



## **INVESTMENT POLICY**

### **I. PURPOSE**

The purpose of this investment policy is to set forth the investment and operational policies for the management of the public funds of the City of Anoka. These policies are designed to ensure the prudent management of public funds, the availability of operating funds when needed and an investment return competitive with comparable funds.

### **II. OBJECTIVE**

The primary objectives, in priority order, of investment activities shall be:

1. Safety - Safety of principal is the most important objective of the investment program. 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.
2. 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.
3. Investment - The investment portfolio shall be designed with the objective of attaining a market rate of return throughout the budgetary and economic cycles, taking into account the investment risk constraints and liquidity needs. Return on investment is of least importance compared to the safety and liquidity objectives described above.

### **III. STANDARDS OF CARE**

1. Prudence - The standard of prudence to be applied by the investment officer shall be the "prudent investor rule", which stated "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." The prudent investor rule shall be applied in the context of managing the overall portfolio. The investment officer, acting in accordance with this policy and exercising due diligence, shall not be held personally responsible for a specific security's credit risk or market price changes.
2. Delegation of Authority - Authority to manage and operate the investment program is granted to the Finance Director. 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 internal controls to regulate the activities of subordinate officials.

#### **IV. SAFEKEEPING AND CUSTODY**

1. Authorized Financial Dealer and Institutions - A list will be maintained of financial institutions and security broker/dealers authorized to provide investment services. This list will be updated annually. Broker/Dealers may only hold city investments to the SIPC **or additional insurance** coverage amount, **whichever is greater**. Any excess securities shall be delivered to the city's custodian.
2. Internal Controls - The Finance Director is responsible for establishing and maintaining an internal control structure designed to ensure that the assets of the entity are protected from loss, theft or misuse. The internal control structure shall be designed to ensure 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 the costs and benefits requires estimates and judgments by management.

#### **V. SUITABLE AND AUTHORIZED INVESTMENTS**

1. Investment types - Investments by the City are restricted to the permissible investments under Minnesota Statutes 118A.04, 118A.05, and 118A.06. The City may diversify its investments by using the following instruments:
  - a) U.S. government obligations, U.S. government agency obligations, and U.S. government instrumentality obligations, which have a liquid market with a readily determinable market value;
  - b) Canadian government obligations (payable in local currency), certificates of deposit and other evidences of deposit at financial institutions, bankers acceptances, and commercial paper, rated in the highest tier (e.g., A1, P1, F1 or D1 or higher) by a nationally recognized rating agency;
  - c) investment-grade obligations of state, provincial and local governments and public authorities;
  - d) repurchase agreements whose underlying purchased securities consist of the foregoing; and
  - e) money market mutual funds regulated by the Securities and Exchange Commission and whose portfolios consist only of dollar-denominated securities.
2. Collateralization – In accordance with State Law, full collateralization will be required on Certificates of Deposits (amounts exceeding the FDIC level), funds on deposit and repurchase agreements.

#### **VI. INVESTMENT PARAMETERS**

1. Diversification - The investments will be diversified by security type and institution.
2. Maximum Maturities - To the extent possible, the City will attempt to match its investments with anticipated cash flow requirements. Unless matched to a specific cash flow, the City will not directly invest in securities maturing more than ten (10) years from the date of purchase.

#### **VII. REPORTING METHODS**

The Finance Director shall prepare an investment report quarterly, including a management summary that provides a clear picture of the status of the current investment portfolio. This management summary will be prepared in a manner which will allow the City to ascertain whether investment activities during the reporting period have conformed to the investment policy.

The report should be provided to the City Manger and will include the following:

1. A listing of individual securities held at the end of the reporting period including broker and issuer.
2. Unrealized gains or losses resulting from appreciation or depreciation by listing the cost and market value of the securities.
3. Listing of investments by maturity date.
4. Summary of investments by custodial risk credit risk.

**VIII. POLICY EXEMPTION**

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

**IX. THE CITY OF ANOKA INVESTMENT POLICY SHALL BE RATIFIED ANNUALLY**

**Policy History**

Initially Adopted: 02.21.2012

Revised: 09.06.2016

Revised: 06.26.2023