that end, the Board has adopted a set of guiding beliefs for oversight and management of System assets. The guiding beliefs are as follows:

### **4.1 Time Horizon**

Given the Defined Benefit Retirement Funds' intent to provide retirement security for current and future members and beneficiaries, long-term is defined as greater than ten years.

### **4.2 Target Rates of Return**

The Board shall set Target Rates of Return for the Defined Benefit Retirement Fund based on input from the System's Actuaries, CIO, Staff, and Consultant.

### **4.3 Asset Allocation**

The asset allocation is the most important determinant of long-term investment results. The CIO and Consultant shall recommend, for Board approval, asset allocation strategies that are expected to meet the Defined Benefit Retirement Funds' Target Rates of Return net of fees, while minimizing risk. Within each asset class, the CIO and Investment Staff, at their discretion, may establish sub-asset classes to better match the risk profile of the Board-approved asset allocation.

### **4.4 Investment Risk**

Exposure to investment risk is necessary to achieve the System's performance objectives. The Funds should be structured in a way that harvests risk premiums associated with different investments while recognizing that markets exhibit volatility that may cause short-term divergence from expectations.

### **4.5 Peer Risk**

Asset allocation and investment decisions will be made according to the System's unique objectives and constraints, recognizing our actual member outcomes are more important than perceived investment difference between INPRS and our peers.

### **4.6 Preservation of Capital**

It is important to limit the loss of capital during challenging market environments, as significant losses can reduce the probability of achieving performance objectives.

### **4.7 Diversification**

True diversification goes beyond simple capital allocation. Diversifying across investment risk factors is imperative to achieving a high risk-adjusted rate of returns over long time horizons.

### **4.8 Liquidity**

The investment strategies employed for the Defined Benefit Retirement Funds shall consider liquidity needs to fund withdrawals for benefit payments, fees and expenses, and other obligations. Provided there are sufficient monies available to meet cash outflows, the Defined Benefit Retirement Funds can take advantage of superior risk-adjusted returns provided by prudent investments in illiquid securities.

**4.9 Rebalancing**

Systematic rebalancing should be used to control risk and ensure that Defined Benefit Retirement Funds assets continue to reflect the strategic asset allocation over long horizons and through periods of market volatility. However, the CIO shall have the ability to make tactical shifts within the asset allocation to increase risk-adjusted returns as long as such changes are within Board-approved asset allocation ranges.

**4.10 Active Management**

Active management can and should be used opportunistically if there is conviction that the opportunity set can produce a net of fee return that is greater than a passive investment in an index.

**4.11 Asset Management**

Investment of System assets will be delegated to Investment Managers, except in situations where the Board has determined that the CIO and Investment Staff have demonstrated the expertise and ability to achieve specific investment objectives internally at a better overall value to the applicable Fund. Investment Managers should employ clearly defined investment strategies and demonstrate a sustainable competitive edge relative to their peers.

## Section 5 Responsible Parties and Their Duties

### 5.1 Prudent Investors

All Service Providers will maintain a prudent investor profile, consistent with the applicable fiduciary responsibility to invest the assets solely in the interests of the System's members and beneficiaries.

### 5.2 Code of Ethics

All Contractors and Service Providers shall abide by all ethical requirements that apply to persons who have a relationship with the System as set forth in Indiana law<sup>10</sup> or the Board of Governance Manual. If a Contractor or Service Provider or its agents violate any applicable ethical standards, the System may, in its sole discretion, terminate its agreement immediately upon notice to the Contractor or Service Provider. In addition, the Contractor or Service Provider may be subject to penalties under Indiana law.

All parties are compelled to promptly report any acts that create a conflict of interest or could be construed as a violation of Indiana law or the Board of Governance Manual. Such report shall be in writing to the System's Compliance Officer, CIO, or ED. If the issue in question involves the System's Compliance Officer, CIO, or ED, then the Contractor or Service Provider may use an alternative method such as reporting the violation directly to the System's Director of Internal Audit. The obligation under this section extends only to those facts that the Contractor or Service Provider knows or reasonably could know.

The Board recognizes that Contractors and Service Providers have every right as citizens to participate in the political process both individually or corporately. However, the Board believes that it is inappropriate and improper for members of the Board to solicit contributions or support of specific candidates from any Contractor or Service Provider or member of Staff. Any such incidents should be reported, in writing, by the Contractor or Service Provider to the Compliance Officer or ED.

### 5.3 Delegated Authority

The Board has delegated the day-to-day investment operations to the Staff, though oversight of the System's assets remains with the Board. The Staff is responsible for performing such duties consistent with this Policy and as otherwise directed by the Board. Included in this, the ED is authorized by the Board, pursuant to a recommendation by the CIO, to retain, manage, and terminate Investment Managers within each asset class as required to achieve the investment objectives of the Retirement Funds within the following limitations:

1. The initial investment made in a Portfolio described in Section 9 (Public Investment Guidelines), and Section 13 (Risk Parity Investment Guidelines), may not exceed 3.0% of the market value of the System's assets at the time of investment. Notification regarding the investment should be provided to the Board at its next regularly scheduled meeting. Any additional allocations to the same Portfolio that increase the Portfolio's total market value to a weight greater than 6.0% of the System's assets at the time of investment must receive prior authorization from the Board. In the event a Portfolio's total market value organically grows via performance above the 6% threshold, the Board shall be notified at the following meeting;
2. The initial investment made in a Portfolio described in Section 10 (Private Markets Investment Guidelines), Section 11 (Real Assets Investment Guidelines), and Section 12 (Absolute Return

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<sup>10</sup> See Section 2.5

Investment Guidelines), may not exceed 0.75% of the market value of the System's assets at the time of investment. Notification regarding the investment should be provided to the Board at its next regularly scheduled meeting. Any additional allocations to the same Portfolio that increase the Portfolio's total market value to a weight greater than 1.5% of the System's assets at the time of investment must receive prior authorization from the Board;

3. Reducing assets under management, including full termination of a Portfolio, may not exceed 4.0% of the market value of the System's assets. Notification regarding the termination should be provided to the Board at its next regularly scheduled meeting. A Portfolio, however, may be terminated with the agreement of the ED and CIO for any level of assets if such removal is deemed necessary to protect the System's assets.

An Investment Manager change may only exceed the limits described in this section with the prior authorization of the Board. If an investment opportunity requires more immediate action and requires prior approval by the Board, the Board recognizes that the ED and CIO may request that the full Board convene between regularly scheduled meetings, via conference call, to review and approve the investment.

Approval authority set forth in this Policy shall be reviewed upon the departure of either the ED or CIO, to consider the suitability of this investment authority delegated by the Board.

In addition to the responsibilities outlined above, the following parties also have separate responsibilities and duties to the System.

#### **5.3.1 Board of Trustees**

1. Approve the overall mission, strategic plan, and objectives of the System;
2. Adopt an Investment Policy Statement, including an asset allocation according to prudent investor standards;
3. Meet the fiduciary standards described in Section 2.3;
4. Approve and review the engagement of Contractors and Service Providers;
5. Evaluate the System's performance and compliance with this Policy and applicable state and federal laws;
6. Evaluate performance of the Executive Director and Consultant; and
7. Delegate any permitted responsibilities or duties to the Staff.

#### **5.3.2 Executive Director**

1. Supervise the investment operations by ensuring that the CIO and Investment Staff invest assets in accordance with the Board's policies and internal controls that are in place to safeguard the System's assets;
2. Expend money, including income from the assets, for effectuating the System's purposes;
3. Provide regular reports to the Board;
4. Negotiate and execute all contracts, agreements and memorandums of understanding in accordance with the System's Procurement Policy and this Policy;
5. With the advice and counsel of the CIO and Consultant, take prudent actions that are deemed essential to protect the assets of the System with any emergency actions taken being promptly notified to the Board; and
6. Perform and/or delegate all additional duties assigned by the Board.

**5.3.3 Chief Investment Officer**

1. Monitor and manage the investment operations of the System to ensure compliance with Board policies;
2. Regularly provide updates and recommend modifications to this Policy to the Board;
3. Assist Board in establishing appropriate asset allocation targets and ranges;
4. Implement agreements and disburse funds to the selected Investment Managers at prudent and approved commitment levels;
5. Advise the Board and ED on investment matters;
6. Keep the Board and ED apprised of situations which merit their attention; and
7. Supervise and/or delegate to the Investment Staff.

**5.3.4 Investment Staff**

1. Regularly provide updates and recommend modifications to this Policy;
2. Source and evaluate prospective Portfolios for the System;
3. Monitor and review Investment Managers for adherence to strategies, objectives and guidelines; and
4. Regularly evaluate and advise the Board on the performance of the Consultants.

**5.3.5 Consultants**

1. Regularly review and advise the Board and Staff on investment policies related to the System;
2. Assist Board and Staff in establishing appropriate asset allocation targets and ranges;
3. Provide the Board and Staff with relevant, reliable and timely research and information requests to fulfill their responsibilities;
4. Assist Staff in conducting Investment Manager and/or Portfolio due diligence and in negotiating business terms and appropriate structural incentives;
5. Monitor and review Investment Managers on an ongoing basis, for adherence to objectives and guidelines and, if appropriate, recommend any changes to the Board and Staff; and
6. Provide a third-party perspective and oversight to the System's assets.

## Section 6 Asset Allocation

The asset allocation of the Defined Benefit Retirement Fund is expected to meet the Target Rates of Return over a long period of time while minimizing risk. The Board will evaluate the asset allocation periodically, after reviewing considerations and recommendations from the CIO and Consultant, and conduct a formal asset liability study no less frequently than every five years.

### 6.1 Formal Asset-Liability Study

To guide their selection of the optimal target allocation and target range for each asset class, the Board shall consider the following key factors:

1. Maximize the probability of achieving the target rate of return over a 30-year time horizon while limiting the probability of contribution increases and a decline in funded status;
2. Investment decisions will be made and evaluated on a risk-adjusted basis after all associated costs are taken into account;
3. Constraints including, but not limited to, liquidity and operational complexity will be considered when making investment decisions.

In developing an asset allocation that conforms to the Defined Benefit Retirement Funds' objectives, the Board shall consider the following key factors:

1. Expected long-term return, risk, correlations, liquidity constraints, and transaction costs of various global public and private asset classes;
2. Key risks affecting Defined Benefit Retirement Funds assets, such as equity risk, credit risk, interest rate risk, and inflation risk;
3. Projected cash flow and liquidity needs of the Defined Benefit Retirement Funds;
4. Projected liabilities of the Defined Benefit Retirement Funds;
5. Projected funded status of the Defined Benefit Retirement Funds; and
6. Contribution needs of the Defined Benefit Retirement Funds.

### 6.2 Strategic Asset Allocation

The following asset classes, target allocations, and allowable ranges were approved by the Board on May 7, 2021 based on a formal asset-liability study and shall remain in place until revised by the Board.

Table 6.2

Global Asset Classes	Target Allocation	Target Range
Public Equity	20.0%	17.0% to 23.0%
Private Markets	15.0%	10.0% to 20.0%
Fixed Income – Ex Inflation-Linked	20.0%	17.0% to 23.0%
Fixed Income – Inflation-Linked	15.0%	12.0% to 18.0%
Commodities	10.0%	7.0% to 13.0%
Real Assets	10.0%	5.0% to 15.0%
Absolute Return	5.0%	0.0% to 10.0%
Risk Parity	20.0%	15.0% to 25.0%
<b>Total Exposure</b>	<b>115%</b>	<b>Max = 120%</b>

## **Section 7 Retirement Funds' Performance Evaluation**

### **7.1 Introduction**

The Board recognizes the need to evaluate the investment performance of the CIO and Investment Staff who have been delegated the duty to invest the Defined Benefit Retirement Funds' assets, and further recognizes that the CIO and Investment Staff are under a fiduciary duty to the Defined Benefit Retirement Fund.

### **7.2 Benchmarks**

1. The Investment Staff uses a variety of benchmarks to evaluate the risk and return of the total Defined Benefit Retirement Funds, asset classes, and managers.
  - a. Custom total plan benchmarks are established to describe the Defined Benefit Retirement Funds' asset allocation, described in table 6.2.
  - b. Custom asset class benchmarks are established to represent the qualities of INPRS's global asset classes, described in table 6.2.
  - c. Standard benchmarks are used to represent the opportunity set of certain managers.
2. The returns of these benchmarks are provided to the Board to aid them in evaluating the performance of the total plan and constituent asset classes.
3. The benchmarks employed and the methodology used are described in a separate document, "Understanding INPRS's Investment Benchmarks." Changes made to the custom total plan benchmarks or global asset class benchmarks will be communicated to the Board at the next regularly scheduled Board meeting.

### **7.3 Performance Evaluation Factors**

The key factors to be used in the evaluation of the investment performance of the Defined Benefit Retirement Funds include:

1. Net of fees, five-year and ten-year rolling annual rate of return equal to the target rate of return for the Defined Benefit Retirement Funds.
2. Net of fees, three-year and five-year Sharpe Ratio of the Defined Benefit Retirement Funds, no less than a weighted average of benchmark indices' Sharpe Ratio which best describe the Retirement Funds' asset allocation.
3. Net of fees, three-year and five-year rolling investment rate of return of the Defined Benefit Retirement Funds, no less than a weighted average of benchmark indices which best describe the Defined Benefit Retirement Funds' asset allocation.

## Section 8 Risk Management

The Board believes that a central focus of investing is to control risks that may reduce the probability of achieving the Target Rates of Return. The Board sets the framework for risk management through this Policy, and within it, identifies three critical parts:

1. Risk Measurement
2. Risk Monitoring
3. Risk-Adjusted Investment Management

### 8.1 Risk Measurement

The Board has developed a broad set of managerial, advisory, and consulting relationships which provide a flow of information that enables the CIO and Investment Staff to effectively analyze market conditions, research investment opportunities, monitor Investment Managers, and manage the System's assets. The CIO and Investment Staff are responsible for selecting, maintaining, and enhancing the risk management tools used to provide analysis that inform and support the investment process of the System and report on the System's investment risks and associated returns to the Board as appropriate.

### 8.2 Risk Monitoring

The Board believes that when building the most diversified investment portfolio it is critical to think in terms of risk allocation, not capital allocation. Risk allocation should be based on a fundamental understanding of the relationship between asset classes and economic environments. As a result, the Board, CIO, and Investment Staff will regularly monitor the Systems' success in achieving the targeted risk diversification that is inherent in the approved asset allocation stated in Section 6 (Asset Allocation). The following list is a sample set of portfolio risk exposures that will be monitored on an absolute and relative basis; this list is not intended to be exhaustive.

Table 8.2.1

Market Risk Factors
Equity Risk
Nominal Interest Rate Risk
Credit Risk
Inflation Risk
Currency Risk

The Board recognizes that there are several other risks that naturally exist in a global investment portfolio. As a result, the Board, CIO, and Investment Staff will regularly monitor the performance and composition of the System's assets and make favorable adjustments that seek to improve overall risk-adjusted performance. The following table contains a sample set of strategic risk factors that will be monitored on an absolute and relative basis; this list is not intended to be exhaustive.



Table 8.2.2

Strategic Risk Factors	Descriptions
Issuer Risk	Direct exposure to specific entity or company
Country Risk	Direct exposure to specific countries and currencies
Geographical Risk	Exposure to regions of the U.S. or countries outside the U.S.
Credit (Quality) Risk	Segmentation of investments by credit rating
Counterparty Risk	Risk of a counterparty default
Debt Refinancing Risk	Measured by the concentration of debt maturities by year
Liquidity Risk	Risk associated with an inability to buy or sell an investment due to contractual commitments, high transaction costs, or the time required to find a seller or buyer
Sector Risk	Risk that many of the investments in one sector fall in price at the same time due to an industry-wide event
Vintage Year Risk	Risk of an investment vintage year occurring at the peak or bottom of a market cycle
Business Risk	Overexposure to a specific Investment Manager or Investment Manager's style

### 8.2.1 Investment Manager Concentration Limit

The Board recognizes that allocating a large percentage of assets to a single Investment Manager may introduce increased business or liquidity risk to the System. Consistent with the long-term goal of enhancing return while reducing risk, the Board has placed an upper limit on the concentration of assets placed with an Investment Manager.

No Investment Manager shall manage more than 15% of the System's assets in actively managed Portfolios.

No Investment Manager shall manage more than 20% of the System's assets in passively managed Portfolios.

No Investment Manager shall manage more than 25% of the System's assets in a combination of actively and passively managed Portfolios.

### 8.2.2 Foreign-Exchange Risk Management

The objective of this foreign-exchange ("F/X") risk management policy is to effectively manage the System's performance volatility associated with foreign currency risk. F/X risk is the possibility of a negative currency return because of adverse movements in foreign exchange rates. The CIO, with the advice and counsel of the Consultant, is charged with assessing the F/X impact on the System's assets based on overall exposure and the resulting impact on incremental risk and return.

Unless otherwise approved by the Board, it is the policy of the Board that management of F/X exposure may be only implemented (1) by an Investment Manager on its Portfolio when the Investment Manager possesses recognized F/X experience or (2) by an overlay manager or other third-party expert ("F/X Overlay Manager") for a specific Portfolio or the System. Any recommended hedging strategy that will be implemented by an F/X Overlay Manager will be presented to the Board for approval and incorporated into the appropriate benchmark. The management and implementation of Board-approved F/X hedging activities will be implemented by the CIO, with the advice of the ED and the Consultant.

### 8.2.3 Leverage

The System is authorized to use leverage for the purpose of improving investment portfolio efficiency in terms of return for a given level of risk and improving portfolio diversification versus alternative choices that do not use leverage.

For purposes of this section of the IPS, leverage is defined as that which is reflected on INPRS's balance sheet and approved by the Board through the Strategic Asset Allocation targets and ranges outlined in Section 6.2. This leverage is implemented using derivatives designed to gain exposure to an asset class where the notional value of the derivatives is not fully collateralized by cash equivalents and a loss of more than 100% of the original capital invested is possible. The maximum permissible amount of leverage in the Defined Benefit Retirement Funds is 120%. If at any time explicit leverage is above 120%, Investment Staff will reduce explicit leverage to a level below 120% within a reasonable timeframe.

Leverage using derivatives is incurred when the underlying collateral is invested in assets that are not as liquid as cash equivalents, introducing additional liquidity risk to the System. This risk is managed by monitoring the level of liquidity required in various market scenarios and ensuring that an adequate quantity of cash equivalents is available to meet commitments in times of market stress.

Staff is responsible for monitoring and managing the amount of leverage incurred by the System and providing for the necessary liquidity to satisfy margin requirements. Leverage exposure will be reported quarterly to the Board, or more frequently if conditions warrant.

The System is authorized to allow the following prudent uses of leverage by Investment Managers who possess recognized expertise with the allowed tools as follows:

1. Strategies that use derivatives in accordance with the asset allocation and risk parameters of this Policy;
2. Short sales in accordance with this Policy;
3. Foreign currency hedging in accordance with this Policy;
4. Embedded leverage within the System's limited partnership and limited liability company investments; and
5. Collateralized funding operations including securities lending, repurchase, and reverse repurchase agreements.

### 8.2.4 Operations Risk Management

1. Procedures: A procedures manual shall be maintained by the Investment Staff that provides detailed steps on how to complete the essential tasks of the investment department.
2. Custodial Bank: The Investment Staff shall conduct on-site due diligence to review the operational controls set in place by all custodial banks. The Investment Staff will also consider the extent of remedies provided by the Custodian and its overall ability to fulfill its commitments should operational failures occur.
3. Investment Managers: The Investment Staff shall regularly conduct on-site due diligence to review the operational controls and investment activities conducted by all Investment Managers. The Investment Staff will also regularly monitor each Investment Manager and its portfolio through periodic update calls.

### 8.2.5 Legal Risk Management

The Staff will exercise diligence to ensure that all contracts are legally binding and enforceable in a suitable venue. When appropriate, the Staff will seek the advice the System's legal department and shall bring all investment agreements for review prior to execution of such agreements.

### 8.2.6 Statement on ESG and Other Non-Financial Factors

1. The System manages its assets to provide retirement income to hundreds of thousands of workers, retirees, and their beneficiaries. The members and their families rely on the System to invest these assets for their exclusive benefit. The System follows fiduciary principles as established in statutes, by the industry, and consistent with this Policy to achieve the risk and return objectives of the System.
2. Divergent positions on matters of public policy are best resolved by officials who can be held accountable through the democratic process by their constituencies.
  - a. INPRS expresses no judgment of any kind about the worthiness or desirability of any particular public policy objectives or of any other non-financial public policy objectives that might be pursued through the use of System assets.
  - b. Further, federal and state governments have intelligence, military, diplomatic and financial regulatory resources that are best positioned to identify, monitor, and report on those who engage in activities that conflict with U.S. national security and humanitarian policies, and to impose the appropriate sanctions. As such, the System should defer to the guidance of the responsible government actors on those matters.
  - c. The System will exercise diligence to ensure that all investments comply with applicable law, including restrictions on ESG Commitments.<sup>11,12</sup>
3. The investment of System assets, or the use of rights or powers appurtenant to System assets, is not an appropriate or legally permissible instrument for the achievement of public policy objectives.<sup>13</sup> Service Providers contracted by the System that would engage in Nonfinancial Investment Activities<sup>14</sup> derived in whole or in part from the power associated with the System's assets, may be perceived as elevating others' interests above those of the System. Such activities would introduce non-quantifiable risk into the investment of System assets potentially inconsistent with fiduciary obligations.
  - a. Both Investment Staff and Service Providers contracted by the System are prohibited from Nonfinancial Investment Activities<sup>15</sup> with respect to System assets, including without limitation in the selection of investments, selection of Investment Managers, management or oversight of investments, proxy voting, or shareholder engagement. Actions of the Investment Managers, including the voting of proxies consistent with Addendum 7 of this Policy, must be consistent with these responsibilities.
  - b. The Board and Investment Staff may not make an investment decision with the purpose of either influencing any social or environmental policy or attempting to influence the governance of any corporation for nonpecuniary purposes. Investment Staff must objectively evaluate the applicable risk and return characteristics of each investment. No weight will be given to public policy and other third-party interests. Investment Staff shall only evaluate or consider contributing and detracting financial factors to ensure assets are invested in the best economic interest of the System.
4. Nothing in the above paragraphs (or in any other provisions of this Policy) shall be construed to authorize or require any conduct in violation of applicable law.

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<sup>11</sup> See Section 2.5

<sup>12</sup> See Section 1.9

<sup>13</sup> IC 5-10.2-2-1.5

<sup>14</sup> See Section 1.10

<sup>15</sup> See Section 1.10

### **8.3 Risk-Adjusted Investment Management**

Given the volatility and complexity of global markets, the Board believes that timely implementation of risk management efforts is of paramount importance to maintaining an optimal portfolio. As a result, the CIO and Investment Staff will regularly review the risk parameters to maintain the risk profile implied by the Board approved asset allocation.

#### **8.3.1 Rebalancing**

The CIO and Investment Staff will be charged with monitoring individual asset classes and rebalancing as necessary to keep the Defined Benefit Retirement Funds within the Board-approved asset allocation ranges. Excluding Private Markets, Real Assets, and Absolute Return, asset classes beyond the target range shall be rebalanced back to the midpoint between the target allocation and outer edge of the target range. However, the CIO and Investment Staff shall have the ability to make tactical shifts in portfolio allocations as deemed appropriate to increase risk-adjusted portfolio returns as long as movements are within Board-approved asset allocation ranges.

Given the illiquid nature of Private Markets, Real Assets, and Absolute Return investments, any allocation to these asset classes that extends beyond the target ranges will not require a rebalance. Instead, the CIO will be required to update the Board at the next meeting on the investment pacing plan and projected allocation going forward for the asset class that is beyond the target range.

#### **8.3.2 Active Risk**

Active risk refers to the potential for portfolio returns to be less than or greater than benchmark returns. It arises from differences in asset class weights between portfolio and benchmark as well as active management decisions made by Investment Managers. Active risk is commonly referred to as tracking error. The CIO and Investment Staff will monitor active risk and report any material changes to the Board.

## Section 9 Public Investment Guidelines

### 9.1 General Guidelines

Each Investment Manager retained to manage a portion of the System's assets that reside within the Public Equity, Fixed Income (excluding private credit strategies), or Commodities asset class ("Public Investment Manager") shall be aware of and operate within this Policy and applicable law. Subject to the guidelines in this Policy and its contract with the System, any Public Investment Manager retained by the System is to have full discretionary investment authority over its Portfolio.

Public Investment Managers shall observe the following rules:

1. Specific Limitation on Holdings: The purchase of securities of any one issuer (except for the US Government and its agencies) shall be limited to an initial cost of 10% or two times the benchmark weight of the market value of the Portfolio, whichever is greater. Through capital appreciation and additional purchases, no such holding should exceed 15% of the market value of the total holdings of the Portfolio, unless the CIO approves an exception.
2. Securities Trading: Each Public Investment Manager is to immediately send copies of each transaction record to the System's Custodian(s), and any designated agent of its Custodian(s). Each Public Investment Manager is further required to reconcile the account(s) under its management on a timely basis each month with the Custodian(s). Each Public Investment Manager is responsible for complying fully with the System's policies for securities trading and selecting brokerage firms as stated in Addendum 3 (Trading and Brokerage Policy). Certain open-ended and closed-ended drawdown funds should report activities in line with reporting requirements in Section 9.2.1, subject to investment staff discretion.
3. Acknowledgments of Registration: Each Public Investment Manager retained by the System must be a person, firm, or corporation registered as an investment adviser under the Investment Advisors Act of 1940; a bank as defined in such Act; or an insurance company qualified to do business in more than one state and must acknowledge its fiduciary responsibility in writing. SEC-registered firms must provide the Investment Staff a copy of its Form ADV Part 2 on an annual basis.
4. Acknowledgments of Compliance: All Public Investment Managers shall confirm at least annually that they have complied with this Policy and acknowledge in writing their receipt of this Policy, any updated versions of this Policy, and their agreement to abide by the terms. All Public Investment Managers shall have an affirmative duty to bring suggestions for modification or change of this Policy to the Staff.
5. Insurance Requirements: Each Public Investment Manager will obtain insurance coverage in an appropriate amount as customary in the industry. The insurance coverage must cover losses resulting from a breach of fiduciary duty in providing or failing to provide professional services to the System, losses due to a mistaken or negligent act or omission, and losses resulting from acts of dishonesty and theft. Each Public Investment Manager shall annually provide written evidence of such coverage.
6. Conflicts of Interest: A Public Investment Manager through its actions on behalf of the System, shall not invest any part of its Portfolio with itself or with any person or entity with which or in which it has any economic interest, unless such Public Investment Manager receives prior written approval from either the CIO or ED or with the exception of passive index funds where

the Public Investment Manager is a constituent of the index. This does not preclude Public Investment Managers from investing personal assets alongside System assets in a manner that is not in conflict with their fiduciary obligation to the System. This limitation shall be construed to avoid any possibility of self-dealing or conflict of interest.

In addition, no Public Investment Manager, through its actions on behalf of the System, shall act or receive compensation as a broker, dealer, underwriter, or principal whether directly or through a related or an affiliated entity, unless such Public Investment Manager receives prior written approval from the CIO or ED.

7. Commingled and Pooled Investments: In accordance with Indiana law<sup>16</sup>, Public Investment Managers may, with the express written permission of the CIO, invest in commingled or pooled funds that otherwise comply with the guidelines in this Policy.
8. Ethics Policy: Public Investment Managers shall provide a copy of their respective ethics policy to the System.
9. Correction of Violations: In the event a violation of the guidelines in this Section occurs, unless otherwise approved by the CIO or ED in writing, based upon a determination of the best interests of the System, the violation:
  - a. Shall be corrected as soon as practicable following detection and notification, unless the CIO or ED has agreed in writing to a correction which does not require immediate action;
  - b. Shall result in reimbursement to the System by the Public Investment Manager for any losses which may have been incurred due to the violation;
  - c. Shall result in the System retaining any gains which are realized from the violation; and
  - d. May be grounds for termination.
10. Prohibited Securities and Transactions: The System is prohibited from engaging in any transaction that would be a “prohibited transaction” under the Internal Revenue Code Section 503 or be prohibited under Indiana law. The following transactions shall be prohibited unless otherwise approved by the CIO or ED in writing:
  - a. Purchases of letter or restricted securities; and
  - b. Direct purchases of physical commodities (Swaps and instruments that constitute a security, or authorized derivatives are permitted).
  - c. Securities identified as prohibited securities under the Indiana Sudan and Terror legislation (IC 5-10.2-9 Chapter 9. Sudan Divestment; IC 5-10.2-10 Chapter 10. Divestment from States the Sponsor Terror).
  - d. Divestment related to Boycott, Divestment From, or Sanctions of Israel Act (IC 5-10.2-11).
  - e. Securities identified as prohibited securities under the Divestment From Chinese Companies legislation (IC 5-10.2-13).
11. Proxy Voting & Shareholder Engagement. The voting of shares and the right to engage with a public company issuer as a shareholder are important rights of public equity ownership, and the exercise of such rights must be carried out in accordance with the fiduciary standards set forth above. Such voting and engagement are uses use of System assets and must comply with the

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<sup>16</sup> IC 5-10.2-2-2.5(b)

prohibition against the use of System assets for any purpose other than financial benefit to the System's participants and beneficiaries. Public Investment Managers must therefore disclose to the Board their proxy voting, shareholder engagement and ESG-related policies, including reporting as further described in Addendum 7 hereto.

Public Investment Managers within the Commodities asset class shall observe the following rules, in addition to those stated above:

1. Permissible Investment Types: Investments may include listed securities that have a high correlation to the Index, overlay exposures, and collateral investments, including but not limited to: futures contracts, forward contracts, swap agreements, structured notes, and options. Commodities Investment Managers may hold individual positions long, short, or a combination of both. The Commodities Program will be implemented through a combination of passive and active management in both liquid and illiquid structures.
2. Listing Requirements: Exchange-traded commodity futures, options, and other instruments may be traded on any exchange regulated by the Commodities Futures Trading Commission ("CFTC") of the United States and/or the Financial Services Authority ("FSA") of the United Kingdom.

For non-exchange traded derivatives, counterparty creditworthiness shall be at a minimum of "A3" as defined by Moody's Investor Service, "A-" by Standard & Poor's, and/or "A-" by Fitch. The use of unrated counterparties is prohibited unless such counterparty is a wholly-owned affiliate of a parent organization that guarantees payment and meets the above-noted counterparty creditworthiness standards.

3. Risk Controls: Derivative instruments may be standardized and exchange-traded (e.g., futures) and/or privately-negotiated and over-the-counter (e.g., swap agreements). Underlying risk exposures may be to cash commodities and/or commodity derivatives. Risk exposures for exchange-traded instruments shall lie with exchange clearinghouses and with approved counterparties for non-exchange-traded transactions.
4. Collateral Investment: The Commodities Program collateral investments shall only be invested in cash or government obligations used for future margin requirements, inflation linked bonds held for investment, a short-term investment fund, or any receivable due from an approved counterparty to a commodity-related investment. The Board must approve any collateral investments not listed above.

## 9.2 Reporting Procedures

The Board recognizes the need to evaluate the investment performance of the Public Investment Managers who have been delegated the duty to invest the System's assets, and further recognizes that Public Investment Managers are under a fiduciary duty to the System. The Investment Staff shall evaluate the performance of each Public Investment Manager pursuant to the procedures outlined below.

Periodic reports from the Investment Staff should supply critical information on a continuing basis, such as the comparative investment performance, portfolio positions relative to stated strategy, and other perspectives of the Portfolios as requested by the Board. The reports should be examined to determine whether investment policy guidelines are being followed and if the Public Investment Managers have

met their established objectives. At least annually, the Investment Staff will confirm that each Public Investment Manager has complied with the Investment Policy Statement and contract guidelines.

Public Investment Managers will be expected to comply with the CFA Institute's Global Investment Performance Standards (GIPS) in calculating and reporting investment performance. The use of a time-weighted return formula (which minimizes the effect of contributions and withdrawals) should be utilized. The services of an outside, independent consulting firm to provide performance measurement and evaluation may be retained.

The Public Investment Manager shall:

1. Prepare a report to be delivered to the Investment Staff which includes those items requested by the System, in the format requested by the System. These reports shall be delivered as described below:
  - a. Monthly
    - i. A review of recent and anticipated investment activities;
    - ii. Investment results of the Portfolio;
    - iii. A summary of the risk characteristics of the Portfolio (e.g., country exposure vs. benchmark); and
    - iv. Other matters as requested by the Investment Staff from time to time.
  - b. Quarterly
    - i. Any changes in the firm's structure, professional team or product offerings;
    - ii. An analysis of the major changes which have occurred in the investment markets and in the Portfolio in particular since the last report;
    - iii. A summary of other key characteristics of the Portfolio; and
    - iv. Other matters as requested by the Investment Staff from time to time.
2. Meet with the Investment Staff at least annually to make a presentation describing the professionals, the investment process employed for the Portfolio, recent performance of the Portfolio, current investment strategy and outlook, and any other related issues as requested by the Investment Staff.
3. Immediately report all instances of economically material events which would affect investment performance of assets held (e.g., default, missed interest payments, violation of bond covenants, or significant business restructuring) to the Investment Staff and provide recommendations regarding options for addressing such issues, including withdrawing from the investment or other appropriate actions.
4. Advise the Investment Staff immediately and in writing if any of the following events occur within the Public Investment Manager's organization:
  - a. A change in staffing of key personnel;
  - b. A change in ownership or control (whether through acquisition, disposition, merger, consolidation, or otherwise) or in business focus of the Public Investment Manager;
  - c. Changes in philosophy or investment process that the Public Investment Manager was hired to implement;
  - d. Involvement in material litigation or fraud;
  - e. Any investigation or action by a federal or state regulatory body;
  - f. Loss of a significant client relationship(s); or
  - g. Any other event which could be judged to or deemed to adversely impact to a



significant degree the management, professionalism, integrity or financial position of the Public Investment Manager.

To the extent permitted by applicable law or contractual obligations, the CIO or ED reserves the right to suspend or terminate any Public Investment Manager at any time.

### 9.3 Performance Evaluation

The Investment Staff shall review the performance of each Public Investment Manager's Portfolio at least quarterly. Evaluation standards considered may include the following:

1. Net of fee performance rates of return ranking at or above the median of an appropriate universe or style peer group of Public Investment Managers over quarter-to-date, year-to-date, one-year, three-year, five-year, and since inception time periods;
2. Net of fee performance rates of return exceeding an appropriate market index benchmark, over quarter-to-date, year-to-date, one-year, three-year, five-year, and since inception time periods;
3. Sharpe ratio exceeding an appropriate market index benchmark over quarter-to-date, year-to-date, one-year, three-year, five-year, and since inception time periods;
4. Information ratio compared to the expected information ratio over quarter-to-date, year-to-date, one-year, three-year, five-year, and since inception time periods; and
5. Tracking error of the performance rates of return of the Public Investment Manager compared to the expected tracking error over one-year, three-year, five-year, and since inception time periods.

Further, the Investment Staff shall review the resources and management of the Public Investment Manager and its Portfolio at least annually. Evaluation standards considered may include the following:

1. Staffing of personnel;
2. Organizational structure;
3. Changes in investment strategy and developments in capital markets as they impact strategy;
4. Changes in resources;
5. Stability of business;
6. Changes in product offerings;
7. Performance against relevant peer groups;
8. Nonfinancial Investment Activity;
9. Client service; and
10. Conformance to this Policy.

### 9.4 Watch List

The purpose of the "Watch List" is to provide an objective plan to assist the CIO and Investment Staff in determining any action that is warranted when a Public Investment Manager is not meeting expectations. The Watch List shall be presented to the Board on a quarterly basis with more frequent updates as needed to discuss material changes.

#### 9.4.1 Conditions for Placement on the Watch List

Conditions considered in determining whether a Public Investment Manager may be placed on the Watch List include, but are not limited to, the following:

1. Quantitative
  - a. Performance
    - i. Net of fee performance rates of return rank in the bottom quartile of an appropriate universe or style peer group of Public Investment Managers over a three-year and/or five-year period; and

- ii. Net of fee performance rates of return less than an appropriate market index benchmark over a three-year and/or five-year time period.
- b. Risk-Adjusted Performance
  - i. Sharpe ratio of performance rates of return less than that of an appropriate market index benchmark over a three-year and/or five-year period; and
  - ii. Information ratio of performance rates of return less than the expected information ratio over a three-year and/or five-year period.
- 2. Qualitative
  - a. A change in staffing of key personnel;
  - b. A change in ownership or control (whether through acquisition, disposition, merger, consolidation, or otherwise) or in business focus of the Public Investment Manager;
  - c. Changes in philosophy or investment process that the Public Investment Manager was hired to implement, including Nonfinancial Investment Activity;
  - d. Public Investment Manager involvement in material litigation or allegation of fraud;
  - e. Any investigation or action by a federal or state regulatory body;
  - f. Material client servicing problems;
  - g. Deterioration of financial condition; and
  - h. Any event which is deemed to adversely impact the management, professionalism, integrity or financial position of the Investment Manager.

The CIO will determine if a Public Investment Manager qualifies for the Watch List based on the Quantitative and Qualitative conditions listed above. A Public Investment Manager that is placed on the Watch List will be promptly notified and given a 10-business day response period to explain the issues that led to their placement on the Watch List. Additional actions could include Staff meetings with the manager or a formal interview of the manager by the Board. Investment Staff will work with the Public Investment Manager to outline expectations for what will facilitate its removal from the Watch List. The Public Investment Manager's willingness and ability to meet these expectations must be deemed adequate by the CIO and Investment Staff; otherwise, the Public Investment Manager may be terminated.

#### **9.4.2 Conditions for Removal from the Watch List**

Public Investment Managers that are formally placed on the Watch List will be given a period of up to six months to remedy the rationale for being placed on the watch list or adequately explain the rationale for violating these guidelines, to the satisfaction of the Board, CIO, and Investment Staff ("Review Period"). At the conclusion of this Review Period, the CIO, advised by the Investment Staff, will decide as to whether the Public Investment Manager should be removed from / remain on the Watch List or be terminated.

#### **9.5 Investment Selection Criteria**

The CIO, Investment Staff, and Consultant are responsible for overseeing investments with Public Investment Managers. The CIO, Investment Staff, and Consultant shall also be responsible for sourcing and performing due diligence on Public Investment Managers. The sourcing responsibilities are a result of an ongoing review of Staff contacts and the Consultant's database. Each investment opportunity will be evaluated compared to other available investments and its risk/return characteristics, including Nonfinancial Investment Activities and ESG Commitments.

Due diligence will cover all issues as appropriate as determined by Staff and Consultant. Following completion of due diligence, a recommendation memorandum and materials outlining the investment will be distributed and presented to the CIO and ED for their review, comment and approval. Final

documentation and funding will be the responsibility of the Investment Staff with the assistance of the Consultant and as appropriate, Legal Counsel.

## Section 10 Private Markets Investment Guidelines

### 10.1 Statement of Purpose

The purpose of the Private Markets Program (“PM Program”) is to earn risk-adjusted returns in excess of public markets. The PM Program is also expected to decrease the volatility of the Defined Benefit Retirement Funds’ assets through the diversification benefits of having lower correlations with other asset classes.

For the purpose of this section, private markets refer to private equity investments (“Private Equity”) as well as private credit investments (“Private Credit”).

### 10.2 Description

Private Markets investments generate returns by investing in a universe of opportunities not typically available through the public markets. These investments have historically delivered returns that are higher than public markets while attempting to reduce risk through diversification.

The Private Equity and Private Credit markets are highly sophisticated and specialized with respect to variety and types of investment structures. There exists major competition for deal flow on the part of both limited and general partners. Market forces largely drive the bargaining of economic and legal terms. Most investment vehicles are structured as commingled and often blind pool investment partnerships. The most common offering forms are private placements where the governing laws of the partnership agreement impose a passive role on the limited partner investors. These contractual arrangements are long-term in nature and provide the general partner or sponsor a reasonable time horizon to wisely invest capital, add value through intensive operational management, then realize the proceeds of such an investment. Moreover, terms of the partnership are proposed by the general partner and are critical to the economic incentives and ultimate net performance of the partnerships.

### 10.3 General Guidelines

To strengthen the diversification of the PM Program, the following guidelines will be utilized in the Investment Staff's and Consultant's formulation of an annual investment strategy and pacing plan for the PM Program:

1. Investment Structure: Staff may utilize the following investment vehicles within the PM Program: private limited partnerships; group trusts; limited liability companies; and co-investments alongside general partners. Co-investment opportunities provide additional funding to specific investments being made by limited partnerships. In specific instances, the general partner can invite limited partners to provide additional investment capital alongside the investment partnership (in some cases through side-car vehicles intended to invest in multiple co-investments or sole-purpose vehicles formed for a single co-investment), typically at better economic terms.
2. Investment Timing Risks: Staff should limit the potential for any one investment to negatively impact the long-term results of the portfolio by investing across business cycles. The PM Program should gain exposure to the array of financing stages by opportunistically exploiting the best investments at different stages of the business cycle. Staff should also seek to build Private Equity and Private Credit portfolios that are broadly diversified across vintage years. Staff may also consider purchasing secondary partnership interests to shorten the effective life of the partnership interest and positively impact the current and long-term net return of the PM Program.

3. Industry Diversification: Given the blind pool nature of most private market investments, it is generally not feasible to target specific industry exposures; that said, staff should generally seek to diversify the PM Program across industries by investing in multi-sector funds, sector-specific funds where warranted, and targeted co-investments as appropriate. For venture capital (and, at times, other sub-strategies), it is recognized that opportunities may be most readily realized in a relatively small number of industries.
4. Geographic and Economic Location Diversification: The PM program shall seek to include investments diversified across various locations with different economic concentrations. The PM Program will be monitored regularly to maintain prudent levels of diversification, as determined by the CIO, Investment Staff and Consultant. International private market investments shall not exceed 50% of the PM Program.
5. General Partner Diversification: Investment Staff will seek to work with a variety of general partners due to their specialized expertise in particular segments of the Private Equity and Private Credit markets and deal flow sources. No more than 15% of the PM Program's commitments shall be invested with any individual sponsor organization without Board approval. The PM Program is permitted to own up to 100% of any particular separate account, fund-of-one, co-investment fund, co-investment vehicle, or parallel partnership subject to the sponsor limitation above. The PM Program's combined commitment to any partnership and any parallel partnership shall not represent more than 75% of the total combined target capital commitments to the partnership and any parallel partnership without board approval. At any applicable closing, the PM Program's combined commitment to any partnership and any parallel partnership shall not represent more than 75% of the total combined cumulative capital commitments to the partnership and any parallel partnership without board approval. If a partnership and parallel partnership raise more capital than the target amount, then INPRS's combined commitment to the partnership and parallel partnership shall not represent more than 75% of the total combined cumulative capital commitments to the partnership and parallel partnership without board approval.
6. Alignment of Interests: Staff shall actively negotiate partnership agreements on behalf of the System with a prime directive to ensure that interests of the general partner are aligned with those of the System and supported by all other similar limited partners. This should include a competitive fee structure with participating interest in the investment for the commensurate risks being taken. Staff will also delineate between sweat and cash equity being committed by the general partner with an emphasis on the latter with respect to the preferred alignment tool.
7. Special Services: Due to the complex nature of alternative investment formats and the acknowledgement that Private Equity and Private Credit are high risk asset classes, expert Legal Counsel will be retained by Staff on an as needed basis. The Staff or Consultant may periodically be required to engage specialized firms to investigate principals for integrity, ethical problems, tax-related issues, etc. prior to an investment. Specialized firms may also be engaged to manage and liquidate non-cash distributions from private partnerships.
8. Legal Confirmation: For each Private Equity or Private Credit commitment, Legal Counsel shall provide written confirmation that documentation has been satisfactorily completed prior to closing of any investment in the PM Program that involves negotiated System documentation.
9. Contract Terms: Contract terms will generally be ten (10) years. Any contract may contain one

(1) or more option periods or provisions for extensions of the contract term, provided that any individual option period or extension does not exceed five (5) years in duration. No contract shall obligate the System for a period in excess of fifteen (15) years, excluding extensions. Contract terms applicable to any co-investment, co-investment fund, co-investment vehicle, or parallel partnership need not be explicitly defined if it is invested alongside a fund with a defined term that is in compliance with this policy. The System's general procurement policy as to contract terms is not applicable to these contracts.

10. Contract Conditions:

- a. No contract with the System may contain any terms or provisions prohibited by federal or Indiana law.
- b. If it is determined that any term or provision is invalid or unenforceable, such terms will be severed from the contract. The remaining terms and provisions shall be unimpaired and interpreted as if such invalid provisions were not contained in the contract.
- c. In all contractual decisions, the System shall take into account the particularly sensitive nature of the PM Program and shall consider the competence, quality of product, experience, and timely performance of the vendors in order to promote and ensure security, fairness, and integrity in the procurement process.

#### 10.4 Performance Objectives

The Board is committed to utilizing a global sourcing strategy in making partnership investment decisions. The following return objectives for the PM Program shall be reviewed:

##### Private Equity

1. Relative Return: the median return for all Private Equity funds as measured by a reputable database provider; and
2. Public Market Equivalent: a custom index based on INPRS's target exposures and using public market indices.

##### Private Credit

1. Relative Return: the median return for all Private Credit funds as measured by a reputable database provider; and
2. Public Market Equivalent: a custom index based on INPRS's target exposures and using public market indices.

#### 10.5 Investment Selection Criteria

The CIO, Investment Staff and Consultant are responsible for overseeing the PM Program. The CIO, Investment Staff and Consultant shall be responsible for sourcing and performing due diligence on investment opportunities for the PM Program. The sourcing responsibilities are a result of an ongoing review of Staff contacts and the Consultant's contacts and database. Each investment opportunity will be evaluated compared to other available investments and its risk/return characteristics, including Nonfinancial Investment Activities and ESG Commitments.

Due diligence will cover all issues as appropriate as determined by Staff and Consultant. Following completion of due diligence, a recommendation memorandum and materials outlining the investment will be distributed and presented to the CIO and ED for their review, comment, and approval. Final documentation, closing, and funding will be the responsibility of the Investment Staff with the assistance of the Consultant and Legal Counsel, as appropriate.

## Section 11 Real Assets Investment Guidelines

### 11.1 Statement of Purpose

The purpose of the Real Assets Program (“RA Program”) is to earn risk-adjusted returns by providing stable current income and preserving investment capital. The RA Program is also expected to decrease the volatility of the Defined Benefit Retirement Funds’ assets through diversification benefits of having lower correlations with other asset classes and by providing a hedge against unanticipated inflation. For the purpose of this section, real assets (“Real Assets”) refer to real estate investments (“Real Estate”) as well as infrastructure investments (“Infrastructure”).

### 11.2 Description

Real Assets investments generate returns by investing in physical assets that have an intrinsic worth due to their substance and properties. Real Estate includes property consisting of land, buildings, and property rights. Infrastructure includes investments in communications, energy, transportation, utilities, and natural resources.

The Real Assets market is highly sophisticated and specialized with respect to variety and types of investment structures. There exists major competition for deal flow on the part of both limited and general partners. Market forces largely drive the bargaining of economic and legal terms. Most investment vehicles are structured as commingled and often blind pool investment partnerships. The most common offering forms are private placements where the governing laws of the partnership agreement impose a passive role to the limited partner investors. These contractual arrangements are long-term in nature and provide the general partner or sponsor a reasonable time horizon to wisely invest capital, add value through intensive operational management, and then realize the proceeds of such an investment. Moreover, terms of the partnership are proposed by the general partner and are critical to the economic incentives and ultimate net performance of the partnership.

### 11.3 General Guidelines

To strengthen the diversification of the RA Program, the following guidelines will be utilized in the Investment Staff’s and Consultant’s formulation of an annual investment strategy and pacing plan for the RA Program:

1. Investment Structure: Staff may utilize the following investment vehicles within the RA Program: private limited partnerships; group trusts; limited liability companies; direct and joint ventures, and co-investments alongside general partners. Co-investment opportunities provide additional funding to specific investments being made by limited partnerships. In specific instances, the general partner can invite limited partners to provide additional investment capital (in some cases through side-car vehicles intended to invest in multiple co-investments or sole-purpose vehicles formed for a single co-investment), typically at better economic terms.

In addition to private market investments, staff may also utilize public securities. Public real estate investment trusts (“REITs”) and real estate operating companies (“REOCs”) are generally considered to have risk/return attributes consistent with core real estate. Other public securities including but not limited to those collateralized by automobiles, aircraft, and intellectual property may also be included.

2. Investment Timing Risks: Staff should limit the potential for any one investment to negatively impact the long-term results of the portfolio by investing across business cycles.

The RA Program should gain exposure to the array of opportunities by exploiting the best investments at different stages of the business cycle. Staff should also seek to build a Real Asset portfolio that is broadly diversified across vintage years. Staff may also consider purchasing secondary partnership interests to shorten the effective life of the partnership interest and positively impact the current and long-term net return of the RA Program.

3. Sector and Property Type Diversification: The RA Program shall seek diversification through investments in core, core-plus, value-added, and opportunistic sectors. The Real Estate portfolio within the RA Program shall also seek diversification through investments in office, retail, multi-family, industrial and non-traditional categories such as hotels, self-storage, senior housing, land and other property types. The Infrastructure portfolio shall seek sector diversification through investments in traditional infrastructure subsectors including utilities, transportation, energy, and social infrastructure. The RA Program will be monitored regularly to maintain prudent levels of diversification, as determined by the CIO, Investment Staff and Consultant.
4. Geographic and Economic Location Diversification: The RA Program shall seek to include investments diversified across various locations with different economic concentrations. The RA Program will be monitored regularly to maintain prudent levels of diversification, as determined by the CIO, Investment Staff and Consultant. International Real Asset investments shall not exceed 50% of the RA Program
5. General Partner Diversification: Investment Staff will seek to work with a variety of general partners due to their specialized expertise in particular segments of the Real Estate and Infrastructure markets and deal flow sources. No more than 20% of the RA Program's commitments shall be invested with any individual sponsor organization without Board approval. The RA Program is permitted to own up to 100% of any particular separate account, fund-of-one, co-investment fund, co-investment vehicle, or parallel partnership subject to the sponsor limitation above. The RA Program's combined commitment to any partnership and any parallel partnership shall not represent more than 75% of the total combined target capital commitments to the partnership and any parallel partnership without Board approval. At any applicable closing, the RA Program's combined commitment to any partnership and any parallel partnership shall not represent more than 75% of the total combined cumulative capital commitments to the partnership and any parallel partnership without Board approval. If a partnership and parallel partnership raise more capital than the target amount, then INPRS's combined commitment to the partnership and parallel partnership shall not represent more than 75% of the total combined cumulative capital commitments to the partnership and parallel partnership without Board approval.
6. Alignment of Interests: Staff shall actively negotiate partnership agreements on behalf of the System with a prime directive to ensure that interests of the general partners are aligned with those of the System and supported by all other similar limited partners. This should include a competitive fee structure with participating interest in the investment for the commensurate risks being taken. Staff will also delineate between sweat and cash equity being committed by the general partner with an emphasis on the latter with respect to the preferred alignment tool.
7. Leverage: The System recognizes that leverage is an inherent component of Real Asset investments and the use of leverage can be an effective means to increase overall returns from



time to time on a risk-adjusted basis. There will be a limit of 60% loan to value for the aggregate RA Program. This limit will be derived from the values reported by the Investment Managers. Should the leverage limit be exceeded, the Investment Staff and Consultant will develop a plan to rebalance the RA Program to comply with the target leverage percentage. All leverage will be secured through Portfolios. Recourse debt to the System is not permitted.

8. Special Services: Due to the complex nature of alternative investment formats and the acknowledgment that Real Estate and Infrastructure are high risk asset classes, expert Legal Counsel will be retained by Staff on an as needed basis. The Staff or Consultant may periodically be required to engage specialized firms to investigate principals for integrity, ethical problems, tax-related issues, etc. prior to an investment. Specialized firms may also be engaged to manage and liquidate non-cash distributions from private partnerships.
9. Legal Confirmation: For each Real Estate and Infrastructure commitment, Legal Counsel shall provide written confirmation that documentation has been satisfactorily completed prior to closing of any investment in the RA program that involves negotiated System documentation.
10. Contract Terms: For closed-end investment vehicles, contract terms will generally be ten (10) years. Any contract may contain one (1) or more option periods or provisions for extensions of the contract term, provided that any individual option period or extension does not exceed five (5) years in duration. No contract shall obligate the System for a period in excess of fifteen (15) years, excluding extensions. Contract terms applicable to any co-investment, co-investment fund, co-investment vehicle, or parallel partnership need not be explicitly defined if it is invested alongside a fund with a defined term that is in compliance with this policy. The System's general procurement policy as to contract terms is not applicable to these contracts.
11. Contract Conditions:
  - a. No contract with the System may contain any terms or provisions prohibited by federal or Indiana law.
  - b. If it is determined that any term or provision is invalid or unenforceable, such terms will be severed from the contract. The remaining terms and provisions shall be unimpaired and interpreted as if such invalid provisions were not contained in the contract.
  - c. In all contractual decisions, the System shall take into account the particularly sensitive nature of the RA program and shall consider the competence, quality of product, experience, and timely performance of the vendors in order to promote and ensure security, fairness, and integrity in the procurement process.

#### 11.4 Performance Objectives

The Board is committed to utilizing a global sourcing strategy in making partnership investment decisions. The following return objectives for the RA Program shall be reviewed:

1. Absolute Return (net of fees): a real rate of return (adjusted for inflation) of five percent (5%);
  2. Relative Return: the median return for all Real Asset funds within a corresponding sub-asset class as measured by a reputable database provider; and
- Public Market Equivalent: a custom index based on INPRS's target exposures and using public market indices.

#### 11.5 Investment Selection Criteria

The CIO, Investment Staff and Consultant are responsible for overseeing the RA Program. The CIO, Investment Staff and Consultant shall be responsible for sourcing and performing due diligence on

investment opportunities for the RA Program. The sourcing responsibilities are a result of an ongoing review of Staff contacts and the Consultant's contacts and database. Each investment opportunity will be evaluated compared to other available investments and its risk/return characteristics, including Nonfinancial Investment Activities and ESG Commitments.

Due diligence will cover all appropriate issues as determined by Staff and Consultant. Following completion of due diligence, a recommendation memorandum and materials outlining the investment will be distributed and presented to the CIO and ED for their review, comment, and approval. Final documentation, closing, and funding will be the responsibility of the Investment Staff with the assistance of the Consultant and Legal Counsel, as appropriate.

## Section 12 Absolute Return Investment Guidelines

### 12.1 Statement of Purpose

The purpose of the Absolute Return Strategies Program (“ARS Program”) is to enhance the long-term risk-adjusted returns of the Defined Benefit Retirement Fund by providing diversification benefits and a reduction to systematic risk. The Staff believes that these objectives have a higher probability of being met if the ARS Program is constructed with the appropriate diversification among strategies and Portfolios, and is properly aligned with the Defined Benefit Retirement Funds’ objectives.

### 12.2 Description

Absolute Return Strategies (“ARS”) generate returns by exploiting mispricing and inefficiencies in global capital markets, while attempting to reduce exposures to primary market factors (e.g., interest rates and equities) through various hedging techniques. These strategies have historically delivered returns that are less correlated with equity and fixed-income markets than traditional investment strategies.

### 12.3 General Guidelines

1. Investment Structure: Direct investing in ARS requires sophisticated risk management systems, operational infrastructure, trading capabilities and specialized investment expertise and may also involve the use of leverage, short selling, and derivative instruments. Therefore, the ARS Program should be implemented by placing assets in limited liability vehicles—to protect the Defined Benefit Retirement Funds from losing more than their invested capital—under the discretion of experienced Investment Managers. These Investment Managers, who may manage and operate direct hedge funds or funds of hedge funds (FoHF), typically charge management and incentive fees, which should align the interests of investors with the performance of the managers.
2. Investment Timing: These guidelines are based on the ARS Program being fully funded. As a result, during funding or transition phases, the percentages shown in Table 12.1 may be temporarily breached.
3. Corrective Action: To the extent that the ARS Program exceeds any of the established guidelines discussed in this Section, the CIO, Investment Staff, and Consultant should take corrective action expeditiously to bring the portfolio back into compliance once a breach has been identified. The results of these corrective actions may not be immediately evident given the relatively illiquid nature of hedge fund vehicles.
4. Strategy Diversification: The ARS Program should be diversified across and within strategies, without regard to the vehicle (direct hedge fund vs. FoHF), through diversified investments in tactical trading, relative value, event driven, equity long/short, multi strategy, or opportunistic investments. Due to differentiation in investment strategy within absolute return sub-asset classes, the CIO, Investment Staff, and Consultant will conduct ongoing diligence to maintain prudent levels of diversification.
  - a) Opportunistic Investments: The ARS Program may also from time to time fund Portfolios that exhibit attractive risk/return profiles that do not offer the full diversification benefits of an absolute return mandate. These investments may be more directional strategies, which could carry more systematic exposure. As such, these Portfolios should be limited to 50% of the ARS Program at funding. The assets allocated under these mandates may deviate from the hedge fund structures as outlined in this section

and will be evaluated against appropriate benchmarks. ARS Co-Investments shall be included in the Opportunistic Investments bucket.

5. Investment Size: The ARS Program should generally be diversified as follows:
  - a. Maximum allocation to any one management firm: 30%
  - b. Maximum allocation to any single Direct fund: 30%
  - c. Maximum allocation to any FoHF: 50%
6. Liquidity: While investments in illiquid securities, or hedge funds with long lock-up periods, are often key to enhancing returns, the fully developed ARS Program, excluding up to 25% of the overall ARS portfolio's weight that may reside within the Opportunistic Investments strategy, shall target portfolio level liquidity of not more than one (1) year, as measured by the asset-weighted average period for redemption of all underlying funds. Up to 25% of the ARS portfolio's weight may reside in the Opportunistic Investments bucket with no liquidity restrictions.
7. Use of Derivatives: In the normal course of risk management, the ARS Program may elect to engage in derivatives transactions to offset, or hedge, unintended market exposures in underlying funds that remain in a lock-up period. To avoid counterparty risk, these transactions shall be executed with listed options and futures traded on registered exchanges, whenever possible. Non-exchange-traded options, forwards, or swaps shall be deemed acceptable only if the counterparty is rated "A" or better by at least one of the Nationally Recognized Statistical Rating Organizations ("NSRSOs").
8. Contract Terms: No contract, except for opportunistic investments, shall obligate the System for a period in excess of three (3) years. Any contract may contain one (1) or more option periods or provisions for extensions of the contract term, provided that any individual option period or extension does not exceed three (3) years in duration.
9. Contract Conditions: No contract with the System may contain any terms or provisions prohibited by federal or Indiana law. If it is determined that any term or provision is invalid or unenforceable, such terms will be severed from the contract. The remaining terms and provisions shall be unimpaired and interpreted as if such invalid provisions were not contained in the contract.

## 12.4 Performance Objectives

The aim in building the ARS Program is to select the highest-quality funds and vehicles to form a diversified portfolio capable of meeting targeted performance objectives. The risk and return objectives for the ARS Program, as noted below, shall be reviewed:

1. Target an annualized return (net of fees): Cash + 2.5%;
2. Relative Return: a custom index based on the ARS Program target exposures and using HFRI indices; and
3. Target Correlation: 0.5 or less to the Defined Benefit Retirement Fund excluding the ARS Portfolio.

## 12.5 Investment Selection Criteria

The CIO, Investment Staff, and Consultant are responsible for overseeing investments in ARS. The CIO, Investment Staff, and Consultant shall also be responsible for sourcing and performing due diligence on ARS. The sourcing responsibilities are a result of an ongoing review of Staff contacts and the Consultant's database. Each investment opportunity will be evaluated compared to other available investments and its risk/return characteristics, including Nonfinancial Investment Activities and ESG Commitments.

When selecting Investment Managers for the ARS Program, the Investment Staff and Consultant should consider, but not be limited to, the following attributes:

1. Investment Manager performance history;
2. Terms and structure of investment;
3. Fit with rest of ARS Program;
4. ARS Program investment relative to the size of the Portfolio, including capacity in the proposed vehicle;
5. Willingness to agree to side-letter provisions;
6. Investment strategy, including strategy overview, decision making, research process, and the growth history of assets under management;
7. Investment team, including staffing, key person dependency, turnover, compensation, and ownership;
8. Risk management, including philosophy, systems, asset/liability mismatch, risk exposure and leverage, position sizing, and preferential terms;
9. Operations and Infrastructure, including fund transparency, business philosophy, business complexity, processes, non-investment staffing, independence of net asset value calculation; and
10. Regulatory, compliance and financial statement review.

Following completion of due diligence, a recommendation memorandum and materials outlining the investment will be distributed and presented to the CIO and ED for their review, comment and approval. Final documentation and funding will be the responsibility of the Investment Staff with the assistance of the Consultant and as appropriate, Legal Counsel.

## Section 13 Risk Parity Investment Guidelines

### 13.1 Statement of Purpose

The purpose of the Risk Parity Program (“RP Program”) is to deliver consistent and high risk-adjusted rates of return as a standalone investment through the allocation of capital in a way that equalizes risk across a set of potential macro-economic environments. Overall, the RP Program should improve diversification and economic environmental balance of the Defined Benefit Retirement Funds, and therefore, minimize the likelihood of severe and sustained drawdowns.

### 13.2 Description

The Board understands that diversification goes beyond the concept of capital-based allocations among different asset classes. To create a truly well-diversified portfolio, one must consider how various asset classes have historically performed under different economic environments, and appropriately weigh them from a risk-budget perspective.

Risk Parity aims at creating a well-balanced portfolio that can deliver consistent and high risk-adjusted returns in several macro-economic environments. It rests on the following key tenets:

1. Over a full market cycle, most asset classes carry a risk premium, and by investing in them, investors expect to earn a return higher than that offered by cash instruments.
2. The return of a particular asset class is proportional to its risk over long periods of time (i.e., different asset classes have similar Sharpe Ratios).
3. The main drivers of returns are growth and inflation factors, and certain asset classes perform better than others depending on the combination of such factors the economy is facing.

### 13.3 General Guidelines

1. Investment Structure: Direct investing in Risk Parity strategies requires sophisticated risk management systems, operational infrastructure, trading capabilities, and it may also involve the use of leverage to better capture the magnitude and nature of the leverage (i.e. it is implicit that INPRS cannot lose more than the original capital invested. Consequently, the RP Program should be implemented by Investment Managers with demonstrated expertise in these areas.
2. Investment Manager Concentration: The RP Program shall be a multi-manager program utilizing differentiated Investment Managers. No more than 50% of the funds dedicated to Risk Parity shall be placed with any single Investment Manager.
3. Contract Conditions: No contract with the System may contain any terms or provisions prohibited by federal or Indiana law. If it is determined that any term or provision is invalid or unenforceable, such terms will be severed from the contract. The remaining terms and provisions shall be unimpaired and interpreted as if such invalid provisions were not contained in the contract.

### 13.4 Performance Objectives

The risk and return objectives for the RP Program, as noted below, shall be reviewed:

1. Target annualized return (net of fees): the Target Rates of Return; and
2. Target annualized volatility of performance returns (standard deviation): 10% - 12%.

### 13.5 Investment Selection Criteria

The CIO, Investment Staff, and Consultant are responsible for overseeing investments with Risk Parity managers. The CIO, Investment Staff, and Consultant shall also be responsible for sourcing and performing due diligence on Risk Parity managers. The sourcing responsibilities are a result of an ongoing review of Staff contacts and the Consultant's database. Each investment opportunity will be evaluated compared to other available investments and its risk/return characteristics, including Nonfinancial Investment Activities and ESG Commitments.

When selecting Investment Managers for the RP Program, the CIO, Investment Staff, and Consultant should consider, but not be limited to, the following attributes:

1. Investment Manager performance history;
2. Terms and structure of investment;
3. RP Program investment relative to the size of the Portfolio, including capacity in the proposed vehicle;
4. Willingness to agree to side-letter provisions;
5. Investment strategy, including strategy overview, decision making, research process, and assets under management growth history;
6. Investment team, including staffing, key person dependency, turnover, compensation, and ownership;
7. Risk management, including philosophy, systems, asset/liability mismatch, risk exposure, and leverage, position sizing, and preferential terms;
8. Operations and infrastructure, including fund transparency, business philosophy, business complexity, processes, non-investment staffing, independence of net asset value calculation; and
9. Regulatory, compliance, and financial statement review.

Following completion of due diligence, a recommendation memorandum and materials outlining the investment will be distributed and presented to the CIO and ED for their review, comment and approval. Final documentation and funding will be the responsibility of the Investment Staff with the assistance of the Consultant and as appropriate, Legal Counsel.

## Addendum 1 Guidelines for the Custodian

### 1.1 Custody of System's Assets

The System's assets must be held by a bank or trust company under a custodial agreement or agreements.<sup>17</sup> The Custodian must be domiciled in the United States and approved by the Board to (1) act in a fiduciary capacity and (2) manage custodial accounts on behalf of the System.<sup>18</sup> Income, interest, proceeds of sale, materials, redemptions, and all other receipts from securities and other investments which the Board retains for the cash working balance shall be deposited with the Custodian as authorized by the Board.<sup>19</sup>

### 1.2 Guidelines for the Custodian

The Board recognizes that accurate and timely completion of custodial functions is necessary for effective investment management and accurate records. The Custodian is a fiduciary as to the assets placed with them by the System. The following custodial responsibilities have been identified by the Board:

1. Provide complete custody and depository services for the designated accounts;
2. Provide for prompt investment of any cash;
3. Implement in a timely and effective manner the investment actions as directed by the Investment Manager(s);
4. Collect and receive all income and principal realizable and properly report transactions in periodic statements;
5. Provide monthly and annual accounting statements as well as on-line access accounting for the System, including all transactions; these should be based on accurate security values both for cost and market value. These reports should be provided within a time frame acceptable to the Board;
6. Report to the Staff situations where security pricing is either not possible or subject to considerable uncertainty;
7. Distribute to the Investment Manager(s) in a timely manner all proxy voting materials;
8. Provide assistance to the Board and Staff, to complete such activities as the annual audit, transaction verification and other issues;
9. As requested by Board or Staff, provide performance measurement and portfolio analytics for the System, consistent with CFA Institute Global Investment Performance Standards (GIPS);
10. When directed by the Board, and pursuant to a separate, written agreement for securities lending service, implement, in a fair and equitable manner, a securities lending program for the System, and report fully on all aspects of its operation and returns;
11. The Custodian shall cooperate fully with all reasonable requests for documents and records made by the Board, Staff or a Consultant. The Board (on its own or through Staff or a Consultant) shall periodically review the Custodian, including but not limited to, services provided, services available, charges and fees, and reports;
12. Reconcile differences in performance with Investment Managers;
13. The Custodian shall conform to all provisions in its contracts with the System; and
14. The Custodian shall comply with all applicable federal and Indiana laws.

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<sup>17</sup> IC 5-10.3-5-4(a)

<sup>18</sup> IC 5-10.3-5-5 and IC 5-10.4-3-13

<sup>19</sup> IC 5-10.3-5-4(a)



### **1.3 Custodian Role and Authority in Securities Litigation**

The Board recognizes the importance of the Custodian's role in securities litigation monitoring. The following custodial responsibilities have been identified by the Board:

1. Maintain and communicate data necessary to identify the System's securities holdings and transactions in order to determine if the System is a class member, calculate amount of losses, and prepare proofs of claim;
2. Collect and distribute to appropriate parties (i.e., monitoring firm, evaluation counsel, litigation counsel) all notices regarding the commencement, class certification, and settlement of class action lawsuits in which the System has an interest as an actual or potential class member;
3. Collect and deposit into appropriate accounts all investment proceeds of the System's claims;
4. Establish and implement a procedure to identify all securities class actions filed by others in which the System is or may be a class member;
5. Timely file proofs of claim on behalf of System in all class actions in which System may participate as class member; and
6. Provide quarterly reports to CIO regarding status of all class actions in which System is a class member, including status of all proofs of claim.

## Addendum 2 Defined Contribution Retirement Funds

### 2.1 Introduction

The purpose of this Addendum is to:

1. Outline the number and characteristics of investment options selected by the Board for the Defined Contribution Retirement Funds (“DC Retirement Funds”); and
2. Provide rate-of-return objectives and establish formal criteria to monitor and evaluate the performance results of the various investment options.

### 2.2 Statutory Authority

The DC Retirement Funds are bookkeeping accounts established for each member. The member has investment direction for the investment of their balance and contributions to various investment funds. However, in the absence of an investment election made by a member in the DC Retirement Funds, a default investment option has been established by the System. The assets of members who do not make an active selection among the available investment fund options will be placed into an age-appropriate Target Date Retirement Fund.

The DC Retirement Funds are subject to the following provisions:

1. The Board must maintain a “Stable Value Fund” option within the DC Retirement Funds<sup>20</sup>
2. The Board must establish alternative investment options.
  - a. The Board must maintain an alternative investment option that is an indexed stock fund option within the DC Retirement Funds.<sup>21</sup>
  - b. The Board must maintain an alternative investment option that is a bond fund within the DC Retirement Funds.<sup>22</sup>
  - c. The Board may establish any other options it wishes, so long as the options represent a variety of investment objectives.<sup>23</sup>
3. Administrative investment costs of each investment fund option are paid from the earnings on that option.<sup>24</sup>
4. A valuation of each member's account in the DC Retirement Funds must be completed no later than the last day of each quarter, and is currently valued on a daily basis as provided by a rule of the Board.<sup>25</sup>

### 2.3 Delegated Authority

The ED is authorized by the Board, pursuant to a recommendation of the CIO, to retain, manage, and terminate Investment Managers within each investment fund option as required to achieve the investment objectives of the DC Retirement Funds within the limitations outlined in Section 5.3 and the following limitations:

1. The addition or removal of any investment alternative not required in Indiana law must receive prior authorization from the Board.

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<sup>20</sup> IC 5-10.2-2-3(b)

<sup>21</sup> IC 5-10.2-2-3(c)(1)

<sup>22</sup> IC 5-10.2-2-3(c)(1)

<sup>23</sup> IC 5-10.2-2-3(c)(2)

<sup>24</sup> IC 5-10.2-2-3(c)(4)

<sup>25</sup> IC 5-10.2-2-3(c)(5)

2. Any changes to which participant investment fund option is selected as the DC Retirement Funds' default option must receive prior authorization from the Board.
3. Any major changes (i.e., equity vs. fixed income glidepath) to the investments of the DC Retirement Funds' default option (i.e., Target Date Retirement Funds) that materially change its long-term risk and/or return expectations must receive prior authorization from the Board.

If an investment opportunity requires more immediate action and requires prior notification and/or approval by the Board, the Board recognizes that the ED and CIO may request that the full Board convene between regularly scheduled meetings, via conference call, to review and approve the investment.

Approval authority set forth in this Policy shall be reviewed upon the departure of either the ED or CIO, to consider the suitability of this investment authority delegated by the Board.

## 2.4 Objectives and Structure

The DC Retirement Funds have been structured to provide members with a choice of several diverse investment options that offer a range of risk and return characteristics appropriate for members. A member may direct an allocation in the amount credited to the member among the Stable Value Fund and available alternative funds subject to the following conditions<sup>26</sup>:

1. A member is allowed to make a change or selection at least once a day.
2. A member's selection shall be implemented the same day the selection is received by the System, unless such selection is received after 4:00 p.m. EST on a business day, or anytime on a weekend or holiday, or any other date the New York Stock Exchange is closed, then the System shall implement the member's selection beginning the next business day after the selection is received. This date is the effective date of the member's selection.
3. A member may select any combination of the Stable Value Fund or any of the available alternative accounts in one percent (1%) increments.
4. A member's selection remains in effect until a new selection is made.
5. On the effective date of a member's selection, the member's existing balance or balances shall be reallocated in accordance with the member's direction, based on:
  - a. For an alternative investment program balance, the market value on the effective date; and
  - b. For any Stable Value Fund program balance, the balance of the member's account on the effective date.

The DC Retirement Funds investment fund options currently include:

1. Stable Value Fund;
2. Money Market Fund;
3. Inflation Linked Fixed Income Fund;
4. Fixed Income Fund;
5. Target Date Retirement Funds;
6. Large Cap Equity Index Fund;
7. Small/Mid Cap Equity Fund; and
8. International Equity Fund.

The number and types of investment funds available will be periodically reviewed by the Board in order

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<sup>26</sup> 35 IAC 1.2-5-21

to ensure a diversity of investment alternatives, adequate and reasonable availability of investment types, and clarity and usefulness of the investment choices.

Annually, the System is required to prepare a separate analysis of the investment fund options available in the DC Retirement Funds, including the Stable Value Fund and each alternative investment fund. Such analysis must:<sup>27</sup>

1. Include a description of the procedure for selecting an alternative investment program;
2. Be understandable by most members; and
3. Include a description of prior investment performance.

## **2.5 Investment Policy Guidelines**

### **2.5.1 Money Market Fund**

The investment objective of the Money Market Fund is to provide investment in short-term, principal preserving securities. The fund will be invested according to Section 9 (Public Investment Guidelines).

### **2.5.2 Stable Value Fund**

The investment objective of the Stable Value Fund is to provide a competitive level of income over time while preserving the principal value. The fund will be invested according to Section 9 (Public Investment Guidelines).

### **2.5.3 Inflation Linked Fixed Income Fund**

The investment objective of the Inflation-Linked Fixed Income Fund is to provide a real return investment option which is primarily invested in Treasury Inflation Protected Securities (TIPS). The fund will be invested according to Section 9 (Public Investment Guidelines).

### **2.5.4 Fixed Income Fund**

The investment objective of the Fixed Income Fund is to provide investment in the broad domestic bond market. The fund will be invested according to Section 9 (Public Investment Guidelines).

### **2.5.5 Target Date Retirement Funds**

The investment objective of the Target Date Retirement Funds is to provide a complete asset allocation strategy that seeks to generate the maximum, appropriate amount of total return, with consideration paid to relevant risks faced by the DC Retirement Funds' participants at the appropriate time in the glide path. Relevant risks defined by the System include, but are not limited to:

- Longevity Risk - outliving your retirement savings.
- Shortfall Risk - not being able to maintain your desired standard of living.
- Inflation Risk - inflation outpacing investment returns.
- Market Risk - market movements harming retirement savings.

The mix of equity and fixed income within the Target Date Retirement Funds becomes more conservative over time until it reaches the allocation of the Retirement Fund. The funds will be invested according to Section 9 (Public Investment Guidelines).

### **2.5.6 Large Cap Equity Index Fund**

The investment objective of the Large Cap Equity Index Fund is to provide investment in the broad domestic equity market. The fund will be invested according to Section 9 (Public Investment Guidelines).

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<sup>27</sup> IC 5-10.2-2-3(d)

### **2.5.7 Small/Mid Cap Equity Fund**

The investment objective of the Small/Mid Cap Equity Fund is to provide investment in the stock of small to mid-capitalization domestic companies, typically referred to as small/mid cap stocks. The fund will be invested according to Section 9 (Public Investment Guidelines).

### **2.5.8 International Equity Fund**

The investment objective of the International Equity Fund is to provide a broad exposure to foreign equity markets. The fund will be invested according to Section 9 (Public Investment Guidelines).

## **2.6 Performance Objectives**

The Board has determined that it is in the best interest of the DC Retirement Funds' participants and beneficiaries that performance objectives be established for each investment alternative, and it is clearly understood that these objectives are to be viewed over the long term and have been established after full consideration of all factors set forth in this Addendum. The performance of each individual option will be evaluated relative to a market index and to a meaningful peer group of active managers. The evaluation of performance results will be accomplished according to the standards established in Section 9 of this Policy. Specific benchmarks for each option are delineated below:

1. Money Market Fund: 90-day Treasury Bill rate;
2. Stable Value Fund: 3yr Constant Maturity Treasury;
5. Inflation Linked Fixed Income Fund: Bloomberg US TIPS Index;
6. Fixed Income Fund: Bloomberg US Aggregate Bond Index;
7. Target Date Retirement Funds: Composite of various benchmarks that closely match each Target Date Fund's allocation;
8. Large Cap Equity Index Fund: Standard & Poor's 500 Index;
9. Small/Mid Cap Equity Fund: Russell Small Cap Completeness Index; and
10. International Equity Fund: Morgan Stanley Capital International (MSCI) All Country World Index (ACWI) ex USA ex China ex Hong Kong Investable Market Index (IMI).

## **2.7 Rebalancing Guidelines**

The Board has enacted the following rebalancing guidelines for execution by the Custodian at the direction of the CIO and Investment Staff:

1. Small/Mid Cap Equity, International Equity and Fixed Income Options: Rebalancing shall occur systematically on a monthly basis, unless the underlying investment managers' allocations are within +/- 100 basis points (1 percentage point) of the strategic targets, as reviewed by the Board on an annual basis.
2. Target Date Options: Rebalancing shall occur systematically on a monthly basis, unless the underlying investment options' allocations are within +/- 50 basis points (0.5 percentage point) of the strategic targets, as reviewed by the Board on an annual basis.

## **2.8 Recordkeeper Role**

The Board recognizes the importance of a recordkeeper to deliver recordkeeping administration, as well as participant and plan sponsor services, for the DC Retirement Funds. A recordkeeper serves as the bookkeeper of the DC Retirement Funds, managing the day-to-day operations and processing participant transactions. The recordkeeper will perform the specific duties outlined within its contractual agreement with INPRS.

## Addendum 3 Trading and Brokerage Policy

### 3.1 Introduction

The Board intends to fulfill its responsibility for the evaluation and management of the System's transaction costs for the benefit of members and beneficiaries. To assist in accomplishing these duties, the Board has adopted the following trading and brokerage policy.

### 3.2 Best Execution

Best execution is to take all reasonable efforts to obtain the best possible result in trading securities on a consistent basis, taking into account the following:

- Quantitative factors, such as price, commission, spread, implicit market impact, and size of the trade relative to volume, and
- Qualitative factors, such as likelihood of execution within a desired timeframe, market conditions, ability of a broker/dealer to act on a confidential basis, ability of a broker/dealer to handle large trades in securities having limited liquidity without undue market impact, creditworthiness of a broker-dealer, willingness of a broker/dealer to commit capital to a particular transaction, market knowledge of a broker/dealer, back office infrastructure of a broker/dealer, fairness of a broker/dealer in resolving trade disputes, and responsiveness of a broker/dealer to request.
- If an Investment Manager utilizes soft dollar commissions, the Investment Manager must ensure that INPRS's mandate is benefiting from the program and does not pay an unreasonably disproportionate amount of other clients' and other investment strategies' research and brokerage services, as protected by Section 28(e) of the Securities Exchange Act of 1934.

### 3.3 Basic Principle

The Board requires that best execution, as defined in 3.2, must apply to trades.

### 3.4 Self-Dealing

The Board intends there to be a prohibition on any self-dealing on the part of any brokerage firm, including with the firm's broker affiliate, without specific written prior authorization from the CIO or ED.

### 3.5 Basic Criteria for Selection of Brokerage Firm

Subject to any direction from the CIO or ED, each Investment Manager will be responsible for the selection of brokerage firms, or automated trading systems through which trading will be completed for the System. Each Investment Manager is also responsible for conducting all appropriate due diligence on the brokerage firms it selects. Their selection must in all cases meet the basic principles as defined in 3.3.

### 3.6 Directed Brokerage/Commission Recapture Policy

The CIO or ED, on behalf of the Board, retain the right to direct brokers and enter into brokerage commission recapture agreement(s). Accordingly, the Board has developed the following policy guidelines to ensure that any directed brokerage or commission recapture serves the interests of the System's members and their beneficiaries:

1. The objective of this policy is to achieve best execution;
2. Any directed commission brokers will be selected through a process directed by Staff;
3. The percentage of Investment Manager's Portfolio to be directed to the Board's directed commission broker(s) shall be mutually agreed upon between Investment Manager and Staff. Staff shall seek the advice of the Consultant during this process. The objective will be to select a

percentage amount that generates substantial commission savings, without hindering the Investment Manager's abilities to execute investment strategies that meet the objectives set forth in the Investment Management Agreement;

4. Directed commission brokers will provide Staff with periodic reports that document the date and commission amount associated with every directed trade, by the Investment Manager. In this manner, Staff will be able to monitor the overall directed brokerage program, the services of the directed commission broker, and the progress each Investment Manager is making toward any directed commission goal;
5. Commission recapture services will be utilized, where feasible, to defray costs and benefit the Fund's members, subject to the Investment Manager's "best execution" efforts; and
6. The Board intends there to be a prohibition on any self-dealing on the part of any brokerage firm, including with the firm's affiliate, without specific prior authorization.

### **3.7 Review/Evaluation**

Annually, the CIO and Investment Staff shall review the transactions and arrangements for compliance with these policies through a best execution analysis. The Investment Managers and Custodian shall provide any information necessary to conduct this review.

### **3.8 Disclosure**

In addition, each Investment Manager shall report on brokerage firms they are using and the terms of those relationships. This disclosure must cover all components of that relationship, including but not limited to, payment for order flow, soft dollars, covered expenses, and the nature of the broker selection process.

### **Addendum 4 Cash Overlay Policy**

The Defined Benefit Retirement Funds have a target asset allocation to cash of 0%. However, cash must be kept to pay benefit disbursements and other expenses. In an effort to minimize cash exposure at both the Defined Benefit Retirement Funds and Investment Manager level, the System may retain a cash overlay manager to more closely align the actual portfolio with the Board-approved asset allocation stated in Section 6 (Asset Allocation), through the buying and selling of futures contracts to increase or decrease asset class exposures, as necessary ("Cash Overlay").

The CIO may authorize the use of the Cash Overlay for short-term investments of cash flows as well as rebalancing purposes through buying futures in the underweight asset class (long exposures) and shorting futures in the overweight asset classes (short exposures). The net notional value (defined as notional value of long positions minus short positions) of any derivative exposure in the Cash Overlay portfolio(s) shall be maintained at 100% or less of the cash value being overlaid.

The Cash Overlay is intended to accomplish the following:

1. Keep the total portfolio invested at the appropriate risk level
2. Improve total fund returns by investing cash exposures in the intended asset classes and earning the market risk premiums in excess of cash
3. Reduce tracking error relative to the Board-approved asset allocation
4. Efficiently manage ongoing cash flows at the Defined Benefit Retirement Funds level

The Cash Overlay can use a combination of derivative instruments such as futures, currency forwards, total return swaps and other OTC instruments that require International Swaps and Derivatives Association ("ISDA") agreements, to obtain the desired policy asset allocation exposures.



## Addendum 5 Securities Lending Policy

### 5.1 Background

The Board may authorize a Custodian to enter into a securities lending program agreement under which securities held by the Custodian on behalf of the System may be loaned. The purpose of such a program is to provide additional revenue for the System. This policy is not meant to cover securities lending performed by managers of commingled accounts. The Custodian shall agree to keep all assets of the System that are subject to its custodial care in a segregated account. Collateral initially in excess of the total market value of the loaned securities must be pledged by the borrower, and must be maintained at no less than the total market value of the loaned securities.

### 5.2 Investment Objective

The investment objective for the securities lending program is to generate incremental income within a high-quality investment program that safeguards the return of principal, maintains adequate daily liquidity, ensures diversification of the cash collateral portfolio and tightly controls exposure to fluctuating interest rates.

### 5.3 Method of Implementation

The securities lending program may be implemented through a Custodian or through a sub-agent of a Custodian. Subject to the approval of the Board, any current Custodian for the System may implement a securities lending program for the assets placed at that particular institution. Any Custodian may utilize a sub-agent at its discretion to conduct its securities lending program in lieu of maintaining an in-house capability. The use of any sub-agent must be approved in writing by the Board, and such approval may be revoked for any reason by the Board. It shall be the responsibility of the Custodian to ensure that their sub-agent adheres to all aspects of these Guidelines as well as any additional contracts with the System which exist in addition to these Guidelines. All costs associated with the use of a sub-agent shall be borne by the Custodian.

The Board expects the Custodian and/or securities lending sub-agent to offer suggestions with respect to any possible improvements in the program at least annually, and to monitor the results of the program (e.g., income, costs associated with the program, issues that arise with respect to the program) and report to the Investment Staff as directed.

The System shall be entitled to no less than eighty percent (80%) and the Custodian shall be entitled to no more than twenty percent (20%) of (1) the total Premiums (as defined below) paid by the borrower in a loan of securities against securities collateral; and (2) the total Yield (as defined below), after deducting the Rebate (as defined below), in a loan of securities against cash collateral unless otherwise agreed to by the Board.

The specifics pertaining to any securities lending program shall be detailed in a separate agreement (a "Securities Lending Agreement").

### 5.4 Risk Controls

The Board is responsible for evaluating the income attributable to the program and the risks inherent in the program. The Custodian and/or securities lending sub-agent will provide agreed upon indemnification to the System (the lender) from and against any losses, damages, costs and expenses which arise from a borrower defaulting on a loan or filing for bankruptcy. Upon notification of default by the Custodian, which shall be reported immediately to the CIO in writing, the Custodian shall take such actions as are prudent, necessary and appropriate to use

the collateral to acquire replacement securities of the exact same type and kind as the securities which were loaned to the borrower. Any inability to acquire such securities shall be reported to the CIO and Investment Manager immediately.

The Custodian and/or securities lending sub-agent is responsible for conducting all appropriate and necessary due diligence on the borrowers and potential borrowers. The Custodian shall propose loans of the System's securities only to borrowers meeting the Custodian's customary standards of creditworthiness. The Custodian shall formally review the creditworthiness of the borrowers approved by the System no less frequently than annually and shall remove any borrower no longer meeting the Custodian's customary standards of creditworthiness. The names of borrowers and potential borrowers shall be updated and provided to the CIO promptly following the end of each calendar quarter.

The Custodian shall be responsible for receiving acceptable cash and non-cash collateral (i.e., securities collateral), as defined in a separate Securities Lending Agreement, from any borrower to secure each securities loan. The purpose of the collateral is to cover the value of borrowed securities while the loan is in place. In the event a borrower defaults on its obligation to return securities upon request, the collateral exists to be liquidated by the lending agent and the proceeds used to purchase like securities in the open market.

The Custodian and/or securities lending sub-agent is responsible for ensuring that all loans are at least 102% collateralized for domestic securities and 105% collateralized for international securities. At the close of the market each day, the collateral shall be "marked to market," meaning that the market value of the loaned securities shall be determined, and if the market value of the collateral securing the loan is 100% or less of the market value of the respective loaned securities for that day, the borrower shall be required to deliver additional collateral to bring the value back to at least 102% for domestic securities and 105% for international securities, by the close of trading on the next business day. Cash collateral, for purposes of these collateral requirements, shall be valued at either the amount of cash deposited or the purchase price of the securities purchased with such cash. In no event shall the collateral be less than the total market value of loaned securities.<sup>28</sup>

Securities shall not be loaned in excess of forty percent (40%) of the market value of the System's assets (not on an individual manager account-by-account basis) under the care of the Custodian, marked to market on a day-to-day but not on an intra-day basis. In addition, the Custodian and/or securities lending sub-agent shall not loan out 100% of a specific security position and shall maintain at least one share of a specific security position and designate it as not available for loan in order for the System to act and participate on the merits of a corporate action, including proxy voting.

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<sup>28</sup> IC 5-10.2-2-13(d)

## **5.5 Cash Collateral Investment Guidelines**

### **5.5.1 Objectives and Structure of the Cash Collateral Reinvestment Program**

To the extent that the Custodian exercises discretionary authority with respect to the investment of cash collateral, the Custodian is a fiduciary with respect to the System in connection with such cash collateral investment activity. Cash collateral investments emphasize liquidity and principal preservation as prime objectives.

### **5.5.2 Permitted Investments**

In reinvesting cash received as collateral, including income received from such collateral, pursuant to the separate Securities Lending Agreement that indicates the approved investment types, credit quality, maturity, and liquidity, The Custodian shall be liable to the System for negligent acts and omissions resulting in damages to the System. Any securities acquired in violation of these Cash Collateral Investment Guidelines shall be sold no later than the day following detection, and the Custodian shall reimburse the System for any losses, while the System shall retain all gains from any violation.

### **5.5.3 Repurchase Transactions**

The Custodian, as agent for lender, and a counterparty may, under the terms of a repurchase agreement, conduct a transaction (a "Repurchase Transaction") pursuant to which the counterparty initially transfers securities to the Custodian (the "Purchased Securities"). If for any reason a counterparty to any Repurchase Transaction shall fail to redeliver to the Custodian the Repurchase Price (as defined in the applicable repurchase agreement), upon the termination of such Repurchase Transaction, the Custodian shall promptly sell the Purchased Securities in a commercially reasonable manner and immediately deposit the proceeds of such sale (the "Proceeds") to the cash collateral account. If the Proceeds are less than the Repurchase Price required to have been delivered by the Counterparty, the Custodian shall, at the Custodian's cost and expense, promptly deposit the amount of such difference to the cash collateral account.

### **5.5.4 Concentration of Collateral Investments**

A maximum of 25% of the cash collateral may be invested with a single counterparty; provided that there is no concentration limit with respect to U.S. Government Securities.

## **5.6 Monitoring**

The Custodian and/or securities lending sub-agent is responsible for reporting fully on all aspects of the securities lending program, including its operation and returns. The Custodian and/or securities lending sub-agent shall cooperate fully with all reasonable requests for documents and records made by the State of Indiana's State Board of Accounts and/or an independent certified public accountant selected and retained by the Board to audit securities lending activities.

The System shall receive a monthly report reflecting the loan transactions during the period and showing at least the following information:

1. The total fees paid by borrowers in loans of securities against securities collateral (the "Premiums"), and the percentage share of such Premiums credited to the System's account;
2. The total income earned on cash collateral investments (the "Yield"), the amount to be deducted there from as due from the System to the borrowers under the borrowing agreements (the "Rebate"), and the percentage share of the remaining earnings (Yield minus Rebate) credited to the System's account. All amounts credited to the System shall be shown on an Investment Manager-by-Investment Manager, fund-by-fund basis. In addition to the monthly report, significant events which require additional reporting shall include but not be limited to borrower list changes, failed trades due to securities on loan, and collateral shortfalls.

The CIO, on its own or through a Consultant, shall conduct an annual review of the securities lending program. At this time, the CIO will also survey the System's Investment Managers to ensure they have not encountered any problems with the securities lending program. If any problems are discovered, steps will be taken to resolve the issue(s) that are in the best interest of the System, which may include removal of certain Investment Managers from the program. If the program is out of compliance, Staff will notify the Board and take commercially reasonable steps to bring the program into full compliance with this policy.

## Addendum 6 Securities Litigation Policy

### 6.1 Statement of Intent

This securities litigation policy is established to provide a process for the monitoring of pending legal actions in which the System is a potential member of a plaintiff's class or otherwise possesses an independent right to a securities law claim. As a fiduciary, the System has a duty to monitor and evaluate such actions in which it may potentially be a member or participant. This policy contains the System's process and guidelines for evaluating the appropriate level of participation in securities litigation claims.

### 6.2 Identifying and Evaluation Potential Claims

Claims may generally be identified either by Staff, Custodian, Investment Managers, securities litigation monitoring firm(s) engaged by the System, or the class action bar. Staff will determine the most expedient method to identify claims in which the System has an interest. If the System may qualify to recover, further review by Staff (and evaluation counsel, if one is selected) will be undertaken to determine the System's level of participation. Such levels may include:

1. Participating as passive class member in class actions brought by others, and filing claims when action is settled/resolved;
2. Enhanced participation as class member in class actions brought and led by others, by considering objections or comments on settlements;
3. Active participation in class action litigation, including serving as a "lead plaintiff" pursuant to the Private Securities Litigation Reform Act; and
4. Opting out of the class action and pursuing separate litigation on behalf of the System.

In determining the level of participation, consideration will be given to the following factors:

1. Size of the System's damages measured by standards applicable to securities litigation;
2. Strength of claims, including evaluation of defenses;
3. Special circumstances which render the System's claims different from (stronger or weaker) than claims of typical class members;
4. Venue of litigation;
5. Availability of resources to pay a significant recovery (e.g., financial condition of target company, availability of insurance, multiple defendants such as auditors, underwriters, etc.);
6. Qualifications of other lead plaintiff candidates and their counsel, and likelihood the System would be selected a lead plaintiff;
7. Relations of claims to other corporate governance issues of special interest to the System's participants, and impact on other System holdings;
8. Potential for non-monetary remedies of special importance to the System which other class members/lead plaintiffs may not pursue;
9. Costs to the System of separate litigation/lead plaintiff status such as discovery, and Staff/Board time and resources needed to monitor litigation more actively; and
10. Whether the active involvement of the System will likely add value to the potential recovery or management of the case.

If, after reviewing these factors, Staff determines that additional examination is warranted and that the potential exists for the System to add significant value to the claim by actively participating, or opting out of a potential class of litigants and pursuing a claim independently, review of the potential claim may be referred to an evaluation counsel, in accordance with the process outlined below.

### **6.3 Evaluation Counsel**

If further evaluation is determined to be warranted, an evaluation counsel may be retained to perform additional due diligence regarding the claim. The System may retain evaluation counsel through the issuance of a request for proposal ("RFP") on a case-by-case basis, or by issuing an RFP that selects any number of firms to be subsequently used in individual cases when a referral to an evaluation counsel is determined to be warranted by Staff reviewing a case. Additional due diligence may include, without limitation: assessment of the complaint, SEC filings and company disclosures, contacts with other investors, consideration of non-litigation alternatives, and potential conflicts with other class members. The evaluation counsel will make a recommendation to the ED, the CIO, and the Chief Legal Counsel based upon their due diligence as to whether more active participation or opting out of a class action and pursuing a claim independently by the System would add significant value to any other options for recovery. Evaluation counsel may also be asked to evaluate settlements of class actions and recommend whether the System should object to, comment or opt out of a particular settlement. Evaluation counsel will not be eligible to serve as litigation counsel for the System on any matter they have evaluated for the System.

### **6.4 Staff Review and Consultation**

Following a review of the potential claim by Staff and receipt of the recommendation of the evaluation counsel (if applicable), in-house Legal Counsel will make a formal recommendation to the Executive Director for approval of INPRS's active involvement in a securities litigation claim.

### **6.5 Selection of Securities Litigation Counsel**

If the System pursues active involvement in a securities litigation claim, the System shall engage outside counsel to pursue such claims directly on its behalf. The Executive Director shall select the Legal Counsel that he/she deems best able to represent the System's interests in pursuing such action.

The System may determine it would be best to work with another institutional investor, so the Staff may recommend, and the Executive Director may conclude, that the most sensible and cost-effective source of legal representation will be the in-house counsel or the Legal Counsel representing such institutional investor.

### **6.6 Case Management**

The authority to settle, withdraw from or otherwise terminate a securities litigation matter initiated by the System pursuant to this Policy ultimately rests with the Board, but the Board hereby delegates such authority to the Executive Director.

The Board shall receive a quarterly report regarding the status of all securities litigation matters when such matters are currently under consideration and shall direct the Staff to prepare any securities litigation updates

## Addendum 7 Proxy Voting and Shareholder Engagement Policy

### 7.1 Introduction

The System is a significant equity investor in businesses around the world. The Board recognizes that the proxy voting and shareholder engagement rights appurtenant to such investments must be exercised consistent with the Board's fiduciary duties, including its duty not to allow System assets to be used for or diverted to any purpose other than the benefit of the System's members and beneficiaries. To comply with these duties, with respect to all such public equity investments, the Board may in its discretion choose either to retain the System's authority to exercise its proxy voting and shareholder engagement rights or to delegate this authority to other fiduciaries of the System, either to Service Providers retained by the System for this purpose or to the Investment Managers, retained by the System to buy, sell, or manage common stock. To the extent that a third-party is used by an Investment Manager for proxy voting or shareholder engagement, the Investment Manager must inform the System of the third-party and its exact responsibility.

### 7.2 Guidelines

In exercising the proxy voting authority and/or shareholder engagement authority delegated to it by the Board, each Service Provider is to exercise this authority exclusively for the financial benefit of shareholders, recognizing that all System assets are governed by the exclusive benefit rule of the Internal Revenue Code applicable to qualified plans, and must adhere to the requirements set forth in Section 8.2.6 of this Investment Policy Statement.

In accordance with Indiana law<sup>29</sup>, when voting proxies or conducting shareholder engagement, the Service Provider must act with the care, skill, prudence, and diligence of a prudent expert who is similarly situated and knowledgeable in the matters under consideration and must act solely for shareholders' financial benefit.

### 7.3 Reporting Requirements

These requirements of subsection 7.2 of this Addendum 7 above mandate that the Service Provider conduct an individual review and analysis of each proxy issue and/or each shareholder engagement issue prior to voting or conducting shareholder engagement. Such review and analysis shall be made available and disclosed to the Board upon request.

Additionally, each Service Provider that votes shares of common stock owned by the System or engages with issues with respect to such ownership will be required to document all such proxy voting decisions and engagements and report to the Investment Staff no less frequently than annually. The report shall include at a minimum the following:

1. A description of the process the Service Provider uses to ensure that reasonable steps have been taken to allow for the timely voting of all proxies on all stocks which are held as of the record date;
  2. The action and rationale taken on proxies, and if requested by the System, an explanation of how such vote conforms with this Policy, the relevant operative instruments and/or Indiana law, as applicable; and
  3. If requested by the System, a summary of all material issuer engagements, the substance of such engagements, and if further requested by the System, an explanation of how such engagement conforms with this Policy, the relevant operative instruments and/or Indiana law, as applicable.
- This subsection need not apply to engagements that do not constitute Nonfinancial Investment

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<sup>29</sup> IC 5-10.3-5-3, IC 5-10.4-3-10, IC 5-10.2-2-1.5

#### Activity.

In accordance with IC 5-10.2-14-13, each Service Provider shall provide at least annually to the System a report for public distribution of all proxy votes made on behalf of the System. For each vote reported, the report must contain:

- 1) A vote caption;
- 2) The fund's vote;
- 3) The recommendation of the portfolio company's management; and
- 4) If applicable, the recommendation of a proxy advisor or other service provider.

#### **7.4 Revocation of Voting Authority**

The CIO or ED may revoke the authority of a Service Provider to vote the shares of common stock held by presenting a written revocation of voting authority to the Investment Manager. This revocation may apply to an individual common stock or all common stocks managed by the Service Provider as deemed to be in the best interest of the System. Any actions taken will be reported to the Board at its next regular meeting.



## Addendum 8 Investment Information Disclosure Policy

In order to comply with the Access to Public Records Act (“APRA”)<sup>30</sup>, the Board hereby adopts this policy regarding disclosure of information pertaining to the System’s alternative investments (i.e., limited partnership interests in Private Markets funds, Real Assets funds, Absolute Return funds, and Risk Parity funds (individually, such entity, a “Partnership”)).

### 8.1 General Principles

The Board appreciates its public role as an independent body corporate and politic exercising its responsibility to be publicly accountable for its investment decisions. As a separate corporate body, the Board is required to comply with the public records provisions of APRA.

Generally, public records of the Board must be available for public disclosure. However, APRA prohibits disclosure of records that contain trade secrets<sup>31</sup> or confidential financial information<sup>32</sup> and exempts from disclosure records that are intra-agency or interagency advisory or deliberative material.<sup>33</sup> APRA provides that records containing trade secrets or confidential financial information may not be disclosed by a public agency unless specifically required by statute or under the rules of discovery.<sup>34</sup> Further, APRA provides that records considered intra-agency or interagency advisory or deliberative material shall be excepted from the disclosure requirements under APRA at the discretion of the public agency receiving such APRA disclosure request.<sup>35</sup>

### 8.2 Alternative Investment Disclosure Policy

Subject to the procedures and any other restrictions applicable under APRA, Staff is permitted to disclose any of the following information in response to a legitimate APRA request concerning alternative investments:

1. The name of the Partnership in which the System has made an investment;
2. The vintage of the Partnership (i.e., the year in which the initial investment was made or the year the Partnership first calls capital);
3. The amount of the System's total commitment to the Partnership;
4. The amount of the System's unfunded commitment;
5. Aggregate capital contributions and distributions to date resulting from the System's investment in the Partnership;
6. The overall size of the Partnership by committed capital;
7. The reported valuation of the System’s investment in the Partnership;
8. Quarter to date, year to date, one year, three year, five year, and inception to date internal rate of return (“IRR”) for each Partnership;
9. Inception to date investment multiple (“MOIC”) for each Partnership;
10. The dollar amount of the total management fees and costs paid on an annual fiscal year-end basis by the System to Partnerships in the aggregate for each applicable asset class; and
11. Other information expressly agreed by the System and Partnership to be disclosable.

In connection with the disclosure of the items listed above, the System is prohibited from agreeing to

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<sup>30</sup> IC 5-14-3-1, et seq.

<sup>31</sup> IC 5-14-3-4(a)(4)

<sup>32</sup> IC 5-14-3-4(a)(5)

<sup>33</sup> IC 5-14-3-4(b)(6)

<sup>34</sup> IC 5-14-3-4(a)(4) and (5)

<sup>35</sup> IC 5-14-3-4(b)(6)

any terms which would require the System to:

1. Notify the Partnership of any anticipated disclosure of such information (unless the information to be disclosed is not listed as a permitted disclosure above) pursuant to an APRA request;
2. Provide a legal opinion to the Partnership that disclosure of such information in response to an APRA request is required by law; or
3. Cooperate with the Partnership to prevent the disclosure of such information the System, in good faith, determines is not exempt from public disclosure under applicable law.

In order to comply with APRA's prohibition on disclosure of the records that contain trade secrets, the Board and Staff are expressly prohibited from disclosing any information on the Partnership's portfolio company investments and such portfolio company's individual performance contribution to the rate of return on a particular investment. All information disclosed shall be as of the last calendar date of the quarter prior to the quarter immediately ended.

## Addendum 9 Other Funds

### 9.1 Background

This Addendum is intended to assist the Board in managing the investment program established for the “Other Funds” administered by the System.

Special Death Benefit Fund<sup>36</sup>: Established by the General Assembly in 2015, this Fund allows police officer, firefighter, and emergency medical service (EMS) providers to enroll their employees for a special death benefit in the event of an in line-of-duty death. This benefit provides qualified enrolled employees within line-of-duty death coverage. If a covered employee dies while on duty, his or her elected survivors or beneficiaries will receive the benefit to use for burial, cremation, or other necessary purposes.

Local Public Safety Pension Relief Fund<sup>37</sup>: Designed to relieve cities and towns from some of the liability for benefit payments under the 1925 Police Fund, the 1937 Firefighters Fund and the 1953 Police Fund, and is funded through state and local sources. The Local Public Safety Pension Relief Fund may be commingled with other Funds assets for investment purposes.

Retirement Medical Benefits Account Plan<sup>38</sup>: Designed to reimburse certain qualifying medical expenses in which eligible retirees, their spouses and dependent children incur. The Plan only funds benefits for sickness, accident, hospitalization, and medical expenses to eligible retirees on a pre-tax basis. Active employees or participants are not entitled to receive reimbursements for certain qualified medical benefits under this Plan.

Supplemental Reserve Accounts (“SRAs”)<sup>39</sup>: SRAs were established for the purpose of paying postretirement benefits increases, thirteenth checks, and other benefit charges or adjustments granted by the general assembly after June 30, 2018. The following funds have an associated SRA:

1. Public Employees’ Defined Benefit Account
2. Teachers’ Pre-1996 Defined Benefit Account
3. Teachers’ 1996 Defined Benefit Account
4. Excise, Gaming and Conservation Officers’ Retirement Fund
5. Legislators’ Defined Benefit Fund

Except for Section 6 (Asset Allocation), the investment of the Other Funds remains subject to the other guidelines and requirements found in this Policy.

### 9.2 Asset Allocation

An asset allocation will be set for the Other Funds that is consistent with the liquidity needs of the investment funds and corresponding liabilities that the assets support. For all situations in which the assets will be utilized on a short-term basis, the investments will be held in a portfolio of high-quality, fixed income assets. Additional asset classes, such as public equities, may be utilized to enhance expected asset returns whenever the investable assets will be held for a significant period of time before disbursement. Other Funds may pursue an asset allocation that is consistent with the Defined Benefit Retirement Funds’ asset allocation if Investment Staff determines that the Defined Benefit Retirement Funds’ allocation is suitable for an Other Fund based on its liquidity needs and return objectives.

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<sup>36</sup> IC 5-10-9.8-1 et seq., 5-10-10-1 et seq.

<sup>37</sup> IC 5-10.3-11-1 et seq.

<sup>38</sup> IC 5-10-8.5-0.1 et seq.

<sup>39</sup> IC 5-10.2-12-1, et seq.

Investment Staff will be responsible for balancing the funds liquidity needs and return objectives.

## Addendum 10 Placement Agent Disclosure Policy and Procedures

### 10.1 Introduction

The System requires complete and timely disclosure of all agreements or other arrangements by the System's Investment Managers in connection with their use, if any, of Placement Agents with respect to the System's investment and other business activity.

### 10.2 Definitions

All capitalized terms not defined herein shall have the meanings ascribed to such terms in the System's Investment Policy Statement effective January 1, 2012, as the same may be amended from time to time.

1. Benefit – Any actual or proposed fee (regardless of whether it is a flat fee, a contingent fee, a percentage fee, etc.), commission, retainer, economic benefit or other consideration or benefit, to be paid, provided, or given to a Placement Agent or its designee that is or will be paid, provided, or given with respect to any Investment.
2. Investment Manager – A person or entity that manages Investments and all individuals or entities, regardless of legal form, affiliated with such person or entity. The term "Investment Manager" does not include any employee of the System or of the State of Indiana whose responsibilities include managing the System's investments.
3. Investment(s) – Any actual or proposed investment or commitment to invest made by the System and/or its Retirement Funds, including, without limitation, investments or commitments to invest in investment funds, real estate, real property assets, or securities, or the establishment of a managed account or separate account with respect to which the Investment Manager has investment discretion.
4. Placement Agent – An individual or entity, regardless of legal form, that directly or indirectly through one or more intermediaries, contracts with, is engaged or retained by, or represents or otherwise acts with or on behalf of, an Investment Manager to market, solicit, assist, facilitate or seek to secure an Investment in exchange for a Benefit, where such individual or entity is not an employee of the Investment Manager. The term "Placement Agent" does not include attorneys, actuaries, accountants, financial analysts, or economists under contract with the Investment Manager to provide their respective professional services.
5. Policy – This Placement Agent Disclosure Policy and Procedures.

### 10.3 Policy Application and Compliance

The Executive Director shall have discretion to determine the application and interpretation of, and compliance with, this Policy including, but not limited to, whether there has been a material misstatement or omission in any Disclosure Letter or Closing Disclosure.

### 10.4 Disclosure and Compliance Requirements

1. Staff or the Consultant shall provide each prospective Investment Manager with a copy of this Policy prior to the commencement of the System's full due-diligence review of any potential Investment.
2. The Investment Manager shall provide a letter signed by an appropriate senior executive and addressed to the System that provides accurate and complete disclosure with respect to the matters specified in **EXHIBIT A**, attached hereto (the "Disclosure Letter"). The Disclosure Letter must be provided to the System prior to the System's completion of its due-diligence review of any potential Investment.

3. At the final closing of the Investment, the Investment Manager must either (1) restate its previously submitted Disclosure Letter, (2) certify that its previously submitted Disclosure Letter contains no material inaccuracies or omissions, or (3) submit a revised Disclosure Letter (such as restated Disclosure Letter, certification, or revised Disclosure Letter, the "Closing Disclosure").
4. Staff shall include the original Disclosure Letter and the Closing Disclosure as an essential part of the closing record in the file with other documents related to the Investment.
5. In the event it is discovered that the Investment Manager knew or should have known about any material omission or inaccuracy in the Disclosure Letter or in the Closing Disclosure or about any other violation of this Policy, the Investment Manager shall provide the System's CIO with written notice within five (5) days. The foregoing provision will apply to the Disclosure Letter and the Closing Disclosure in the form and substance they were provided as of the dates they were each provided based on the facts and circumstances at such time, *i.e.*, there is no continuing obligation to update the Disclosure Letter or the Closing Disclosure with respect to events that occur subsequent to such dates.

### **10.5 System Remedies**

In the event that the Investment Manager fails to comply with this Policy or makes a material misstatement or omission in the Disclosure Letter or in the Closing Disclosure, the System shall have the option in its sole discretion to exercise at any time any or all of the following remedies, to the extent applicable to such Investment: (1) be reimbursed by the Investment Manager for any management or advisory fees paid by the System to the Investment Manager or any of its affiliates or designees for the prior two years in connection with the Investment; (2) be reimbursed by the Investment Manager an amount equal to the Benefit paid or promised to be paid to the Placement Agent in connection with the Investment; and/or (3) terminate without liability or penalty the System's investment relationship with the Investment Manager, which may involve termination of any contract or agreement with the Investment Manager, withdrawing from the applicable investment vehicle, terminating the obligation of the System to pay any fees or make any capital contributions with respect to the applicable investment vehicle and terminating the right of the applicable investment vehicle to withhold and apply amounts retained by such investment vehicle for the account of the System.

**EXHIBIT A****TO ADDENDUM 11 PLACEMENT AGENT DISCLOSURE POLICIES AND PROCEDURES****Disclosure Letter and Closing Disclosure Requirements**

An Investment Manager's Disclosure Letter and Closing Disclosure shall, with respect to each Investment, contain the following:

**A.** If a Placement Agent was not used in connection with the Investment or in obtaining, or seeking to obtain, a business relationship with the System: A representation that to the best of its knowledge the Investment Manager did not utilize a Placement Agent to assist the Investment Manager in connection with the Investment or in obtaining, or seeking to obtain, a business relationship with the System.

**B.** If a Placement Agent was used in connection with the Investment or in obtaining, or seeking to obtain, a business relationship with the System:

1. Identification of the Placement Agent and of all natural persons employed, hired, engaged or retained by, or otherwise affiliated (including, but not limited to, third party contractors, advisors and consultants) with, the Placement Agent, who provided services in connection with the Investment;
2. A description of the services to be performed, or that are currently being performed by, the Placement Agent, and a statement whether the Placement Agent is utilized with all prospective investors or with a subset of prospective investors (*e.g.*, public pension funds, pension funds within a certain geographic area, etc.);
3. A description of the value, timing, and nature of any compensation or other Benefits provided or to be provided either directly or indirectly to the Placement Agent by the Investment Manager in connection with the Investment;
4. A statement whether the Placement Agent, or any of its affiliates, is required to be registered or is in fact registered (i) with one or more regulatory or self-regulatory bodies and/or (ii) as a lobbyist with any state or federal governmental body, and confirmation of such registration if so required.
5. A statement whether the Placement Agent (or any of its affiliates, if applicable), has been subject to any disciplinary actions, fines, suspensions of registration, or other material investigations or sanctions by one or more regulatory or self-regulatory bodies (*e.g.*, SEC, FINRA, or state regulators) or by any state or federal governmental body and, if so, a statement providing details of such events.

**C.** A representation that the Disclosure Letter or Closing Disclosure contains no material inaccuracies or omissions.

**D.** An acknowledgment and agreement that the System may publicly disclose any information contained in the Disclosure Letter or the Closing Disclosure as required under the Indiana Access to Public Records Act.

**E.** An agreement to comply with this Policy including, but not limited to, the System's exercise of the remedies described herein and to provide any further information or documents as may be requested by the System in connection with this Policy.