

CIVIC CENTER MONROE COUNTY LOCAL DEVELOPMENT CORPORATION

Investment Policy

Civic Center Monroe County Local Development Corporation (“Corporation”) is a Not-For-Profit Local Development Corporation pursuant to Section 402 of the Not-For-Profit Corporation Law of the State of New York. The following shall constitute the Investment Policy of the Corporation required pursuant to the Public Authorities Law.

1. Objectives.

The objectives of the Corporation’s Investment and Deposit Policy are:

- a. Investments and bank deposits (hereafter collectively referred to as (“investments”) shall be made in a manner so as to safeguard the funds of the Corporation and funds under the control of the Corporation;
- b. Investments shall be sufficiently liquid so as to allow funds to be available as needed to meet the obligations of the Corporation; and
- c. Funds shall be invested in such a way as to earn the maximum yield possible given the first two (2) investment objectives.

2. Deposit of Monies.

All monies of the Corporation from whatever source derived shall be deposited forthwith in a bank or banks designated by the Board of Directors; and, to the extent practicable, consistent with the cash requirements of the Corporation, all such money shall be deposited in interest bearing accounts.

3. Permitted Investments.

The following is a list of the permitted investments that may be made with the funds of the Corporation in a manner and upon such terms as are consistent with the appropriate provisions of law relating to the Corporation.

- a. Direct or indirect obligations of the State or any municipality, instrumentality, or political subdivision thereof, or the United States of America or any instrumentality thereof.
- b. Obligations, the full and timely payment of the principal and interest of which are directly and unconditionally guaranteed by the State or United States of America.

c. Bankers' acceptances of, or certificates of deposits issued by, or time deposits or other banking arrangements or deposits with a Bank with a rating of investment grade at all times by a Rating Agency.

d. Commercial paper of any Corporation which has been classified for rating purposes by a Rating Agency as Prime-1 and by Standard & Poor's as A-1.

e. Money market funds or other mutual funds which have been classified with at least an AAA rating as determined by Standard & Poor's Rating Group or AAA rating as determined by Moody's Investor's Service Inc. and which invest predominately in assets described in (a) or (b) above.

4. Requirement of Written Contracts.

a. For any investment of funds, the Corporation shall enter into a written contract pursuant to which the investment is made, except where the Board shall by Resolution determine that:

1. A written contract is not practical; or
2. There is no regular business practice of executing a written contract with respect to a particular investment or transaction.

b. In situations where there is no written contract for a particular investment the Corporation shall follow such procedures as are appropriate to protect its financial interest.

5. Standards for Diversification of Investments.

Investments of the Corporation shall be reasonably diversified, as shall the investment firms or banks with which the Corporation transacts investment business. This shall not be construed so as to mandate absolute diversification in the event that it is determined, in a certain instance, that diversification is not in the best interest of the Corporation.

6. Standards for the Qualification of Investment Bankers, Brokers, Agents, Dealers and other Investment Advisors.

The Corporation shall transact business only with qualified, certified, or licensed investment bankers, brokers, agents, dealers, and other investment advisors and agents.

7. Operations and Management.

The Board of Directors will designate an individual or entity responsible for investment of the Corporation's funds. Investments will be based upon projections of the Corporation's cash flow needs so that investments shall mature at such time when funds are estimated to be needed for the orderly payment of Corporation obligations. The Treasurer shall annually review or have

reviewed the financial statements of all financial institutions in which the Corporation is depositing funds or entering into investment transactions and shall determine that the institution has satisfactory financial strength.

8. Annual Audit of Investments.

The Corporation shall annually engage a firm qualified to conduct an independent audit of all investments. The results of the audit shall be made available to the Corporation at the time that the annual review and approval of these investment guidelines is conducted.

9. Annual Investment Report.

a. In the event that investment reporting is required pursuant the Public Authority Accountability Act (PAAA) of 2005, within ninety (90) days after the end of its fiscal year, the Treasurer shall prepare and the Board shall approve an annual investment report that shall include;

1. These investment guidelines as then currently amended;
2. A description of any amendments to these investment guidelines since the last annual investment report;
3. An explanation of these investment guidelines as amended;
4. The results of the annual independent audit;
5. The investment income record;
6. A list of the total fees, commissions, or other charges paid to each investment banker, broker, agent, dealer, and advisor that rendered investment associated services to the Corporation since the last annual investment report.

b. Routine investments and investment income not reportable pursuant to PAAA will be reported as part of the Corporation's Financial Statements.

c. The annual investment report may be a part of any other annual report that the Corporation is required to make. Said investment report shall be submitted to the Chief Executive Officer and the Chief Fiscal Officer of the County of Monroe.

10. Effective Date Annual Review.

These investment guidelines shall be effective as of the date adopted, may be amended from time to time, and shall be reviewed and approved on an annual basis by the Board of Directors.

Re-Adopted: March 30, 2011
Re-Adopted: October 28, 2010
Revised: January 21, 2010
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Revised: July 17, 2008
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