

EXHIBIT A

IOWA DEPARTMENT OF PUBLIC SAFETY
PEACE OFFICERS' RETIREMENT, ACCIDENT AND DISABILITY SYSTEM

INVESTMENT POLICY

APPROVED BY THE BOARD OF TRUSTEES

May 16, 2006

POLICY PURPOSE STATEMENT

The purpose of this investment policy is to set standards for the direction, operation, management and oversight of the investment of the funds of the Iowa Department of Public Safety Peace Officers' Retirement, Accident and Disability System. This policy will be reviewed annually or as circumstances warrant, and adopted by the Board of Trustees who shall approve a policy by majority vote and shall evidence their approval in writing.

INDEX

POLICY PURPOSE STATEMENT	2
INDEX	3-4
IOWA CODE CITATIONS	5
I. <u>DEFINITIONS</u>	6-8
II. <u>INVESTMENT AUTHORITY</u>	
A. DESCRIPTION OF FUND	9
B. APPLICABLE LAW	9
1. Grant of Authority	9
2. Statutory Investments and Constraints on Investments	9
C. FUND INVESTMENT, MANAGEMENT AND OVERSIGHT	9
1. Responsible Persons	9
2. Reporting and Communication	13
3. Policy Recommendations	15
III. <u>INVESTMENT OBJECTIVES</u>	
A. STATEMENT OF OBJECTIVES	15
1. Safety of Principal	15
2. Real Growth	15
3. Liquidity	15
4. Cost-Effective Management	16
B. INVESTMENTS PERMITTED	16
1. Stocks	16
2. Fixed Income	16
3. Cash Equivalents	17
4. No-Load Mutual Funds or Pooled Funds	17
5. Use of Futures, Options and Forward Contracts	17

C. RISK TOLERANCE / AVOIDANCE	17
1. Prohibited Investments	17
2. Broker-Dealer Selection / Credit Risk	17
3. Issuer Quality / Default Risk	18
4. Diversification / Limiting Exposure to Risk	18
5. Investment Strategies / Trading Risks	18
D. RETURN ON INVESTMENT / TOTAL FUND PERFORMANCE STANDARDS	19
1. Targeted Rate of Return	19
2. Allocation Index	19
3. Comparison to Other Funds	19
4. Risk Adjusted Total Rate of Return	19
5. Standard Deviation of Returns Limit	19
6. Investment Manager Performance Standards	20
7. Turnover	20
E. PROXIES AND CORPORATE ACTIONS	20
1. Proxies	20
2. Corporate Actions	21
F. ADMINISTRATION OF INVESTMENTS	21
1. Custody	21
2. Transaction Settlement	21
3. Brokerage Services	21
G. GOALS OF ADMINISTRATION	22
1. No Conflict of Interest	22
2. Personnel, Procedures and Practices	22
IV. APPENDIX A	
1. Investment Managers' Benchmarks	

IOWA CODE CITATIONS

IOWA CODE

Chapter 97A	IOWA DEPARTMENT OF PUBLIC SAFETY PEACE OFFICERS' RETIREMENT, ACCIDENT AND DISABILITY SYSTEM
Chapter 97B	ACCEPTABLE INVESTMENTS
Chapter 12C	LOCATION OF DEPOSITORIES

I. DEFINITIONS

Actuarial Return Assumption Rate shall mean the long-term assumed rate of return on Fund investments used by the actuary to estimate present and future costs of the Fund.

Allocation Index shall mean a custom index constructed as follows: The proportionate weighting of the asset classes of all Fund investments shall be multiplied by the returns for the applicable benchmark index (specified in the investment guidelines for each Investment Manager) for each component investment (for example, the return on the S&P 500 Index would be multiplied by the percentage of the Fund invested in large capitalization domestic stocks) and then summing the weighted rates of return to arrive at the Allocation Index return.

American Depositary Receipt (ADR) shall mean a receipt for the shares of a foreign-based corporation held in the vault of a United States bank which entitles the shareholder to all dividends and capital gains. Instead of buying shares of foreign-based companies in overseas markets, Americans can buy shares in the United States in the form of an ADR.

Capitalization shall mean the product of the market price of a company's stock and the number of common shares outstanding.

Cash Equivalents shall mean short term investments that are highly liquid and safe. An investment shall be considered a cash equivalent if it is purchased with less than one year remaining to maturity.

Defined Benefit Pension Plan shall mean a plan that pays a specific level of benefits to the Participants in the plan and uses a formula based on length of services and level of benefit compensation in determining benefits paid to Participants.

Employer shall mean the State of Iowa.

Eurodollar Bond shall mean a bond that has been issued outside of the U.S. and that pays interest and principal in U.S. dollars. Such bonds may be issued by a U.S. or foreign multinational corporation or a foreign government or agency. Eurodollar bonds are evaluated and rated by rating agencies, but are not registered with the Securities and Exchange Commission.

Fixed Income Security shall mean a security that pays or accrues a fixed rate of interest on specific dates, and pays principal at maturity. It shall also mean a security that pays a variable amount of interest and principal on specific dates prior to, and including at, maturity.

Fund shall mean moneys deposited by the Participants the Employer for future claims for benefits by Participants or beneficiaries of the Iowa Department of Public Safety Peace Officers' Retirement, Accident and Disability System.

Investment Consultant shall mean the person or firm hired by the Board to provide investment consulting services to the Fund.

Investment Manager shall mean the person or company investing Fund moneys.

Lehman Brothers Aggregate Bond Index is the benchmark for the domestic fixed income manager and shall mean the market value-weighted price index which is representative of the broad domestic fixed income market, being comprised of government and agency securities, corporates, mortgages, and asset-backed securities. Each issue in the index has at least one year to maturity and at least \$1 million par amount outstanding.

Market Cycle shall mean the period of time in which a decline and rise or a rise and decline occur in the quarterly rates of return of the S&P 500 Index. A decline occurs when the S&P 500 Index quarterly rate of return is negative or unchanged for at least two (2) consecutive quarters. A rise occurs when the S&P 500 Index quarterly rate of return is positive or unchanged for at least two (2) consecutive quarters.

Morgan Stanley Capital International Europe, Australia, Far East (EAFE) Index is the benchmark for the international equities manager and shall mean the international equity index established by Morgan Stanley Capital composed of a basket of stocks from nineteen countries. The relative weight of each country in the index is determined by the country's total equity market capitalization as a percentage of the total market capitalization of the nineteen countries.

Mutual Fund shall mean a fund operated by an investment company established under the Investment Company Act of 1940 that raises money from shareholders and invests it in stocks, bonds, or other instruments specified in the prospectus for the mutual fund.

NAREIT is the National Association of Real Estate Investment Trusts. It is a trade organization that publishes information and performance data related to REITs. Members are REITs and listed companies that own, operate and finance income-producing real estate, as well as those firms and individuals who advise, study and service these businesses. This data can also be useful to real estate investors as a proxy for the current attractiveness of specific real estate sectors.

NCREIF is the National Council of Real Estate Investment Fiduciaries. It is a non profit industry group that computes and publishes the NACREIF National Property Index(NPI). The index is based on a weighted average total return on institutional properties reported by the members. Equity and leveraged properties are included but all are reported on an unleveraged basis. Apartments, hotels, industrial, office and retail properties with market values based on quarterly appraisals are included. NACREIF sets valuation and standards for inclusion to replicate the broad direct property ownership market.

Ninety-one Day Treasury Bill Return shall mean the total rate of return for the Merrill Lynch 90-day U.S. Treasury Bill Index.

Participants shall mean peace officers of the Iowa Department of Public Safety as named in Code of Iowa section 97A.3.

Performance Universes shall mean the statistical universes recommended by the investment consultant and approved by the Treasurer for the purposes of comparing the performance of portfolio managers for relevant equity and fixed income styles (e.g., small cap value, international equity).

Pooled Fund shall mean an investment vehicle which has the objective of investing the commingled assets of several ERISA-qualified participants for the purpose of achieving greater diversification, lower costs, and hopefully a higher rate of return than each participant could get on their own. A Pooled Fund may also be known as a “commingled fund.”

Restricted Stock shall mean stock which may be issued only on the proviso that no dividends are paid on it until certain earnings or other criteria are met. It shall also refer to shares which cannot be sold either because they were acquired in an acquisition or a private placement.

Russell Stock indices are published total return data series based on capitalization and investment style breakouts of the 3000 largest stocks across the NY , American and NASDAQ exchanges.

Sharpe Ratio shall mean the ratio of annualized excess return (defined as the nominal rate of return minus the risk free return) to the standard deviation of the return.

Short Term Trading shall mean buying and selling securities with a view toward holding such securities for less than a one-year term.

Standard Deviation shall mean the statistical measure of the degree to which an individual value in a probability distribution tends to vary from the mean of the distribution.

Standard and Poor’s 500 Index (S&P 500 Index) is the benchmark for the large capitalization domestic equities manager and shall mean the capitalization weighted index showing the change in the total market value of five hundred (500) stocks as selected by Standard and Poor’s Corporation. The index represents about eighty percent (80%) of the market value of all issues traded on the New York Stock Exchange. The index is made up of 400 industrial stocks, 60 transportation and utility stocks, and 40 financial stocks.

Stock shall mean ownership interest in a corporation represented by shares that are a claim on the corporation’s earnings and assets.

Total Rate of Return shall mean the annualized rate of return measured over a specific period. The rate of return includes the total realized and unrealized gains, dividend and interest income and reinvested income from dividends and interest, minus realized and unrealized losses.

Unregistered Stock shall mean a stock that is not registered with the Securities and Exchange Commission and therefore cannot be sold in the public market.

Wilshire Small Cap Value Equities Index is the benchmark for the Fund’s small capitalization value style domestic equities manager and shall mean the Index constructed and published by

Wilshire Associates Inc. which measures the total rate of return of small cap value stocks in the Wilshire universe of domestic equities.

Yankee Bonds shall mean dollar-denominated bonds issued in the United States by foreign banks and corporations.

II. INVESTMENT AUTHORITY

A. DESCRIPTION OF FUND The Iowa Department of Public Safety Peace Officers' Retirement, Accident and Disability System is a defined benefit pension plan maintained to provide retirement, accident, and disability benefits to Participants in accordance with the Code of Iowa. Such Participants include peace officers of the Iowa Department of Public Safety as named in the Code of Iowa section 97A.3.

B. APPLICABLE LAW

1. Grant of Authority Iowa Code section 97A.2 creates the Iowa Department of Public Safety Peace Officers' Retirement, Accident and Disability System (PORS). The Board of Trustees administers the PORS Fund and has full power and authority to invest and reinvest Fund moneys as directed in Iowa Code section 97A.7.
2. Statutory Investments and Constraints on Investment Statutorily authorized investments are those specified under Iowa Code section 97B.

C. FUND INVESTMENT, MANAGEMENT AND OVERSIGHT

1. Responsible Persons

a. Board of Trustees The Board of Trustees (the "Board") directs the administration of the Fund. The Board consists of the Commissioner of Public Safety, as chairperson, the Treasurer of State (the "Treasurer"), actively engaged member of the system elected by the members through secret ballot, a retired member of the system elected by the retired members through secret ballot, and a person appointed by the governor who is an executive of an insurance company, bank, or financial services firm and subject to confirmation by the senate.

1) The Board shall, as specified by law:

- a) adopt actuarial mortality tables (Sec. 97A.5(11)a)
- b) certify benefit funding requirements of the Fund (Sec. 97A.5(11)b) through reviewing:
 - (1) expected benefit payout to Participants; and
 - (2) actuarial recommendations regarding the necessary Employer contributions
- c) approve the assumed investment return necessary to meet funding requirements (actuarial return assumption rate) (Sec. 97A.5(11)a);

- d) biennially report to the state legislature the fiscal transactions of the Fund for the preceding biennium, the amount of the accumulated cash and securities of the Fund, and the last balance sheet showing the financial condition of the Fund by means of an actuarial valuation of the assets and liabilities of the system (Sec. 97A.5(6));
 - e) report the investment management expenses for the fiscal year as a percent of the market value of the Fund (Sec. 97A.8(3)); and
 - f) establish rules from time to time for the administration of the Fund and the transaction of business (Sec. 97A.5(4)).
- 2) The Board shall, as specified below:
- a) Hire an actuary to study the Fund and recommend contribution levels;
 - b) approve acceptable investments for Fund moneys;
 - c) approve total Fund investment asset allocation targets
 - d) Hire one or more investment management consultants for support in performance review, investment manager selection and evaluation, asset allocation recommendations or as otherwise deemed necessary;
 - e) hire investment managers and give full discretion to the investment managers to manage the investment and reinvestment of assets;
 - f) empower investment managers to vote proxies and execute corporate actions consistent with policy directives herein;
 - g) obtain written contracts with each investment manager hired by the Board for the Fund;
 - h) review any and all Fund investment manager performance on a quarterly basis;
 - i) evaluate total Fund performance and investment manager performance in context with the standards of performance established herein and under the investment manager guidelines on an annual basis;
 - j) take corrective action when an investment manager fails to perform in accordance with the standards established herein or the requirements of the applicable investment manager guidelines; and
 - k) review, modify and approve the Fund investment policy and the investment manager guidelines annually or as circumstances dictate.

3) The Board may:

- a) authorize the Treasurer to exercise any duties of section 97A.7. When so authorized the Treasurer shall report any transactions to the Board at its next monthly meeting (Sec. 97A.7(1)); and
- b) authorize the use of a securities lending program for the Fund and execute any agreements or documents necessary to implement such a program.

b. Treasurer of State

1) The Treasurer shall, as specified by law:

- a) obtain custodial safekeeping of Fund assets, verify delivery and receipt of Fund assets and the collection of Fund income (Sec. 97A.7(3)); and
- b) maintain the investment accounting records for the Fund (Sec. 97A.5(5)).

2) The Treasurer shall, as directed by the Board:

- a) study and recommend acceptable investments;
- b) interview and recommend investment managers to invest Fund moneys;
- c) develop and recommend investment objectives, investment manager guidelines, asset allocation targets and performance measurement standards based on funding requirements;
- d) deploy existing assets and new moneys to the investment managers;
- e) monitor investment manager compliance with the Fund investment policy and the investment manager guidelines on a monthly basis;
- f) recommend corrective action when an investment manager fails to perform in accordance with the investment policy and the investment manager guidelines;
- g) resolve proxy voting instruction conflicts with the investment managers; and
- h) provide quarterly performance and compliance reports to the Board.

c. Investment Managers

The investment managers shall, as specified below:

- 1) possess the necessary expertise and specialized research facilities to invest Fund moneys prudently; and
- 2) contract in writing with the Board to adhere to the Fund investment policy and the applicable investment manager guidelines.

d. Providers of Mutual Fund or Pooled Funds

As the Board will have no say in the particular investment policies of any pooled funds or mutual funds used in the Fund's investment structure, the broad guidelines outlined below will govern the Fund's retention of appropriate providers.

1) Aggregate Assets

Each fund provider shall maintain a threshold level of aggregate assets (including both the assets in the pool or fund and any separate account assets managed similarly) sufficient to ensure broad diversification, efficient trading, and economies of scale in administrative expenses and transaction costs. Each fund provider shall not exceed a level of aggregate assets (including both the assets in the pool or fund and any separate account assets managed similarly) where the size would cause the asset manager to deviate from the portfolio construction methods upon which the performance record was built.

2) Personnel

Each fund provider shall ensure the stability of personnel, thereby encouraging consistency of investment method.

3) Expenses

Each fund provider shall control both management fees and administrative expenses to ensure that total expenses are within normal and customary tolerances.

4) Portfolio Characteristics

Each fund provider shall maintain portfolio characteristics consistent with historical patterns as presented to the Board and the Treasurer at the time of hiring. Deviations from expectations will occasion a review of the fund's continued appropriateness in the Fund's investment structure.

e. Investment Consultants The investment consultant shall, as specified below:

- 1) possess the necessary expertise and facilities to assist the Board in the oversight of investment of Fund moneys;
- 2) act as a fiduciary for the services provided;
- 3) provide annual performance and attribution reports for each Investment Manager and the Fund to the Board no later than forty-five (45) days following the end of the fiscal year;
- 4) provide other investment support services as required by the Board; and
- 5) contract in writing with the Board or Treasurer for services provided.

f. Actuary

The actuary hired by the Board shall analyze mortality, service and compensation experience of the Fund Participants. The actuary shall prepare estimates of contribution levels for the Fund.

2. Reporting and Communication

a. Reporting Investment Activity to the Board

- 1) Each investment manager or designated representative of firms providing mutual fund or pooled fund vehicles shall appear before the Treasurer and report on investment activity at least annually. The report shall specifically include:
 - a) asset class returns;
 - b) anticipated portfolio strategy for the upcoming fiscal year;
 - c) economic indicators and trends; and/or
 - d) financial market conditions
- 2) Each investment manager or designated representative of firms providing mutual fund or pooled fund vehicles shall furnish Uniform Application for Investment Advisor Registration – Form ADV Parts I and II to the Treasurer annually, or immediately upon substantial revision. For firms wholly or partially owned by banks, or for firms otherwise not required to file a Form ADV, a mutually agreeable substitute for the Form ADV will be provided by the investment manager.

- 3) Each investment manager or designated representative of firms providing mutual fund or pooled fund vehicles shall provide copies of all reports or documents to be used at any meeting regarding the investment activities and/or performance of the account or fund at least three (3) business days in advance of such meeting or conference. Such documents shall be provided to expected meeting participants whether the Board, Treasurer's staff members, or both.

b. Communication of Material matter by the Investment Manager to the Board

Each investment manager or designated representative of firms providing mutual fund or pooled fund vehicles is responsible for frequent and open communication with the Board on all material matters pertaining to the investment of the Fund's assets including, but not limited to, changes affecting investment values and changes affecting financial condition, personnel and procedures of the investment manager or fund provider. As a matter of course, each investment manager will notify the Treasurer of any involvement in any litigation or regulatory investigation.

- 1) Investment changes shall include major changes in the investment manager's or fund provider's investment outlook, investment strategy and portfolio structure.
- 2) Organization changes shall include involvement in any litigation, investigation by any regulatory agency, or any material changes in ownership, organizational structure or financial condition, and senior personnel staffing of the organization.

c. Reporting Investment Activity to the Treasurer

Each investment manager or designated representative of a firm providing mutual fund or pooled fund vehicles shall provide the following reports to the Treasurer:

- 1) Monthly reports shall be provided to the Treasurer. The monthly report shall include the following:
 - a) security name and CUSIP number (if CUSIP is available);
 - b) par value or number of shares;
 - c) cost;
 - d) market value;
 - e) percent of total market value that the market value of each security represents;
 - f) current yield; and
 - g) bond credit rating (if applicable)

- 2) Quarterly reports shall be provided by each investment manager or designated representative of a firm providing mutual fund or pooled fund vehicles to the Treasurer. The quarterly report shall summarize proxy voting information. The report shall include the security name and a summary of each issue presented for vote and the vote decision. The quarterly report shall also include a summary of each purchase and sale made during the quarter.
- 3) Upon request, the Investment Manager will report to the Treasurer on the selection and performance of the brokers and dealers used to execute transactions.

3. Policy Recommendations

The investment managers and the investment consultant shall recommend changes of policy when deemed necessary.

III. INVESTMENT OBJECTIVES

A. STATEMENT OF OBJECTIVES

An investment manager shall not purchase an investment, or practice any procedure not authorized under the terms of this document and the investment manager guidelines. Assets of the Fund shall be invested consistent with the goals and needs of the Fund which are the following:

1. Safety of Principal

The main objective is to make sure that the Fund has assets sufficient to meet the long-term benefit obligations of the System. A major goal of the Fund investing shall be safety of principal in order to preserve assets sufficient to meet the benefit obligations of the system. The principal amount of the assets may decline in the short term, but should be maintained over a three (3) to five (5) year period of investment or a market cycle.

2. Real Growth

Primary investment emphasis shall be placed upon consistency of real growth over time in order to help maintain the purchasing power of the benefits.

3. Liquidity

Sufficient liquidity shall be maintained to fund benefit payment outflows.

4. Cost-Effective Management

The investments of the Fund shall be managed in an efficient and cost-effective manner.

B. INVESTMENTS PERMITTED

Under this policy, moneys of the Fund may be invested as follows:

1. Stocks

Stock investments may include common stocks, American Depositary Receipts, or issued convertible into common stock.

No more than 4.9% of outstanding issues in a given security class may be purchased.

2. Fixed Income

Fixed income securities may include securities issued by :

- a. the United States or foreign governments or their agencies and instrumentalities;
- b. domestic or foreign corporations (including industrials, utilities, banks and other financial institutions);
- c. Yankee bonds and Eurodollar bonds;
- d. Supranational institutions, e.g. the World Bank

Care will be taken to limit the use of high risk securities, as defined under the Federal Financial Institutions Examinations Council (FIEC) guidelines, to no more than 15% of the fixed income portfolio. This limit includes securities rated below investment grade (high yield) and securities issued under rule 144A

Investment in foreign bonds within the fixed income asset class shall be done on a tactical basis and shall not exceed 20% of the total Fund investment in fixed income securities at market value. Foreign bonds shall be of investment grade at the time of purchase.

3. Cash Equivalents

The cash portion of the Fund may be invested in:

- a. The Short-Term Income Fund (STIF) which is a commingled money market fund used through The Bank of New York called the Collective Short-Term Investment Fund.

b. Money Market Securities as follows:

- 1) domestic commercial paper shall be A-1 as rated by Standard & Poor's rating service and P-1 as rated by Moody's rating service;
- 2) domestic prime banker's acceptances; and
- 3) certificates of deposit issued by a domestic bank issuing prime banker's acceptances

4. Real Estate

Institutional quality real estate equity in the form of commingled real estate fund participation and separate accounts of individual property.

Publicly traded investments in real estate operating companies and real estate investment trusts.

5. No-Load Mutual Funds or Pooled Funds

The stock, fixed income or cash portion of the Fund may employ Pooled Funds or No-load Mutual Funds. However, it is expected that the majority of the Fund shall be individually invested. When such funds are used as part of an Investment Manager's portfolio, the Investment Manager will adjust fees such that the use of the Mutual Fund(s) does not result in a higher management fee expense.

6. Use of Futures, Options, and Forward Contracts

The use of futures, options or forward contracts is prohibited unless the use is specifically for defensive hedging of currency risk. An Investment Manager that manages a mutual fund or similar account that is indexed to one of the major market indexes may use futures, options or forward contracts on an unleveraged basis to maintain proper tracking to the benchmark index.

C. RISK TOLERANCE / AVOIDANCE

The following practices shall be utilized to avoid risk to or loss of principal and/or income:

1. Prohibited Investments

The Board's written permission is required for the purchase of unregistered or restricted stock.

2. Broker-Dealer Selection / Credit Risk

The investment managers shall select securities broker-dealers to execute transactions for the Fund only after they are satisfied regarding the credit soundness of regulatory history of each broker-dealer.

3. Issuer Quality / Default Risk

The ability of the issuer to repay fixed income securities on schedule shall be a primary determinant when making an investment decision to avoid the risk of default.

4. Diversification / Limiting Exposure to Risk

The Fund's investments shall be diversified in order to avoid substantial exposure to any one risk, whether determinable or unforeseen.

a. Asset Allocation

Asset allocation is an essential factor of total Fund return and diversification. The following targets apply:

U.S. Stocks (Larger Capitalization)	25%
U.S. Stocks (Smaller Capitalization)	15%
Non-U.S. Stocks	20%
Fixed Income Securities	35%
Real Estate	5%
Cash Equivalents	0%

The amount allocated to a specific asset class may fluctuate within a range or plus or minus 5% of the targets specified.

b. Maximum Holdings

An investment manager shall prudently invest fund moneys so as to avoid an over-concentration in any one particular securities issue or industry. An investment manager shall follow the diversification standards set forth in the applicable investment manager guidelines.

5. Investment Strategies / Trading Risks

Securities shall be bought and sold in a manner which is consistent with the objectives of the Fund. Practices such as short-term trading are prohibited. Margin trading will be allowed only with the written permission of the Board. No strategy which risks the total Fund shall ever be employed.

D. RETURN ON INVESTMENT / FUND PERFORMANCE STANDARDS

The Fund's total rate of return is dependent upon asset allocation and policy direction from the Board to the investment managers. Performance shall be evaluated on an annual basis. The evaluation shall be made with the expectation of achieving the performance standards over the time period to occur first, either a three (3) to five (5) year investment period or a market cycle. The total rate of return shall be evaluated net of all management fees and other transaction costs. The total Fund performance shall be evaluated as follows:

1. Targeted Rate of Return

- a. a total rate of return that equals or exceeds the targeted total rate of return of eight percent (8%); and
- b. a total rate of return on average that exceeds the consumer price index (CPI) by four percent.

2. Allocation Index

The Board shall evaluate the total rate of return of the Fund on a time-weighted basis and compare it to the Allocation Index. The total return of the Fund is expected to exceed the Allocation Index as the measure of added value generated by active investment management.

3. Comparison to Other Funds

The Board shall evaluate the total Fund investment performance on a time-weighted basis and compare it with other similarly managed funds reporting to Performance Universes recommended by the Investment Consultant. Over the period of investment, it is expected the total Fund performance shall rank in the upper thirty-three percent (33%) of the Performance Universe of total plans.

4. Risk Adjusted Total Rate of Return

The Board shall evaluate the Sharpe Ratio of the total Fund investments. Over the period of investment, the total Fund Sharpe Ratio is expected to exceed the same measure for the Allocation Index.

5. Standard Deviation of Returns Limit

The Board shall evaluate the annualized standard deviation of quarterly returns for each investment manager in accordance with the appropriate investment manager guidelines.

6. Investment Manager Performance Standards

The Board shall evaluate each investment manager's performance over the time period to first occur, either a three (3) to five (5) year investment period or a market cycle. The Board shall evaluate each investment manager's performance according to the appropriate investment manager guidelines.

7. Turnover

The rate of asset turnover shall not be an evaluation factor if the investment performance results meet the Board's objectives.

E. PROXIES AND CORPORATE ACTIONS

1. Proxies

Investment managers, with the exception of managers of index funds, which shall vote according to the policies of the index fund, shall vote or make recommendations to vote proxies for the exclusive interest of the Fund Participants and beneficiaries as follows:

- a. Voting a Proxy Against Management An investment manager shall vote against management on any issue expected to have a material adverse effect on the price of the security or the rights and privileges of the security, including such matters as:
 - 1) an increase in authorized shares which would dilute the interests of present shareholders;
 - 2) stock option plans involving a dilution of shareholders' interest. A dilution of ten percent (10%) or more is unacceptable;
 - 3) extreme anti-takeover measures (e.g., high minimum price and 80% vote required); and
 - 4) any unusual compensation or benefits to be awarded contingent upon the merger or acquisition of a particular company.
- b. Voting a Proxy in Favor of Management An investment manager shall vote in favor of management proposals as follows:
 - 1) as recommended by management unless such recommendation is not in the best economic interest of the shareholders; and
 - 2) proposals by management not affecting the economic benefit or voting rights of the shareholder.

- c. Abstaining from Voting a Proxy An investment manager shall vote on all proxy issues presented.
- d. Conflicting Issues An investment manager shall refer proxy issues to the Treasurer if there is a conflict among proxy instructions given herein. An investment manager shall notify the Board of any proxy votes where the issuing company is a client of the investment manager, or where the investment manager is a subsidiary or affiliate of the issuing company.

2. Corporate Actions

The investment managers shall have full discretion in the resolution of corporate actions.

F. ADMINISTRATION OF INVESTMENTS

- 1. Custody All assets of the Fund shall be secured through the use of a Treasurer-designated third-party custodial institution. Safekeeping procedures shall be reviewed annually by the State Auditor. The State Auditor may conduct surprise audits of safekeeping procedures.
- 2. Transaction Settlement All purchases and sales of securities shall be on a delivery versus payment basis unless provided for in writing by the Treasurer.
- 3. Brokerage Services

- a. Iowa Services

Broker-dealer firms with an office in Iowa shall be given an opportunity to compete for various transactions. Iowa firms shall be given preference if the bid/offer on a transaction is equal to bids/offers of broker-dealers without an office in Iowa.

- b. Best Execution

Each investment manager shall seek to obtain the best combination of price and execution from broker-dealers for each trade of the Fund for broker-dealers meeting the broker-dealer contract requirements.

- c. Commission Recapture Program

The Board encourages, but does not requires, certain of its equity managers to direct brokerage transactions to mission recapture brokers (approved by the Board) to the extent these brokers can provide best execution. Best execution is defined as achieving the most favorable price and execution services

available, bearing in mind the Fund's best interests, and considering all relevant factors. The Treasurer will monitor on an ongoing basis the services provided by the commission recapture brokers so as to assure that the investment managers are securing the best execution of the fund's brokerage transactions. The Board recognizes that providers of mutual funds or commingled funds are not able to participate in the commission recapture program.

G. GOALS OF ADMINISTRATION

1. No Conflict of Interest

The Board shall not have direct interest in the profit or gain of the Fund, directly or indirectly use the assets of the Fund except to make current and necessary payments as authorized by the Board, or become an endorser or surety or in any manner an obligor for moneys loaned by or borrowed from the Board (Sec. 97A.7(4)).

2. Personnel, Procedures and Practices

The Board and the Treasurer shall employ competent, qualified personnel and shall set up procedures to assure efficiency and safety in Fund management.

APPENDIX A

Asset Class	Investment Manager	Benchmark
Large Cap Equity - Active	Gardner Lewis	Russell 1000
Large Cap Equity - Passive	State Street Global Advisors	Russell 3000
Small Cap Equity	Fisher Investments	Wilshire Small Cap Value
International Equity	Walter Scott	MSCI EAFE
Core Plus Fixed Income	UBS Global Asset Mgmt	Lehman Aggregate
Real Estate	Principal Global Investors	NCREIF and NAREIT