

STATE OF VERMONT
OFFICE OF THE STATE TREASURER
SHORT-TERM INVESTMENT GUIDELINES

Adopted June 30, 2000
Revised August 1, 2004
Revised November 1, 2004
Revised February 25, 2005
Revised April 9, 2007
Revised June 3, 2008
Revised May 2, 2011
Revised July 22, 2022

Objectives

The statutory guidelines for permissible investments are cited in Title 32 Section 433 of Vermont state law. All investments must fall within the broad categories as outlined in Section 433. In addition, the statute also states:

“(b) Investments of state funds shall be made with judgment and care, under circumstances then prevailing, which persons of prudence, discretion and intelligence exercise in the management of their own affairs, not for speculation, but for investment, considering the probable safety of their capital as well as the probable income to be derived.” and

"(c) Investments of state funds shall be made in accordance with written guidelines adopted by the treasurer. Such guidelines shall address liquidity, diversification, safety of principal, yield, maturity and quality and capability of investment management, with primary emphasis on safety and liquidity."

These written investment guidelines have the following objectives (in order of importance): (1) to preserve the principal of the invested funds; (2) to provide sufficient liquidity to meet anticipated cash needs; and (3) to maximize the return on investments subject to guideline restraints.

Definition of Short-Term Investments

Short-term investments consist of any cash, publicly traded investment grade securities, or any other investments as described in these guidelines or state law. These securities, supplemented by ongoing cash flow, should be available to pay claims and other expenses coming due within one year. At all times, the need for satisfactory yield levels will be superseded by protection of the principal and the potential need of the State of Vermont for liquidity.

Eligible Short-Term Investments

- a. All U. S. Government securities backed by the "full faith and credit" of the United States, its agencies and instrumentalities; fully collateralized repurchase agreements whose underlying collateral consists of such obligations or other eligible money market instruments;

- b. Certificates of deposit or other evidences of deposit at banks and savings and loan associations approved by the Treasurer. The level of collateralization will be determined by the Office of the State Treasurer based on a quarterly review of bank financial data, regulatory capital, and ratings from nationally recognized independent rating firms. Where collateral is required, it will consist of US Government and/or Agency securities, Vermont Municipal Notes, or other collateral acceptable to the Office of the State Treasurer. In those cases of collateralization, the institution holding the securities must segregate the collateral in a separate trust or a Federal Reserve account. No commingling of collateral with other assets of the institution is allowed. The full amount of FDIC guarantee can be used as a portion of the collateral requirements.
- c. Prime bankers' acceptances, which shall mean bankers' acceptances that are eligible for purchase by the Federal Reserve System, and trade in an active secondary market.
- d. First Tier commercial paper, which shall mean commercial paper of "A" quality as defined by two nationally recognized statistical rating organizations that rate such securities. Preference will be given to commercial paper with an A1+/P1/F-1+ ratings, however A1/P1/F-1 (two of three) rated paper is permissible. The long-term rating of the issuer's debt must be "A" or better. All permissible commercial paper must trade in an active secondary market.
- e. Tax-exempt securities exempt from federal arbitrage provisions applicable to investment of proceeds of this state's tax-exempt debt obligations.
- f. Money market mutual funds that either are regulated by the securities and exchange commission and whose portfolios consist only of dollar- denominated securities or are managed in a manner consistent with Rule 2a-7 of the Investment Company Act of 1940.

Prohibited Investments

Investments that are exceptions to these guidelines may not be purchased. The following investments are specifically prohibited:

- a. Derivative securities;
- b. Real estate, direct mortgages or real estate investment trusts;
- c. Commodities;
- d. Short sales and margin purchases;
- e. Oil, gas, mineral, or other types of leases;
- f. Common stock;
- g. Structured notes.

Communications/Notification

The institution which holds the State of Vermont's investments will provide the Treasurer's office with reports on account investment activity as well as collateralization levels, if collateral is required. The institution will periodically report to the Treasurer's office to ensure that investments meet the investment guidelines. In the event of a ratings downgrade below the minimum acceptable

quality level stated herein, the institution from which the State has purchased the investment shall contact the Treasurer's office immediately. The investment will be liquidated as quickly as possible without unduly jeopardizing the principal.

Performance Measurement

The following benchmarks will be used in evaluating short-term investment performance:

- a. the average daily Federal Funds Rate for the period of investment, or
- b. the average three-month U.S. Treasury Bill Auction Rate for the equivalent period.

Regulatory Compliance

The investments of the State of Vermont will be managed in compliance with investment statutes for the State of Vermont and any rules or regulations thereof. The burden for understanding laws, rules, or regulations falls upon the institution participating in the State of Vermont's short-term investment program.

Maturity

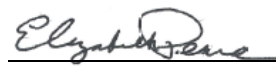
Short-term investments, supplemented by ongoing cash flow, should be available to pay claims and other expenses coming due within one year. At all times, the need for satisfactory yield levels will be superseded by protection of the principal and the potential need of the State of Vermont for liquidity.

Diversification

Maximum in U.S. Government Securities	100% of portfolio	100% of portfolio
Maximum in U.S. Government Agency Securities		100% of portfolio
Maximum in Prime Commercial Paper		75% of portfolio
Maximum in Certificates of Deposit (excludes Bank in Vermont)		75% of portfolio
Maximum in Negotiable Certificates of Deposit		25% of portfolio
Maximum in Government Security collateralized Repurchase Agreements		100% of portfolio
Maximum in Prime Bankers' Acceptances		25% of portfolio
Maximum in Money Market Funds		No total limit; maximum 50% in any one non- governmental fund
Maximum in Bank in Vermont Program		\$150 million

Maximum 25% in one industry, maximum 10% in any one issuer of commercial paper, corporate securities, or bankers' acceptances.

Approved:



Elizabeth A. Pearce
State Treasurer

07/22/22
Date State