

INVESTMENT OF FUNDS

I. OBJECTIVES

- Understand suitability of investments to the financial requirements of H-GAC
- Preservation and safety of principal
- Financial security and liquidity of H-GAC funds
- Ability to liquidate investments before their maturity should the need arise.
- Diversification of the investment portfolio.
- Maximize interest yield of funds through methods allowed under Federal and State law.

II. RESPONSIBILITY

Planning the investment program is the joint responsibility of the Controller, the Executive Director, and the Investment Officer. The investment program shall be reviewed and approved by the Budget and Finance Committee and Board of Directors prior to its institution. Any policy changes require similar approval.

An investment officer must be designated and approved by the Budget and Finance Committee and the Board of Directors. The investment officer will be responsible for effectively supervising and managing the assets of the investment fund.

H-GAC investments shall be made with judgement and care under circumstances then prevailing that persons of prudence, discretion, and intelligence exercise 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.

III AUTHORIZED INVESTMENTS

The following are authorized investments for H-GAC funds:

1. Obligations of the United States or its agencies and instrumentalities.
2. Direct obligations of the State of Texas or its agencies.
3. Other obligations, the principal of the interest on which are unconditionally guaranteed or insured by the State of Texas or the United States.
4. General obligations of states, agencies, counties, cities, and other political subdivisions of any state having been rated as to investment quality by a nationally recognized investment rating firm and having received a rating of not less than A or its equivalent.
5. Certificates of Deposit issued by State and National banks domiciled in the State of Texas the payment of which is insured in full by the Federal Deposit Insurance Corporation.
6. Fully collateralized direct Repurchase Agreements with a defined termination date purchased pursuant to a master contractual agreement which specified the

rights and obligations of both parties and which requires that securities involved in the transaction be held in a safekeeping account subject to the control and custody of H-GAC.

7. No Load Money Market Mutual Funds and No Load Mutual Funds. To be an allowable investment, money market funds must adhere to a 90-day weighted average maturity. No-load mutual funds with a weighted average maturity of up to 2 years are allowable if they are registered with the Securities and Exchange Commission, invest exclusively in obligations authorized by the Public Funds Investment Act, adhere to the requirements set forth for investment pools and are continuously rated by at least one nationally recognized investment rating firm at not less than AAA or its equivalent. A government may invest no more than 15% of its operating funds (excluding bond proceeds, reserves, and debt service funds) in this type of mutual fund.
8. Time deposits in the Council's depositories.
9. Investment pools created to function as money market funds must mark-to-market daily and maintain a market value ratio between .995 and 1.005. These pools must be continuously rated no lower than AAA, AAA-m or an equivalent rating by at least one nationally recognized rating agency.
10. Banker's Acceptances 1) 270 days or fewer, 2) Liquidated in full at maturity, 3) Eligible Federal Reserve Bank collateral, 4) U.S. Bank rated not less than A-1 or P-1.
11. Any combination of the foregoing.

Any law passed by the Texas State legislature changing the scope of legal investments available to a Council of Governments shall be considered included as part of this Investment Policy.

H-GAC monitors investments upon each maturity and compares interest rates offered from various brokers and the state of Texas to assure that rates are competitive for the market. Such comparisons are reviewed by the investment officer and the CFO before investments are made. The comparison analysis is retained for review.

IV MATURITY OF INVESTMENTS

The Council measures interest rate risk using the weighted average maturity method based on the fund in which the Council makes investments.

For pooled funds, the portfolio is measured using the dollar-weighted average maturity allowed based on the stated maturity date for the portfolio as a whole. (2256.005c)

Portfolio maturities will be structured to meet the liquidity needs of H-GAC first and then to achieve the highest prudent return of interest. When H-GAC has funds that will not be needed to meet current-year obligations, maturity restraints will be imposed based upon H-GAC's investment strategy for each fund. The maximum allowable stated maturity of any individual investment owned by H-GAC is five years unless specific authority is given to exceed this limit.

Reserve funds may be invested in securities exceeding five years if the maturity of such investments is made to coincide as nearly as practicable with the expected use of funds. Any proposed investments in securities exceeding five years maturity must be disclosed to and approved by the Budget and Finance Committee and the Board of Directors including any appropriate time restrictions. The settlement of all transactions, except investment pool funds and mutual funds, is on a delivery versus a payment basis.

I. COLLATERALIZATION REQUIREMENTS

H-GAC's depository accounts must be collateralized. The H-GAC Budget and Finance Committee and the Board of Directors shall select the form of securities pledge contract or surety bond used to secure H-GAC funds. Additional, substitution, or withdrawal of collateral for H-GAC funds shall be subject to approval of H-GAC's Board of Directors.

The Investment Officer is authorized to accept from depositories of H-GAC funds, as security for deposits, the following kinds of securities: Direct obligations of the United States of America backed by its full faith and credit; evidence of indebtedness guaranteed by Federal Intermediate Credit Banks, Federal Land Banks, Banks for Cooperative, Federal Farm Credit System, Federal Home Loan Banks, Federal National Mortgage Association; any general or special obligations (approved by the Attorney General of Texas) issued by a State of Texas public agency payable from taxes, revenues, either or both, provided all of such obligations are rated A or better by a generally recognized national bond-rating agency.

At all times, such securities shall have a market value of not less than 100% of the amount of the deposits secured thereby, adjusted by the insurance coverage provided those deposits by the Federal Deposit Insurance Corporation.

VI WRITTEN CERTIFICATION FROM INVESTMENT FIRMS

H-GAC may conduct business with any broker licensed to do business in the State of Texas and authorized to negotiate transactions on the national stock exchange. Qualified brokers will be approved by H-GAC's Budget and Finance Committee and Board of Directors to conduct investment transactions on behalf of the Council. Any business organization which seeks to sell an authorized investment to H-GAC must provide a written instrument certifying that they have received and thoroughly reviewed H-GAC's investment policy and have implemented reasonable procedures and controls in an effort to preclude imprudent or noncompliant investment activities arising from investment transactions.

The governing body of an entity subject to this subchapter or the designated investment committee of the entity shall, at least annually, review, revise, and adopt a list of qualified brokers that are authorized to engage in investment transactions with the entity.

VII PROHIBITED TRANSACTIONS

The Investment Officer is prohibited from:

1. shorting securities;
2. selling calls on securities owned by H-GAC;
3. entering into reverse repurchase agreements
4. trading in options or futures contracts
5. purchasing mortgage-backed derivatives known as principal only (PO's), interest only (IO's) and inverse floaters;
6. purchasing or selling securities from dealers or public depositories other than those approved by the Budget and Finance Committee;
7. making any other investment transaction on behalf of H-GAC that is prohibited by law or that has not been authorized by the Budget and Finance Committee.

VIII REPORTING REQUIREMENTS

The investment officer is responsible for preparing and submitting quarterly written reports of investment transactions and performance to the Budget and Finance Committee and the Executive Director as described in the Public Funds Investment Act. The report must:

1. Describe in detail the investment position of H-GAC on the date of the report;
2. Be prepared and signed by the investment officer.
3. State the book value and market value of each separately invested asset at the beginning and end of the reporting period by the type of asset and fund type invested;
4. State the maturity date of each directly held separate asset that has a maturity date;
5. Contain a summary statement of each pooled fund group that states the:
 - a. beginning and ending market values for the reporting period, and
 - b. additions and changes to the market value during the period;
6. State the compliance of the investment portfolio of H-GAC as it relates to:
 - a. the investment strategy expressed in H-GAC's investment policy, and
 - b. relevant provisions of Government Code Section 2256.023
7. State the percentage of the total portfolio which each type of investment represents.

In conjunction with H-GAC's annual financial audit, a compliance audit shall be performed for management controls on investment and adherence to the H-GAC's investment policies.

If the investment officer has a personal business relationship with an entity or is within the second degree by affinity or consanguinity to an individual seeking to sell an investment to H-GAC, the investment officer must file a statement disclosing that

personal business interest, or relationship, with the Texas Ethics Commission, the Budget and Finance Committee, and the Board of Directors.

In addition, investment pools must provide investment officers with a disclosure instrument which contains specific and detailed information. Investment pools must provide investment officers with transaction confirmations and a detailed monthly report.

IX CONTINUING EDUCATION

It is H-GAC's policy to provide training required by the Public Funds Investment Act and periodic training in investments for the investment officer through courses and seminars offered by professional organizations and associations in order to insure the quality, capability, and currency of the investment officer in making investment decisions. The investment officer must attend at least one training session relating to the officer's responsibilities within 12 months of assuming duties

X NOTIFICATION OF INVESTMENT CHANGES

It shall be the duty of the investment officer to notify the Budget and Finance Committee of any significant changes in current investment methods and procedures prior to their implementation, regardless of whether they are authorized by this policy or not.