

# **INVESTMENT POLICY STATEMENT**

**For**

**Lehigh County Employees'  
Retirement Plan**

Prepared May 2014



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**EXECUTIVE SUMMARY**

**Type of Fund:**.....Municipal Defined Benefit Retirement Plan

**Current Assets:**.....Approximately \$450,000,000 (as of 03/31/14)

**Planning Time Horizon:** .....Greater than 5 years

**Expected or Modeled Return:**.....6.7% (4.2% over CPI)

**25 Year Historical Return:**.....7.6% (5.1% over CPI)

**Risk Tolerance:**..... Moderate, losses not to exceed -13.1%/year,  
statistical confidence level of 95%

**Asset Allocation**

<b>Asset Allocation</b>	<b>Lower Limit</b>	<b>Strategic Allocation</b>	<b>Upper Limit</b>
Domestic Equity	25%	<b>35%</b>	45%
Large Cap Value		<b>5%</b>	
Large Cap Core		<b>18%</b>	
Large Cap Growth		<b>5%</b>	
S/Mid Cap Broad		<b>7%</b>	
International Equity	5%	<b>15%</b>	25%
Domestic Fixed Income	20%	<b>35%</b>	45%
Liquid Alternatives	0%	<b>10%</b>	20%
Cash & Equivalents	0%	<b>5%</b>	15%

**Portfolio Benchmark:**

Total return to exceed performance of a median Balanced Fund database or a weighted index comprised of: 28% S&P 500; 7% Russell 2000; 15% MSCI ACWI ex-US; 35% Barclays Aggregate Bond Index; 10% Blended Alternative Benchmark; 5% 90 Day T-Bills.

## **DESCRIPTION OF THE LEHIGH COUNTY RETIREMENT PLAN**

Lehigh County administers its own defined benefit plan, known as the Lehigh County Employees' Retirement Pension Plan (the "Plan"). The purpose of this Plan is to provide retirement benefits for employees of Lehigh County who meet the age and service requirements outlined in the Plan. The Plan consists of contributions from the employees and Lehigh County. The Lehigh County Home Rule Charter has established the Employees' Retirement Board (the "Board") to oversee certain policies and procedures related to the operation of the Plan pursuant to Act 96 of 1971.

The "County Pension Law," Act 96 of 1971, as amended was enacted by the General Assembly of the Commonwealth of Pennsylvania and contains the provisions governing the establishment and operation of a retirement system for county employees. As designated in the Lehigh County Home Rule Charter (as amended through January 1, 2008), the Lehigh County Retirement System is administered by a Retirement Board consisting of seven members: the County Executive, a member of the Board selected by the Board, the Controller, the Chairperson of the Board, one person appointed by the County Executive from among the membership; of the retirement system, one person receiving pension benefits, and one person employed by the County of Lehigh and participating in the plan and elected by ballot from among the membership of the retirement system. Each member of the board is a trustee of the Fund, and a fiduciary. Each is required to administer the affairs of the board in accordance with the provisions of the County Pension Law. A record shall be kept of all the proceedings of the board and this record shall be open to inspection by the public.

All appointed county employees, except those employees hired on a part-time basis are automatically members of the Plan when they first become employees. An elected officer, however, may become a member of the Plan at a later date.

### **PURPOSE**

The purpose of this Investment Policy Statement (IPS) is to assist the Retirement Board (Board) in effectively supervising, monitoring and evaluating the investment portfolio (Plan). The Plan's investment program is defined in the various sections of the IPS by:

- Stating in a written document the Retirement Board's attitudes, expectations, objectives and guidelines for the investment of all Plan assets.
- Setting forth an investment structure for managing all Plan assets. This structure includes various asset classes, investment management styles, asset allocation and acceptable ranges that, in total, are expected to produce a sufficient level of overall diversification and total investment return over the long-term.
- Providing guidelines for each investment portfolio that control the level of overall risk and liquidity assumed in that portfolio, so that all Plan assets are managed in accordance with stated objectives.
- Encouraging effective communications between the Board, Cornerstone Advisors Asset Management, Inc. (Consultant), money managers, and all other service providers.
- Establishing formal criteria to monitor, evaluate and compare the performance results achieved by the money managers on a regular basis.
- Complying with all applicable fiduciary, prudence and due diligence requirements that experienced investment professionals would utilize, and with all applicable laws, rules and



regulations from various local, state, federal and international political entities that may impact Plan assets. This includes the “County Pension Law,” (Act 96), as amended.

This IPS has been formulated, based upon consideration by the Board of the financial implications of a wide range of policies and describes the prudent investment process that the members deem appropriate.

### **AUTHORITY AND RESPONSIBILITY**

- The Board has ultimate responsibility and full authority over Plan assets.
- The Board establishes operational procedures, selects and supervises all service providers; and conducts ongoing assessments of investment manager performance.
- The Board may retain the use of a Consultant to help manage the investment process. The Consultant will supervise the day-to-day activity of the Plan within the context of the Investment Policy Statement. The Consultant will acknowledge its fiduciary responsibility as a Deposit Administrator in writing and may operate with discretion at the request of the Board.
- The Custodian will be responsible for the safekeeping of all Plan assets and the processing of securities transactions as determined by money managers and the Consultant. The Custodian will also acknowledge its role as a Deposit Administrator for the Plan in writing.
- Money managers will be retained to manage Plan assets within their area of expertise. Managers will be responsible for security selection within the context of the Policy Statement and are expected to exercise the appropriate level of due care in the management of the portfolio as required under Act 96.

### **SPECIFIC ROLE OF THE RETIREMENT BOARD**

Recognizing that asset mixes are major determinants of long-term investment returns and of levels of risk, to which the Plan might be exposed, the Board may:

- Routinely review overall asset allocation ratios and, at the recommendation of the Consultant, direct investment managers to shift assets to bring the portfolios within acceptable ranges of risk exposure, or
- Give discretion to the investment Consultant, thereby permitting them to use their professional judgments to manage asset allocation and portfolio structure within the context of the Investment Policy Statement.

If the latter option is chosen, the Board shall (1) provide the investment managers with specific objectives relating to overall performance requirements and (2) evaluate actual performance on a regular basis. Such evaluations must be comparative in nature against appropriate indices for asset/security categories.

### **CONDITIONS AND ASSUMPTIONS**

- The Board acknowledges that is it governed by Act 96.and subsequently by 20 Pa.C.S. Ch. 73 and chooses to adopt an investment policy to clarify its intentions on the management of the Fund.

- Some Plan growth is expected from contributions. These contributions, however, are largely a result of the actuarially determined Funding status and cannot be relied upon to provide any specific annual increases.
- Growth via investment appreciation is encouraged. Earnings and growth in excess of the benefit payout and expenses will be reinvested in accordance with Board's Investment Policy.
- The Plan is a tax-exempt entity; therefore investments should be managed without consideration of taxes.

## **STATEMENT OF OBJECTIVES**

The objectives of the Board have been established in conjunction with a comprehensive review of the current and projected financial requirements. The objectives are:

- To provide full funding for retirement benefits for Plan participants and beneficiaries.
- To maintain the purchasing power of the current assets and all future contributions.
- To maximize return within reasonable and prudent levels of risk.
- To maintain an appropriate asset allocation based on a total return policy that is compatible with the actuarially assumed rate of return, while still having the potential to produce positive real returns.
- To minimize costs of administering the Plan and managing the investments.

Investment results are a critical element in achieving the stated objectives. Investment earnings and future contributions are expected to be used to fund Plan liabilities.

### ***Time Horizon***

The investment guidelines are based upon an investment horizon of greater than five years so that interim fluctuations should be viewed with appropriate perspective. Similarly, the Plan's strategic asset allocation is based on this long-term perspective.

Short-term liquidity requirements have been anticipated and will be handled from contributions and/or the amount allocated to cash.

### ***Risk Tolerances***

The Board recognizes the difficulty of achieving the Plan's investment objectives in light of the uncertainties and complexities of contemporary investment markets. The Board also recognizes that some risk must be assumed to achieve the Plan's long-term investment objectives. Therefore, the Board's prospects for the future, current financial condition, and several other factors, suggest collectively that the Plan can tolerate some interim fluctuations in market value and rates of return in order to achieve long-term objectives. Refer to "Control Procedures" for additional information.

The Board has identified a level of volatility that is consistent with the investment objectives of the Plan and will attempt to manage that volatility within a reasonable range.

## Acceptable Ranges of Standard Deviation

Lower Limit 6	Target 9	Upper Limit 12
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Risk can be measured in many different ways. The Board will monitor volatility statistics with the goal of being between the 25<sup>th</sup> and 75<sup>th</sup> percentile of our respective peer groups over rolling three year periods of time. Some, but not all of these measures may include; beta, standard deviation, downside risk, residual risk and tracking error.

Should the portfolio realize results outside of the acceptable ranges the Board, with the help of its Consultant, will attempt to find the source of such volatility, or lack thereof, and ascertain its future usefulness in the portfolio.

### *Performance Expectations*

The desired investment objective is a long-term rate of return on assets that is at least 6.7%, net of fees, which is 4.2% greater than the anticipated rate of inflation as measured by the Consumer Price Index (CPI). The target rate of return has been based upon current capital market assumptions and is below the long-term rates of return experienced for each asset class in the IPS.

The Board realizes that market performance varies and that a 6.7%, net of fees rate of return may not be meaningful during some periods. Accordingly, relative performance benchmarks for the managers are set forth in the "Control Procedures" section.

Over a complete market cycle, the Plan's overall annualized total return, after deducting for advisory, money management, and custodial fees, as well as total transaction costs, should perform above at least two of the following benchmarks:

- 4.2% above the trailing 3-year Consumer Price Index, (CPI)
- 6.7% annualized rate of return, net of fees
- Above a customized index comprised of indices weighted by the strategic asset allocation of the Fund.
- Above the median of a Balanced Fund universe

### *Asset Allocation Constraints*

The Board believes that the Plan's risk and liquidity posture is, in large part, a function of asset class mix. The Board has reviewed the long-term performance characteristics of various asset classes, focusing on balancing the risks and rewards of market behavior. The following asset classes were selected:

- Domestic Large Capitalization Equities
- Domestic Mid-Capitalization Equities
- Domestic Small Capitalization Equities
- International Equities
- Domestic Fixed Income
- Liquid Alternative Investments
- Cash

Based on the Plan's time horizon, risk tolerances, performance expectations and asset class preferences, an efficient or optimal portfolio was identified. The strategic asset allocation of the Plan can be found in the Executive Summary.



### ***Rebalancing of Strategic Allocation***

When necessary and/or available, cash inflows/outflows will be deployed in a manner consistent with the strategic asset allocation of the Plan. If there are no cash flows, the allocation of the Plan will be reviewed quarterly.

If the Consultant judges cash flows to be insufficient to bring the Plan within the strategic allocation ranges, the Consultant shall decide whether to effect transactions to bring the strategic allocation within the threshold ranges.

### **SECURITIES GUIDELINES AND LIMITATIONS**

These guidelines are designed to apply to those managers with traditional “long only” mandates. Every money manager selected to manage Plan assets must adhere to the following guidelines. The following securities and transactions are not authorized unless receiving prior Board approval:

- Letter stock and other unregistered securities; commodities or other commodity contracts; and short sales or margin transactions.
- Securities lending; pledging or hypothecating securities;
- Investments in the equity securities of any company with a record of less than three years' continuous operation, including the operation of any predecessor.
- Investments for the purpose of exercising control of management.

#### ***Domestic Equities: Guidelines and Limitations***

- Equity holdings in any one company should not exceed more than 5% of the market value of the Plan's equity portfolio.
- Allocation to any one economic sector should not be excessive and should be consistent relative to the broad equity market and to managers following similar style disciplines.
- The manager shall emphasize quality in security selection and shall avoid the risk of a large loss through diversification.
- The managers shall have the discretion to invest a portion of the assets in cash reserves when they deem appropriate. However, the managers will be evaluated against their peers on the performance of the total funds under their direct management.
- The market for individual securities held in the Plan should be large enough to allow for easy liquidation.

#### ***Domestic Equities: Prohibited Securities and Transactions***

- The buying of securities on margin.
- “Short Selling” of securities.
- The buying and selling of futures contracts in any form unless expressly authorized by the Board and documented in writing by the Chairperson of the Board as a hedge against portfolio loss.
- The buying and selling of put and call options on stocks, bonds, indexes, and futures contracts unless expressly authorized by the Board and documented in writing by the Chairperson of the



Retirement Board as a hedge against portfolio loss except for the writing of covered call options (selling call options on shares of stock for which the underlying security is held in the account) as a selling strategy. Options purchases are also permitted as a closing transaction.

- Securities which are not publicly traded such as private placements.

#### ***International Equities: Investment Limitations***

- Equity holdings in any one company shall not exceed more than 5% of the international equity portfolio.
- Allocation to any one economic sector shall not be excessive and should be consistent relative to a broadly diversified international equity market and to managers following similar style disciplines.
- Allocations to any specific country shall not be excessive relative to a broadly diversified international equity manager peer group. It is expected that the non-US equity portfolio will have no more than 40% in any one country.

#### ***International Equities: Prohibited Securities and Transactions***

- The buying of securities on margin.
- "Short Selling" of securities.
- The buying and selling of futures contracts in any form unless expressly authorized by the Board and documented in writing by the Chairperson of the Board as a hedge against portfolio loss.
- The buying and selling of put and call options on stocks, bonds, indexes, and futures contracts unless expressly authorized by the Board and documented in writing by the Chairperson of the Retirement Board as a hedge against portfolio loss except for the writing of covered call options (selling call options on shares of stock for which the underlying security is held in the account) as a selling strategy. Options purchases are also permitted as a closing transaction.
- Securities which are not publicly traded such as private placements.

#### ***Domestic Fixed Income: Guidelines and Limitations***

- All fixed-income securities held in the portfolio should have a Moody's, Standard & Poor's or Fitch's credit quality rating of no less than "BBB". U.S. Treasury and U.S. government agencies, which are unrated securities, are qualified for inclusion in the portfolio.
- No more than 20% of the market value of the fixed income portfolio shall be rated less than single "A" quality, unless the manager has specific written authorization.
- The exposure of the portfolio to any one issuer, other than securities of the U.S. government or agencies, shall not exceed 10% of the market value of the fixed income portfolio.
- The market for individual securities held in the Plan should be large enough to allow for easy liquidation.
- The manager may contract to purchase securities for a fixed price at a future date beyond customary settlement provided that cash or cash equivalents are maintained sufficient to make payment in full.

### ***Domestic Fixed Income: Prohibited Securities and Transactions***

- The buying of securities on margin.
- "Short selling" of securities
- The buying and selling of futures contracts in any form unless expressly authorized by the Board and documented in writing by the Chairperson of the Board as a hedge against portfolio loss.
- The buying and selling of put and call options on stocks, bonds, indexes, and futures contracts unless expressly authorized by the Board and documented in writing by the Chairperson of the Retirement Board as a hedge against portfolio loss except for the writing of covered call options (selling call options on shares of stock for which the underlying security is held in the account) as a selling strategy. Options purchases are also permitted as a closing transaction.
- The buying and selling of foreign bonds and securities not registered through the SEC filing or not denominated in U.S. dollars.
- All securities not offered through and SEC registration filing except U.S. Government or agency-backed mortgages.
- Derivatives securities including Collateralized Mortgage Obligations (CMO's).

### ***Liquid Alternative Investments***

- Alternative Investments are defined as everything other than traditional long stock and bond portfolios. For the purpose of this document, alternative investments shall include any investment that has a low correlation to the domestic equity and fixed income market. This shall include real estate, private equity, hedged investments, commodities, timber, and tactical asset allocation portfolios, among other asset classes. It is the intent of the Retirement Board to achieve this allocation using vehicles as described under the Investment Company Act of 1940.

### ***Cash/Cash Equivalents: In General***

- Cash equivalent reserves shall consist of cash instruments having a quality rating of A-2, P-2 or higher. Eurodollar Certificates of Deposits, time deposits, and repurchase agreements are also acceptable investment vehicles.
- Any idle cash not invested by the investment managers shall be invested daily through an automatic interest bearing sweep vehicle managed by the custodian.

## **SELECTION OF MONEY MANAGERS AND FUNDS**

### ***Selection of Money Managers***

The Consultant, in accordance with the policy statement, will select appropriate money managers to manage the Plan's assets. Managers must meet the following minimum criteria:

- Be a bank, insurance company, investment management company, or investment adviser as defined by the Registered Investment Advisers Act of 1940.
- Provide historical quarterly performance numbers that are compliant with the Global Investment Performance Standard (GIPS), based on a composite of all fully discretionary accounts of similar investment style, and reported net and gross of fees.

- Provide performance evaluation reports prepared by an objective third party that illustrate the risk/return profile of the manager relative to other managers of like investment style.
- Provide detailed information on the history of the firm, key personnel, key clients, fee schedule, and support personnel. This information can be a copy of a recent Request For Proposal (RFP) completed by the manager.
- Clearly articulate the investment strategy that will be followed and document that the strategy has been successfully adhered to over time.
- Selected firms shall have no outstanding legal judgments or past judgments, which may reflect negatively upon the firm.
- Managers must have current information available in at least two of the following databases: Morningstar, PSN, or Callan Associates.

### *Selection of Fund Managers*

The Consultant, in accordance with the policy statement, may also select appropriate mutual funds to manage a portion of the Plan's assets. Mutual funds must meet the following minimum criteria:

- Funds must correspond to the asset classes outlined in the Board's IPS. For example, the growth component of the IPS must be implemented with a mutual fund invested in growth stocks.
- The fund's manager must have been in place for three years or more.
- The funds must have been following the same investment strategy for at least three years.
- The fund must have sufficient assets under management so that any single client does not represent more than 5% of the fund.
- The mutual fund's prospectus shall replace the "securities guidelines" found in this document.

## **CONTROL PROCEDURES**

### *Duties and Responsibilities of the Money Managers*

The duties and responsibilities of each money manager retained by the Plan include the following:

- Managing the Plan assets under its care and/or control in accordance with the IPS objectives and guidelines set forth herein, and also expressed in separate written agreements when deviation is deemed prudent and desirable by the Board.
- Exercising investment discretion (including holding cash equivalents as an alternative) within the IPS objectives and guidelines set forth herein.
- Promptly informing the Board and the Consultant in writing regarding all significant and/or material matters and changes pertaining to the investment of Plan assets, including, but not limited to:



- Investment strategy
  - Portfolio structure
  - Tactical approaches
  - Ownership
  - Organizational structure
  - Financial condition
  - Professional staff
  - Recommendations for guideline changes
  - All legal material, SEC and other regulatory agency proceedings affecting the firm.
- Promptly voting all proxies and related actions in a manner consistent with the long-term interests and objectives of the Plan set forth herein. Each manager shall keep detailed records of said voting of proxies and related actions and will comply with all regulatory obligations related thereto.
  - Utilize the same care, skill, prudence and due diligence under the circumstances then prevailing that experienced, investment professionals acting in a like capacity and fully familiar with such matters would use in like activities for like Plans with like aims in accordance and compliance with applicable laws, rules and regulations from local, state, and federal entities as it pertains to fiduciary duties and responsibilities.
  - Acknowledge and agree in writing to their fiduciary responsibility to fully comply with the entire IPS set forth herein, and as modified in the future.

### ***Brokerage Policy***

All transactions effected for the Plan will be "subject to the best price and execution." Managers will not utilize brokerage from the Plan assets to effect "soft dollar" transactions.

### ***Performance Review***

Investment performance will be reviewed at least quarterly to determine the continued feasibility of achieving the investment objectives and the appropriateness of the IPS for achieving those objectives.

It is not expected that the IPS will change frequently. In particular, short-term changes in the financial markets should not require adjustments to the IPS.

Quarterly performance will be evaluated to test progress toward the attainment of longer-term targets. It is understood that there are likely to be short-term periods during which performance deviates from market indices.

### ***Monitoring of Money Managers/Mutual Funds***

#### ***Quarterly Review***

On a timely basis, but not less than four times a year, the Board will meet to focus on:

- Manager's adherence to the IPS guidelines;
- Material changes in the mutual fund's/manager's organization, investment philosophy and/or personnel; and,
- Comparisons of the mutual fund's/manager's results to appropriate indices and peer groups can be found in the addendum.

The risk associated with each mutual fund's/manager's portfolio, as measured by the variability of quarterly returns (standard deviation), must not exceed that of the benchmark index and the peer group without a corresponding increase in performance above the benchmark and peer group.

### *Annual Review*

In addition to the information covered during the quarterly reviews, the Board will meet at least annually to focus on:

- The manager's performance relative to managers of like investment style or strategy. Each manager is expected to perform in the upper half of the manager's respective style universe.
- The Plan's investment performance results compared to the manager's overall composite performance figures to determine unaccounted for dispersion between the manager's reported results and the Plan's actual results.

### *Replacement Guidelines and Measures*

The Board is aware that the ongoing review and analysis of money managers is just as important as the due diligence implemented during the manager selection process. Accordingly, a thorough review and analysis of a money manager may be conducted, should:

- A Manager perform in the bottom quartile (75th percentile) of their peer group over a 1-year time period.
- A Manager fall in the southeast quadrant of the risk/return scatterplot for a 3-year time period.
- A Manager have a 3-year risk-adjusted return (as measured by the Sharpe Ratio) fall below that of the median manager within the appropriate peer group.

Furthermore, performance which may require the replacement of a Manager include:

- Managers that perform below the bottom quartile (75th percentile) of their peer group over a 3-year time period.
- Managers who perform below the median (50th percentile) of their peer group over a five-year period.
- Managers with negative alphas for a three-year time period.

Major organizational changes also warrant immediate review of the manager, including:

- Change in professionals
- Significant account losses
- Significant growth of new business
- Change in ownership
- Change in investment policy or process

The performance of investment managers will be monitored on an ongoing basis, and it is at the Consultant's discretion to take corrective action by replacing a manager if they deem it appropriate at any time.

Approved by the Lehigh County Employees' Retirement Board:

  
Member

  
Member

12/3/14  
Date

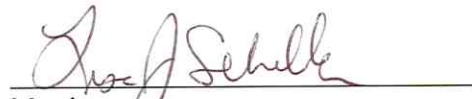
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Member

12/8/14  
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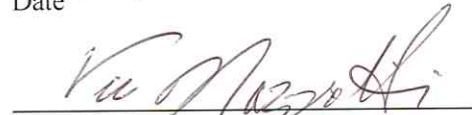
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Date

  
Member

  
Member


12/10/2014  
Date

11/29/15  
Date

  
Member

12-10-14  
Date

Agreed to by Investment Consultant:

  
Consultant

12/1/14  
Date



**ADDENDUM – Indices & Peer Groups**

<b>Asset Category</b>	<b>Index</b>	<b>Peer Group Universe</b>	
<b>Domestic Equities</b>	Large Cap Value	Russell 1000 Value	Large Cap Value Style
	Large Cap Core	S&P 500	Large Cap Broad Style
	Large Cap Growth	Russell 1000 Growth	Large Cap Growth Style
	Mid Cap Value	Russell Midcap Value	Mid Cap Value Style
	Mid Cap Broad	Russell Midcap	Mid Cap Broad Style
	Mid Cap Growth	Russell Midcap Growth	Mid Cap Growth Style
	Small Cap Value	Russell 2000 Value	Small Cap Value Style
	Small Cap Broad	Russell 2000	Small Cap Broad Style
	Small Cap Growth	Russell 2000 Growth	Small Cap Growth Style
<b>International Equities</b>	Large Cap Value	MSCI EAFE Value	Intl Large Cap Value
	Large Cap Core	MSCI EAFE	Intl Large Cap Core
	Large Cap Growth	MSCI EAFE Growth	Intl Large Cap Growth
	SMid Value	MSCI EAFE Small Cap	Lipper: Intl Sm/Mid Value
	SMid Growth	MSCI EAFE Small Cap	Lipper: Intl Sm/Mid Growth
	Small Cap Broad	MSCI EAFE Small Cap	Lipper: Intl Sm/Mid Core
	Emerging Markets	MSCI Emerging Markets	Emerging Mkts Style
	Specialty	MSCI EAFE	Intl Core Eq Style
<b>Global Equities</b>	Large Cap Value	MSCI ACWI	GI Equity Style
	Large Cap Core	MSCI ACWI	GI Equity Style
	Large Cap Growth	MSCI ACWI	GI Equity Style
	Mid Cap Growth	MSCI ACWI	GI Equity Style
	Small Cap Growth	MSCI World Small Cap	GI Equity Style
<b>Fixed Income</b>	Emerging Markets	Barclays Capital Gbl Emer Mkt Bond	Emer Mkt Bond
	Specialty	Barclays Capital High Yield Intermediate	High Yield Style
	High Yield Bond	Barclays Capital High Yield Intermediate	High Yield Style
	Global Bond	Barclays Capital Global Agg	GI Fixed Income Style
	Core Bond	Barclays Capital Aggregate Bond	Intermediate Style
	Core Bond (Long Duration)	Barclays Capital Govt/Credit Long	Ext Maturity Style
	Core Bond (Intermediate Duration)	Barclays Capital Aggregate Bond	Intermediate Style
	Core Bond (Short Duration)	Barclays Capital 1-3yr Govt/Credit	Defensive FI Style
	Core Bond (Multisector Bond)	Barclays Capital US Universal Index	Core Plus Style
	Government Bond	Barclays Capital Gov Inter	Intermediate Style
	Government Bond (Long Duration)	Barclays Capital Gov Long	Ext Maturity Style
	Government Bond (Intermediate Duration)	Barclays Capital Gov Inter	Intermediate Style
	Government Bond (Short Duration)	Barclays Capital Gov 1-3 Yr	Defensive FI Style
	TIPS	Barclays Capital US TIPS	Lipper: TIPS Funds
	Short Term Bond	Barclays Capital 1-3yr Govt/Credit	Muni Bond-S/T DB

**ADDENDUM (continued) – Indices & Peer Groups**

<b>Asset Category</b>		<b>Index</b>	<b>Peer Group Universe</b>
<b>Real Estate</b>	Real Estate Direct	DJ US Real Estate	Lipper: Real Estate
<b>Alternative</b>	Specialty	S&P 500	Core Equity Style
	Moderate Allocation	CPI + 5%	Dom Balanced Style
	TIPS	Barclays Capital US TIPS	Lipper: TIPS Funds
	Real Estate Investment Trust	DJ US Real Estate	Lipper: Real Estate
	Real Estate Investment Trust (Global Real Estate)	DJ US Real Estate	Lipper: GL Real Estate
	Real Estate Direct	DJ US Real Estate	Lipper: Real Estate
	Commodities	DJ:UBS Commodity Index	Lipper: Commodities
	Long-Short	S&P 500	Lipper: Long/Short Equity Funds
	Convertibles	ML Convertible Bonds	Lipper: Convertible Secs
	GTAA	HFRX Global Hedge Fund Index	Absolute Return Hedge FoF
<b>Cash &amp; Equivalents</b>	Taxable Money Market	Citi 90 Day T-Bill	Lipper: Instl Money Mkt