



Village Policy
INVESTMENT POLICY

Effective Date:
March 1, 2021

Board Approved:
March 1, 2021
Resolution #2110

I. Governing Authority

The Village of Orland Park's investment program shall be operated to provide the highest investment return, with maximum security, while meeting the daily cash flow demands of the Village and conforming to all state and local statutes governing the investment of public funds.

II. Scope

This policy applies to the investment of all funds of the Village of Orland Park, with the exception of restricted or special funds or investments held by the Orland Park Police Pension Fund and the Village Library Fund as these funds are subject to the order of the Board of Trustees of each respective fund.

It is the policy of the Village of Orland Park to invest public funds in a manner which will provide the highest investment return with the maximum security while meeting the daily cash flow demands of the Village and conforming to all state and local statutes governing the investment of public funds.

Except for cash in certain restricted and special funds, the Village of Orland Park will consolidate cash and reserve balances from all funds to maximize investment earnings and to increase efficiencies with regard to investment pricing, safekeeping and administration. Investment income shall be allocated to the various funds based on their respective participation and in accordance with generally accepted accounting principles.

III. General Objectives

The primary objectives of investment activities, in priority order, shall be Legality, Safety, Liquidity, and Total Return.

A. **Legality** - conformance with federal, state and other legal requirements is the foremost objective of the investment program.

B. **Safety** - Investments shall be undertaken in a manner that seeks to ensure the preservation of capital in the overall portfolio. The objective will be to mitigate credit risk and interest rate risk.

1. **Credit Risk** - The Village of Orland Park will minimize credit risk, the risk of loss due to the failure of the security issuer or backer, by:

- i. Limiting investments to securities listed in this policy.
- ii. Pre-qualifying the financial institutions, broker/dealers, intermediaries, and advisers with which the Village of Orland Park

will do business.

- iii. Diversifying the investment portfolio so that potential losses on individual securities will be minimized.
2. *Interest Rate Risk* - The Village of Orland Park will minimize the risk that the market value of securities in the portfolio will fall due to changes in general interest rates, by:
 - i. Structuring the investment portfolio so that securities mature to meet cash requirements for ongoing operations, thereby avoiding the need to sell securities on the open market prior to maturity.
 - ii. Investing operating funds primarily in short-term securities, money market mutual funds, or similar investment pools.
 3. *Custodial Credit Risk*. Custodial Credit Risk is the risk that, in the event of a bank or counterparty failure, the Village's collateral securing uninsured deposits or investments may not be recovered. The Village will minimize custodial credit risk over deposits with financial institutions by ensuring that all deposits with financial institutions are insured or collateralized with securities held by the Village's agent in the Village's name. All investments shall be conducted on a Delivery vs Payment (DVP) basis. Securities will be held by a third-party securities custodian designated by the Village separate from where the investment was purchased.
- C. *Liquidity* - The investment portfolio shall remain sufficiently liquid to meet all operating requirements that may be reasonably anticipated. This is accomplished by structuring the portfolio so that securities mature concurrent with cash needs to meet anticipated demands. Furthermore, since all possible cash demands cannot be anticipated, the portfolio should consist largely of securities with active secondary or resale markets. A portion of the portfolio also may be placed in money market mutual funds or local government investment pools which offer same-day liquidity for short-term funds.
- D. *Yield* - The investment portfolio shall be designed with the objective of attaining a market rate of return, based on appropriate performance benchmarks, throughout budgetary and economic cycles, taking into account the investment risk constraints and liquidity needs. Appropriate performance benchmarks by include the average yield on either three month U.S. Treasury bills, a state investment pool, a specific money market mutual fund or the average fed funds rate. Return on investment is of secondary importance compared to the safety and liquidity objectives described above. The core investments are limited to relatively low risk securities in anticipation of earning a fair return relative to the risk being assumed. Securities shall not be sold prior to maturity with the following exceptions:
1. A security with declining credit may be sold early to minimize loss of principal.
 2. A security swap would improve the quality, yield, or target duration in the portfolio.
 3. Liquidity needs of the portfolio require that the security be sold.

The portfolio should be reviewed periodically as to its effectiveness in meeting the entity's needs for safety, liquidity, rate of return, diversification and its general performance.

IV. Standards of Care

- A. ***Prudence*** - The standard of prudence to be used by investment officials shall be the "prudent person" standard and shall be applied in the context of managing an overall portfolio. The prudent person standard means investments 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 shall be applied in the context of managing the entire portfolio. Investment officers acting in accordance with written procedures and this investment policy and exercising due diligence shall be relieved of personal responsibility for an individual security's credit risk or market price changes, provided deviations from expectations are reported in a timely fashion and the liquidity and the sale of securities are carried out in accordance with the terms of this policy.
- B. ***Ethics and Conflicts of Interest*** - Officers and employees involved in the investment process shall refrain from personal business activity that could conflict with the proper execution and management of the investment program, or that could impair their ability to make impartial decisions. Employees and investment officials shall disclose any material interest in financial institutions with which they conduct business. They shall further disclose any personal financial/investment positions that could be related to the performance of the investment portfolio. Employees and officers shall refrain from undertaking personal investment transactions with the same individual with whom business is conducted on behalf of the Village of Orland Park.
- C. ***Delegation of Authority*** - Management and administrative responsibility for the investment program is hereby delegated to the Finance Director who, under the delegation of the Board of Trustees, shall establish written procedures for the operation of the investment program.

Procedures should include references to safekeeping, delivery vs. payment, investment accounting, repurchase agreements, wire transfer agreements, and collateral/depository agreements. No person may engage in an investment transaction except as provided under the terms of this policy and the procedures established by the Finance Director. The Finance Director shall be responsible for all transactions undertaken and shall establish a system of controls to regulate the activities of subordinate officials, including outside investment managers.

V. **Authorized Financial Institutions, Depositories and Brokers/Dealers**

- A. **Authorized Financial Institutions, Depositories and Brokers/Dealers** - A list, to be approved by the Village Board, will be maintained of financial institutions authorized to provide investment services. In addition, a list also will be maintained of approved security broker/dealers selected by creditworthiness. These may include "primary" dealers or regional dealers that qualify under Securities and Exchange Commission (SEC) Rule 15C3-1 (uniform net capital rule).

All financial institutions and broker/dealers who desire to become qualified for investment transactions must supply the following as appropriate:

1. Audited financial statements
2. Proof of Financial Industry Regulatory Authority (FINRA) certification
3. Proof of state registration
4. Completed broker/dealer questionnaire
5. Certification of having read and understood and agreeing to comply with the Village of Orland Park's investment policy
6. Evidence of adequate insurance coverage

An annual review of the financial condition and registration of qualified financial institutions and broker/dealers will be conducted by the Finance Director.

VI. **Safekeeping and Custody**

- A. **Delivery Vs. Payment** - All security transactions, including collateral for repurchase agreements, entered into by the Village of Orland Park, shall be conducted on a delivery-versus-payment (DVP) basis. Securities will be held by an independent third party custodian designated by the Finance Director and evidenced by safekeeping receipts and a written custodial agreement.
- B. **Safekeeping** - Securities will be held by an independent third party custodian selected by the Village of Orland Park with all securities held in the Village's name. The safekeeping institution shall annually provide a copy of their most recent report on internal controls, if applicable.
- C. **Internal Controls** - The Finance Director is responsible for establishing and maintaining an internal control structure designed to ensure that the assets of the Village of Orland Park are protected from loss, theft or misuse. The internal control structure shall be designed to provide reasonable assurance that these objectives are met. The concept of reasonable assurance recognizes that (1) the cost of a control should not exceed the benefits likely to be derived and (2) the valuation of costs and benefits requires estimates and judgments by management.

Accordingly, the Finance Director shall establish a process for an annual independent review by an external auditor to assure compliance with policies and procedures. The internal controls shall address the following points:

1. Control of collusion
2. Separation of transaction authority from accounting and recordkeeping
3. Custodial safekeeping
4. Avoidance of physical delivery securities
5. Clear delegation of authority to subordinate staff members
6. Written confirmation of transactions for investments and wire transfers
7. Dual authorizations of wire transfers.
8. Development of a wire transfer agreement with the lead bank and third-party custodian

VII. Suitable and Authorized Investments

A. Allowable Investments – Consistent with Illinois Compiled Statutes (30 ILCS 235 / Public Funds Investment Act), as well as the GFOA Policy Statement on State and Local Laws Concerning Investment Practices, the following investments will be permitted by this policy:

1. Bonds, notes, certificates of indebtedness, treasury bills, or other securities, including obligations of the Government National Mortgage Association, which are guaranteed by the full faith and credit of the United States of America as to principal and interest.
2. Bonds, notes, debentures, or other similar obligations of the United States of America or its agencies.
3. Interest-bearing savings accounts, interest-bearing certificates of deposit or interest-bearing time deposits or any investment constituting direct obligations of any bank, as defined by the Illinois Banking Act, that is insured by the Federal Deposit Insurance Corporation.
4. Insured short term obligations of corporations organized in the United States with assets exceeding \$500,000,000 if (i) such obligations are rated at the time of purchase at one of the three highest classifications established by at least two standard rating services and which mature not later than 270 days from the date of purchase, (ii) such purchases do not exceed 10% of the corporation's outstanding obligations and (iii) no more than one-third of the Village's funds may be invested in short term obligations of corporations.
5. Money Market Mutual Funds registered under the Investment Company Act of 1940, provided that the portfolio of any such money market mutual fund is limited to obligations described in paragraph (1) and (2) above and to agreements to repurchase such obligations.

6. Investment-grade obligations of state, provincial and local government and public authorities;
7. Repurchase agreements whose underlying purchased securities consist of the aforementioned instruments;
8. Money market mutual funds regulated by the Securities and Exchange Commission and whose portfolios consist only of dollar-denominated securities; and
9. Local government investment pools, either state-administered or through joint power statutes and other intergovernmental agreement legislation.

Investments shall be made that reflect the cash flow needs of the fund type being invested.

B. Environmental, Social and Governance Considerations – Material, relevant, and decision-useful sustainability factors are regularly considered by the Village, within the bounds of financial and fiduciary prudence, in evaluating investment decisions. Such factors include, but are not limited to: (i) corporate governance and leadership factors; (ii) environmental factors; (iii) social capital factors; (iv) human capital factors; and (v) business model and innovation factors, as provided under the Illinois Sustainable Investing Act (30 ILCS 238).

The Village will periodically consult with its investment provider(s) about the role of Environmental, Social and Governance (ESG) analysis in its investment process and implications for the Village’s investment portfolio.

C. Collateralization - Funds on deposit (checking accounts, certificates of deposit, etc.) in excess of FDIC limits must be secured by some form of collateral, witnessed by a written agreement and held at an independent, third party institution in the name of the Village of Orland Park.

The Village will accept any of the following assets as collateral:

1. U.S. Government Securities
2. Obligations of Federal Agencies
3. Obligations of Federal Instrumentalities
4. Obligations of the State of Illinois
5. Obligations of the Village of Orland Park
6. General Obligation Municipal Bonds rated “A” or better (i.e., at least upper medium quality) by Moody’s Investors Service, Standard & Poor’s Rating Service, or Fitch Investors Service

The Finance Director may reject any form of collateral at any time.

The amount of collateral provided will be not less than 105% of the fair market value of the net amount of public funds secured. The ratio of fair market value of collateral to the amount of funds secured will be reviewed monthly and additional collateral will be requested when the ratio declines below the level required. Pledged collateral will be held by the Village of Orland Park or in safekeeping and evidenced by a safekeeping agreement. If collateral is held in safekeeping, it may be held by an independent third party deposit, of the Federal Reserve Bank, or by an escrow agent of the pledging institution. Collateral agreements will preclude the release of the pledged assets without an authorized signature from the Village of Orland Park, but they will allow for an exchange of collateral of like value.

The market value of collateral will be determined by Bloomberg on the last business day of the month and presented to the Village on monthly statements.

Financial institutions pledging collateral will sign a collateral agreement that meets the requirements of the Financial Institution Resource Recovery Enforcement Act (FIRREA) acceptable to the Finance Director.

VIII. Investment Diversification and Constraints

A. Diversification – It is the policy of the Village of Orland Park to diversify its investment portfolio. To eliminate risk of loss resulting from the overconcentration of assets in a specific maturity, issuer or class of securities, all cash and cash equivalent assets in all funds shall be diversified by maturity, issuer and security type.

In establishing specific diversification strategies, the following general policies and constraints shall apply:

1. Portfolio maturities shall be staggered to avoid undue concentration of assets in a specific maturity sector. Maturities selected shall provide for stability of income and reasonable liquidity.
2. Positions in securities having a potential default risk, (i.e., commercial paper) shall be limited in size so that in case of default, the portfolio's annual investment income will exceed a loss on a single issuer's securities.
3. Risks of market price volatility shall be controlled through maturity diversification and duration management.

B. Maximum Maturities - To the extent possible, the Village of Orland Park shall attempt to match its investments with anticipated cash flow requirements. Unless matched to a specific cash

flow, the Village of Orland Park will not directly invest in securities maturing more than three (3) years from the date of purchase.

1. Reserve funds and other funds with longer-term investment horizons may be invested in securities exceeding three (3) years, up to five (5) years, if the maturity date of said investments is made to coincide as nearly as practicable with the expected use of funds. The intent to invest in securities with longer maturities shall be disclosed in writing to the Village Board.

2. Because of inherent difficulties in accurately forecasting cash flow requirements, a portion of the portfolio should be continuously invested in readily available funds such as local government investment pools, money market funds, or overnight repurchase agreements to ensure that appropriate liquidity is maintained to meet ongoing obligations.

IX. Reporting

A. Methods - The Finance Director shall prepare an investment report at least quarterly, including a management summary that provides an analysis of the status of the current investment portfolio and transactions made over the last quarter. This management summary will be prepared in a manner which will allow the Village of Orland Park to ascertain whether investment activities during the reporting period have conformed to the investment policy. The report should be made available as requested by the Board of Trustees or other interested parties. The report will include the following:

1. Listing of individual securities held at the end of the reporting period.
2. Realized and unrealized gains or losses resulting from appreciation or depreciation by listing the cost and market value of securities over one-year duration that are not intended to be held until maturity.
3. Average weighted yield to maturity of portfolio on investments as compared to applicable benchmarks.
4. Listing of investment by maturity date.
5. Percentage of the total portfolio which each type of investment represents.
6. The purchase and safekeeping institutions.

B. Performance Standards - The investment portfolio will be managed in accordance with the parameters specified within this policy. The portfolio should obtain a market average yield during a market/economic environment of stable interest rates. A series of appropriate benchmarks shall be established against which portfolio performance shall be compared on a regular basis. The benchmarks shall be reflective of the actual securities being purchased and

risks undertaken and the benchmarks shall have a similar weighted average maturity as the portfolio.

C. Write Up to Market - The market value of the portfolio shall be calculated at least quarterly and a statement of the market value of the portfolio shall be issued at least quarterly. This review of the investment portfolio, in terms of value and price volatility, should be performed consistent with the GFOA Recommended Practices on "Mark-to-Market Practices for State and Local Government Investment Portfolios and Investment Pools". In defining market value, considerations should be given to the GASB Statement 31 pronouncement.

X. Policy Considerations

A. Amendments - The investment policy shall be adopted by the Board of Trustees. The policy shall be reviewed on an annual basis by the Finance Director and any modifications made thereto must be approved by the Board of Trustees.

B. Exemption. Any investment currently held that does not meet the guidelines of this policy shall be exempted from the requirements of this policy. At maturity or liquidation, such monies shall be reinvested only as provided by this policy.