The City of Kenora

Investment Plan

Date: July 14, 2021

200 University Ave., Suite 801
Toronto Ontario M5H 3C6 Canada

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Contents

1. Definitions

Act	Act means the *Municipal Act, 2001*, S.O. 2001, c. 25, as amended from time to time.
Agent	Agent means any administrator, Custodian, payment servicer, External Portfolio Manager, investment counsel, consultant, banker, broker, dealer or other service provider engaged or appointed by ONE JIB and authorized by ONE JIB to exercise any of the functions of ONE JIB, in the manner and to the extent provided in the Regulation, pursuant to a written agreement with ONE Investment and, without limiting the generality of the foregoing, Agent includes ONE Investment.
Asset Allocation	Asset Allocation means the proportions of each Asset Allocation (or Asset Class) in an investment portfolio. The primary Asset Allocations (or Asset Classes) are cash and cash-equivalent instruments, fixed income, equities and equity-equivalent securities. These primary Asset Allocations (or Asset Classes) can be further subdivided into government and corporate bonds, large and smaller cap equities and other widely recognized asset categories. [ONE Investment generally uses the term "Asset Allocation" to refer to the percentage, at the applicable time, of an investment portfolio comprised of cash, fixed income and equities.]
Asset Class	Asset Class means the type of asset category in an investment portfolio. The primary Asset Classes (or Asset Allocations) are cash, cash-equivalent instruments, fixed income equities and equity-equivalent securities. These primary Asset Classes (or Asset Allocations) can be further subdivided into government and corporate bonds, large and small cap equities and other widely recognized asset categories. This term can be used interchangeably with Asset Allocation (defined above).
Asset Weight	Asset Weight means the actual percentage of HISA and/or of a particular Fund in comparison to the entire amount invested in a particular Outcome and also means the actual percentage of HISA and/or of a particular Asset Allocation in comparison to the entire amount invested in a particular Outcome. This term also includes the actual percentage of HISA and/or of a particular Asset Allocation in comparison to the entire amount invested in the investment portfolio.
Authorizing By-law	Authorizing By-law means, with respect to a Participating Municipality, the by-law under which it (i) adopts and undertakes to maintain its IPS, (ii) authorizes the entering into of the ONE JIB Agreement with ONE JIB and the other Participating Municipalities, (iii) approves its completed MCQ, (iv) authorizes the establishment of a Code of Conduct for ONE JIB, and (v) delegates to ONE JIB the authority to appoint its Integrity Commissioner and its Closed Meeting Investigator. Note: an Authorizing By-law of a Participating Municipality can, at the option of council, also be constituted as the Prudent Investor Enabling By-law by

	specifying a specific future date, agreed to by ONE JIB, as the date on which the PI Standard will apply to the Participating Municipality under Section 418.1 of the Act.
Benchmark	Benchmark means an independently verifiable index that is representative of a specific securities market. For the most part the Benchmark is a relevant market index e.g., the S&P/TSX Composite Index, the FTSE/TMX 91 Day T-bill Index, etc. against which investment performance can be compared. ONE Investment generally selects recognized and widely used performance benchmarks which measure total returns expressed in Canadian dollars. ONE Investment may use a single index or a blended index made up of one or more indices.
CFA Institute	CFA Institute means the not-for-profit professional association that administers the Chartered Financial Analyst (CFA) and the Certificate in Investment Performance Measurement (CIPM) curricula and examination programs worldwide, publishes research, conducts professional development programs, and sets voluntary, ethics-based professional and performance reporting standards for the investment industry.
Chief Compliance Officer (CCO)	Chief Compliance Officer means a duly qualified individual who is the most senior officer responsible for the design and implementation of the compliance program for ONE Investment and for the ONE Prudent Investment Program.
Chief Investment Officer (CIO)	Chief Investment Officer means a duly qualified individual who is the most senior person responsible to oversee investments and who advises ONE JIB as to the recommended Outcomes for Participating Municipalities to comply with their IPSs.
Credit Risk	Credit Risk means the possibility that a borrower will not repay a loan or meet other contractual obligations in full on time. One example of credit risk is the risk that a lender may not receive the borrowed principal and interest when due. Another example of credit risk, sometimes referred to as counterparty credit risk, is the risk that a party to a derivatives contract will default and fail to fulfill its obligations.
Custodian	Custodian means a specialized financial institution appointed to have custody and safekeeping of financial assets. Global Custodians may hold assets for their clients in jurisdictions around the world, using their own local branches or other local custodian banks ("sub-custodians" or "agent banks").
Drift	Drift means the deviation from Target Weight. Drift is cause for concern or a trigger for Rebalancing when it reaches or exceeds a certain magnitude for a specified period of time.
ESG (Environmental,	ESG factors mean “indicators used to analyse a (investee) company’s prospects” which are based on measures of its performance on environmental, social, and corporate governance criteria. According to the United Nations Principles of Responsible Investment, environmental issues relate to “the

Social and Governance Factors)	quality and functioning of the natural environment and natural systems", social issues relate to "the rights, well-being and interest of people and communities", and governance issues relate to "the governance of companies and other investee entities."
External Portfolio Managers	External Portfolio Managers means external third-party investment management firms whose investment offerings are accessed by ONE JIB directly or through services provided to a ONE Investment Fund. External Portfolio Managers are agents authorized by ONE JIB in accordance with Part II of the Regulation.
Funds	Funds mean the pooled investment Funds offered as part of the ONE Prudent Investment Program and includes the ONE Canadian Equity Fund, the ONE Global Equity Fund, the ONE Canadian Bond Fund, the ONE Canadian Corporate Bond Fund and the ONE Global Bond Fund, each of which is a Fund. Each Fund constitutes an Investment Fund and a Pooled Fund (defined below).
In-Kind	In-Kind means assets/securities instead of cash. In certain cases Participating Municipalities may transfer securities to ONE JIB that reflect a portion of their MNRI instead of remitting only cash to ONE JIB. As these securities mature ONE JIB would invest the proceeds into the Outcomes specified in the relevant Investment Plan.
Internal Controls	Internal Controls mean a system of controls that may include authorities, policies, procedures, separation and segregation of duties, compliance checks, performance measurement and attribution, reporting protocols, measures for safekeeping of property and data, and the audit process.
Investment Fund	Investment Fund means a pool of money belonging to many investors that is used to collectively purchase stocks, bonds or other securities. This term includes a Fund (defined above) and a Pooled Fund (defined below).
Investment Plan	Investment Plan means the investment plan for a Participating Municipality applicable to its Long-Term Funds and investments that the Participating Municipality does not require immediately, as adopted and maintained by ONE JIB under the Regulation, as the Investment Plan may be amended from time to time.
Investment Policy Statement (IPS)	Investment Policy Statement means the investment policy applicable to a Participating Municipality's investments adopted and maintained by the council of the Participating Municipality for Long-Term Funds under the Regulation, and for Short-Term Funds, as the IPS may be amended from time to time. The IPS may also apply to the money and investments held by the Participating Municipality for the benefit of persons other than the Participating Municipality itself and may make reference to any source of money in which the Participating Municipality may have an indirect interest but which the Participating Municipality has no authority to invest.

Legal List Securities	Legal List Securities mean the securities that are prescribed from time to time in Part I of the Regulation.
Leverage	Leverage means using borrowed money—specifically, the use of various financial instruments or borrowed capital—to increase the potential return of an investment. Typically leverage tends to increase investment risks.
Local Distribution Corporation	Local Distribution Corporation or LDC means a corporation incorporated under section 142 of the Ontario *Electricity Act, 1998*, as amended from time to time.
Long-Term Funds	Long-Term Funds mean money that the Participating Municipality has defined as long-term and characterized as money that is not required immediately in its IPS. Long-Term Funds will be invested in accordance with the Prudent Investor Standard.
Money Not Required Immediately (MNRI)	Money Not Required Immediately means money that is not required immediately by a Participating Municipality, the control and management of which has been given to ONE JIB. There is no universal definition of MNRI and it is at the discretion of each Participating Municipality to determine its MNRI in a way that is appropriate for its circumstances. A Participating Municipality's council must determine its MNRI.
Municipal Client Questionnaire (MCQ)	Municipal Client Questionnaire means a document which is completed by the Treasurer of each Participating Municipality and which includes information on municipal investments and risk preferences that must be reviewed annually.
Municipality	Municipality means the City of Kenora.
ONE High Interest Savings Account (HISA)	ONE High Interest Savings Account means an account created by ONE Investment, into which money may be deposited, that offers competitive interest rates on daily balances. It functions in a similar way as a bank account in that it pays interest and money can be withdrawn on demand without triggering investment gains or losses.
ONE Investment	ONE Investment means the not-for-profit organization founded by CHUMS Financing Corporation and Local Authority Services that serves as an agent of ONE JIB to supply management, administrative and other services required by ONE JIB in the discharge of ONE JIB's duties and responsibilities.
ONE JIB	ONE JIB means ONE Joint Investment Board, established by certain Participating Municipalities (sometimes referred to as the Founding Municipalities) under section 202 of the Act as a Joint Investment Board for purposes of Part II of the Regulation. ONE JIB, as constituted from time to time, is the duly appointed Joint Investment Board for a Participating Municipality and acts in accordance with the Act, the Regulation, the ONE JIB Agreement, including the Terms of Reference, and each Participating Municipality's IPS and Investment Plan.

ONE JIB Agreement	ONE JIB Agreement means the agreement effective as of July 2, 2020, entered into between ONE JIB, the six original Participating Municipalities (sometimes referred to as the Founding Municipalities) and One Investment in accordance with the requirements of the Regulation, pursuant to which ONE JIB has control and management of the Participating Municipality's money and investments that are not required immediately under Section 418.1 of the Act and in accordance with the Regulation.
ONE Legal List Investment Program	ONE Legal List Investment Program means the program in which municipalities and other eligible investors may jointly invest in securities that are prescribed in Part 1 of the Regulation under Section 418 of the Act.
ONE Prudent Investment Program	ONE Prudent Investment Program means the program for municipal investment in respect of which a Participating Municipality has appointed ONE JIB as its Joint Investment Board and has entered into the ONE JIB Agreement. The ONE Prudent Investment Program includes the Prudent Investment Offering (defined below).
Outcome	Outcome means the categories and strategies in accordance with which a Participating Municipality's MNRI may be invested. "Outcome" is used interchangeably with "solution". There are four different Outcome categories. They include the "cash", "stable return", "contingency" and "target date" categories. Each Outcome category shares certain objectives or goals for the MNRI invested in accordance with that Outcome category. The Outcome categories are used by ONE JIB to determine the appropriate Outcome strategies for each Participating Municipality. An Outcome category may have one or more Outcome strategies associated with it. Each Outcome strategy formulated by ONE JIB includes objectives, risk tolerance, liquidity needs, time horizons and Asset Allocations. The Outcome strategies are designed to enable ONE JIB to respond to a Participating Municipality's specific needs and circumstances. A Participating Municipality's Outcomes portfolio consists of its Outcome categories and strategies and the associated investments in the Funds associated with each Outcome strategy. A Participating Municipality's Outcomes portfolio considers a Participating Municipality's MNRI in its entirety and is determined individually by ONE JIB to meet the investment objectives for each Participating Municipality. A Participating Municipality's MNRI may be invested in accordance with several different Outcome categories and strategies.
Outcome Framework	Outcome Framework means the entire set of Outcome categories and strategies authorized by ONE JIB.
Participating Municipality	Participating Municipality means from time to time each of the municipalities for whom ONE JIB acts as the Joint Investment Board under the terms of the ONE JIB Agreement and includes the Participating Municipalities that established ONE JIB (sometimes referred to as the Founding Municipalities).
Pooled Fund	Pooled Fund means a unit trust established under a trust instrument, generally not available to the public, in which institutional, sophisticated or high net

	worth investors contribute funds that are invested and managed by an External Portfolio Manager. Money belonging to various investors is pooled and used collectively to purchase stocks, bonds and other securities. This term includes a Fund (defined above).
Portfolio	Portfolio means any collection of Funds that are grouped together and required for specific purposes.
Proxy Voting	Proxy Voting means the exercise of voting rights attached to the securities under the control and management of ONE JIB under the ONE Prudent Investment Program. ONE JIB may direct the voting of proxies in accordance with ONE JIB's proxy voting policies. In the normal course, ONE JIB and ONE Investment delegate voting of proxies to the applicable External Portfolio Manager pursuant to the investment management agreement with such External Portfolio Manager.
Prudent Effective Date	Prudent Effective Date means the effective date set out in a Prudent Investor Enabling By-law as the date on which the Prudent Investor Standard applies to the Participating Municipality.
Prudent Investment Offering	Prudent Investment Offering refers to the suite of investment products and services used to invest MNRI of the Participating Municipalities. It is inclusive of the Pooled Funds that have been formed for this purpose, HISA accounts associated with ONE JIB activities, and the Outcomes of ONE JIB. The Prudent Investment Offering is included in the ONE Prudent Investment Program (defined above).
Prudent Investor (PI)	Prudent Investor means an investor who makes an investment using the care, skill, diligence and judgment that an investor acting in accordance with section 418.1 of the Act would exercise in making the investment.
Prudent Investor Enabling By-law	Prudent Investor Enabling By-law means, with respect to a Participating Municipality, the by-law under which it makes the Prudent Investor Standard apply to it as at the specific date set out in such by-law under Section 418.1 of the Act.
Prudent Investor Standard	The “Prudent Investor Standard” means the standard of care which requires ONE JIB, when investing money under section 418.1 of the Act, to exercise the care, skill, diligence and judgement that a prudent investor would exercise in making such an investment. The Prudent Investor Standard means that the securities in which a Participating Municipality can invest are not prescribed. The Prudent Investor Standard applies to the entire portfolio of the Participating Municipalities’ Long-Term Funds under the control and management of ONE JIB rather than to individual securities.
Rebalancing	Rebalancing means changing the percentage weight of HISA or of one or more Funds in an Outcome to align each such percentage weight to its Target Weight.
Regulation	Regulation means Ontario Regulation 438/97, as amended from time to time.

Risk	Risk means the uncertainty of future investment returns.
Risk Tolerance	Risk Tolerance means the financial ability and willingness to absorb a loss in return for greater potential for gains.
Securities Lending	Securities Lending means the practice of lending securities to another market participant for a fee. Generally, the borrower is required to deliver to the lender, as security for the loan, acceptable collateral with value greater than the value of the securities loaned. A Securities Lending program is managed by a Custodian on behalf of investors. A Securities Lending program is widely used by institutional investors to generate additional marginal returns on the total portfolio.
Short-Term Funds	Short-Term Funds mean money that is required immediately by the Participating Municipality as described in its IPS and which remains under the control and management of the Participating Municipality. The funds can be invested in securities that are prescribed in Part 1 of the Regulation.
Sinking Fund	Sinking Fund means a fund established in respect of sinking fund debentures into which annual contributions must be made in an amount sufficient, with interest compounded annually, to pay the principal of the particular Sinking Fund debentures at maturity.
Sinking Fund Excess Earnings	Sinking Fund Excess Earnings mean the investment earnings of the Sinking Fund in excess of the earnings required to pay the principal of the particular Sinking Fund debentures at maturity.
Sinking Fund Required Contributions (Annual Sinking Fund Requirement)	Sinking Fund Required Contributions (Annual Sinking Fund Requirement) mean the amount of money to be set aside each year for deposit into a Sinking Fund for each Sinking Fund debenture issue in accordance with the Participating Municipality's debenture by-laws.
Sinking Fund Required Earnings	Sinking Fund Required Earnings mean the investment earnings of the Sinking Fund needed for the Sinking Fund contributions to continue to grow to a value sufficient to repay the principal at maturity for each issue of Sinking Fund debentures.
Target Weight	Target Weight means the original percentage weight of HISA and/or of one or more Funds for a particular Outcome as set out in the Investment Plan for a Participating Municipality. This term can also mean the original percentage weight of one or more Asset Allocations for a particular Outcome.

2. Purpose of Investment Plan

As required under the Act's prudent investor regime, this Investment Plan (Plan) establishes how ONE JIB will invest the City of Kenora's (City or Kenora) money that it does not require immediately (Long-Term Funds or MNRI).

This Plan complies with Kenora's IPS adopted by Council on April 20, 2021 and is based on the information in the Municipal Client Questionnaire (MCQ) dated June 14, 2021. This Plan applies to all investments that are controlled and managed by the ONE JIB on behalf of Kenora.

At least annually, following Council's review of its IPS, the ONE JIB shall review this Plan and update it as needed.

3. Responsibility for Plan

This Plan is the responsibility of the ONE JIB, which has authorized its agent ONE Investment to exercise its administrative investment functions in accordance with the Regulation. The ONE JIB oversees ONE Investment staff using procedures, reports and regular reviews to monitor compliance with the Act, the Regulation and Kenora's IPS.

This Plan is dependent on clear communication between Kenora, ONE JIB and ONE Investment regarding Kenora's needs, which is especially important when investment needs change. To ensure clear communication, ONE Investment employs an MCQ as part of its annual review. It is Kenora's responsibility to update the MCQ on a timely basis and to ensure that ONE Investment is aware of any needs that are not addressed in the MCQ and, as soon as practicable, of any material changes that occur during the year. It is the responsibility of the ONE JIB and ONE Investment to provide liquidity to the extent possible, to adjust to changing needs in a timely fashion, and to communicate any difficulties in so doing as soon as possible to Kenora. The process for communicating changes in the MCQ, IPS and other issues is set out in Appendix A.

4. Custodian

All investments under the control and management of ONE JIB shall be held for safekeeping by ONE Investment's Custodian.

5. Investment Goals and Objectives

Returns on investments have an impact on Kenora's revenues, and therefore a longer-term impact on future years' budgets, and are intended to at least keep pace with inflation over the long run.

Investments may consist of liquid and non-liquid assets, depending on future obligations. Expected investment risks and returns are balanced to create allocations that provide a high probability that Kenora's investment objectives can be achieved.

MNRI will be invested to achieve any or all of the following objectives:

a. Funding contingencies, where returns are reinvested to grow principal over the long-term for large withdrawals in unpredictable situations;
b. Creating stable returns, where the principal is maintained and a reliable stream of returns may be available to spend as/if needed; and,
c. Funding target date projects, where Kenora has an obligation for a specific project at a specific time.

Kenora has identified the following details in Table 1 of its investment objectives for its MNRI according to the classification scheme.

Table 1 - Outcomes Disclosed in Kenora's IPS

Outcome Category	Outcome Strategy	Objective	Risk Tolerance, Liquidity	Investment Horizon
Cash	Cash	Preservation of capital	Low risk; high liquidity	< 3 years
Stable Return	Stable Return	Income generation: To generate returns to fund recurring needs	Moderate risk with emphasis on growth and stable returns, regular liquidity	> 5 years (Perpetual)
Contingency	Contingency	Contributions for unexpected and infrequent events	Higher risk, emphasis on longer-term capital growth with some liquidity	> 5 years (Perpetual)
	Asset mgt reserves	Contributions to generate returns to fund asset management reserves	Higher risk, emphasis on longer-term capital growth; low liquidity	> 10 years (Perpetual)
Target Date	Target Date 3-5 yrs	Preservation of capital	Low risk; high liquidity	3 - 5 years
	Target Date 5-10 yrs	Contributions toward capital projects, mitigate inflation impacts and meet target funding requirements	Moderate risk, liquid	5 - 10 years
	Target Date 10+ yrs	Contributions toward capital projects, mitigate inflation impacts and meet target funding requirements	Higher risk, emphasis on long term inflation-adjusted growth	> 10 years

Kenora's investment needs described in its IPS provide Council's guidance to ONE JIB in determining investment allocations. Additional context from the MCQ and dialogue with the Treasurer were used to interpret the details in Table 1. This informs ONE JIB about Kenora's current goals, objectives, circumstances and risk tolerance, and helps direct how investment allocations will be determined. The allocation of the City's MNRI in this plan is consistent with the details as disclosed in the City's IPS and MCQ.

While individually Kenora's reserve and reserve funds require liquidity, collectively they provide the City with considerable flexibility that should allow some exposure to less liquid investments as/if needed. This is more relevant for reserve and reserve funds with longer investment horizons. However, at present all ONE Investment funds are designed to be highly liquid. Less liquid investments may become available through ONE Investment at a later date.

The City's MCQ segregates MNRI into 2 distinct portions. Firstly, the Citizens' Prosperity Trust Fund (CPTF) is a perpetual trust that is intended to be a source of recurring income for the City, and the General Account, which reflects the aggregated portion of MNRI of the City's municipal reserves. The CPTF balances have a perpetual investment horizon. The City does not plan to spend the initial capital but intends to use the income generated within the municipal budget. Kenora is planning a withdrawal of approximately $3 million from the General Account to fund spending needs in the next 3 to 5 year period, with the remainder of MNRI having a very long time horizon. Table 2 summarizes the expected movements in MNRI arising from the annual MCQ update.

Table 2 - Summary of MNRI Changes and Balances

Investments in ONE Outcomes	**CPTF**	**General**	**Total**
Market value May 31, 2021	23,372,534	18,197,945	41,570,479
Reallocation: from CPTF to General Account	(1,485,519)	1,485,519	-
2020 debt payments (from MRI)	1,556,327	-	1,556,327
Release of WTP reserve fund to operations	-	(1,400,039)	(1,400,039)
Sub Total - In ONE Pooled Funds	$ 23,443,341	$ 18,283,426	$ 41,726,767
In-Kind Securities			
Pledged Securities Value @ May 31, 2021	5,020,597.34	-	5,020,597.34
Residual Cash @ May 31, 2021	73,616.81	-	73,616.81
Total MNRI @ market value May 31, 2021	$ 28,537,555	$ 18,283,426	$ 46,820,981

The City also notes that currently there is considerable uncertainty in their future budget planning. They are currently considering the use of Infrastructure Ontario funding, which may lead to changes in the practice of internal borrowing from the CPTF. The City is also considering a Harbourfront project that may lead to budget changes and may affect MNRI. The City expects that the uncertainty related to these two initiatives will be resolved within the next 12 months, which could result in a revision to MNRI amounts or allocations. This could lead to a more substantive change in the Investment Plan at a later date, when the City has greater clarity on these initiatives.

6. Investment Allocations

6.1 Asset Allocations

Asset allocations for each Outcome are expected to be relatively stable until the next annual review. Any changes to the amounts in each account must be communicated to ONE JIB formally as outlined in Appendix A.

The goals, objectives, constraints and circumstances of Kenora are considered when assigning asset allocations for Kenora based on ONE JIB's Outcomes Framework. These decisions are informed by the requirement to comply with the Prudent Investor Standard as defined in the Act. The Prudent Investor Standard identifies several key considerations that need to be incorporated in the decision-making process, including:

- General economic conditions;
- The possible effect of inflation or deflation;
- The role that each investment or course of action plays within Kenora's portfolio of investments;
- The expected total return on investment and the appreciation of capital; and
- Needs for liquidity, regularity of income and preservation or appreciation of capital.

This Plan takes these considerations into account as follows:

- On March 11, 2020 the World Health Organization declared the outbreak of the coronavirus (COVID-19) pandemic. The Province of Ontario declared a state of emergency on March 17, 2020. The global pandemic remains an ongoing issue that continues to disrupt economic activity. The financial impact of these events continues to create uncertainty for municipal financial planning.
- The pandemic sent Canada into an economic recession in 2020, from which the economy is now showing signs of recovery. Inflation expectations have converged to their pre-pandemic levels and longer-term interest rates have moved higher in response. The COVID-19 pandemic continues to cloud the outlook. This should not directly affect the risk profile of the City or the implementation of this Plan.
- The pandemic-related economic disruptions are likely to fade as vaccination levels rise. This improving economic outlook continues to have a positive impact on financial markets.
- The portions of MNRI that will be needed in the shorter term will be invested in investment strategies with very low risk and high liquidity (such as cash and short-term fixed income) given the economic uncertainty in the near-term.
- The portions of MNRI that are not expected to be needed over the short-term will be invested to take advantage of a longer-term investment horizon to achieve higher returns by investing in equities and bonds. A diversified approach should help to reduce volatility while still offering the potential for investment returns to outpace inflation.

Return assumptions are provided in section 6.6. These return assumptions were based on allocations that the Chief Investment Officer considers appropriate for Kenora and approved by the ONE JIB. As the portfolios will be broadly diversified, these potential returns are expected to be achieved while still maintaining an appropriate risk profile.

6.2 Account Structure

Kenora's MNRI, as disclosed in its MCQ dated June 14, 2021, have been allocated into investment Outcomes based on the ONE JIB's Outcomes Framework, as shown in Table 3 below. The updated MCQ identifies several movements of cash related to the annual update including:

1) A reclassification of MNRI between the CPTF and the General Account as directed by the Treasurer ($1.49 million to General Account).
2) A payment from the General Account to the CPTF Account to reflect repayment of internal borrowing ($1.56 million to CPTF). This will be funded from the MRI portion of the General Account.
3) A release of money from the Water Treatment Plant Reserve Fund to operations (drawdown of $1.4 million from the General Account)

*Table 2 - Investment Allocations based on MCQ update on June 14, 2021**

Outcome	Allocation ($)	Allocation Weight (%)
Stable Return	23,516,958	56.3%
Contingency	15,086,446	36.1%
Target Date 3-5 Years	3,196,980	7.6%
Total	$ 41,800,384	100.0%

* The amounts in this table are representative of the information contained in the MCQ. The values are based on the market value of MNRI on May 31st. The values in Table 3 include the changes noted in table 2. The MNRI amounts to be invested in Pooled Funds includes $73,600 in accumulated coupon income received on In-Kind bonds which will be reallocated to the Stable Return Outcome. The Investment Plan will be implemented based on the allocation weights in Table 3. The dollar value of investments noted in Table 3 may change due to market movements.

Allocations to ONE Prudent Investment Program funds and products appropriate for Kenora's circumstances will be used for each Outcome. The descriptions of these Outcomes, ONE Prudent Investment Program funds and the asset allocations for each Outcome are shown in Appendix B.

6.3 Stable Return Outcome

The Stable Return Outcome is specifically designed to generate income that could be used to fund regular spending in the municipal budget. This Outcome's investment approach is relatively conservative, as it attempts to provide a recurring income stream while also emphasising preservation of capital. All income generated from the Stable Return Outcome will be reinvested. This Outcome has an allocation of 30% to equity investments, which will help generate annual returns to support the municipal budget and potentially provide modest growth in capital over time. The annual income needs of the municipality may be satisfied by selling securities from the Stable Return Outcome as needed. The degree to which balances invested in this Outcome can grow over time is directly influenced by the rate at which drawdowns take place.

About $23.5 million of Kenora's MNRI has been allocated to the Stable Return Outcome which represent CPTF balances. This amount is inclusive of $73,616.81 of accumulated coupons income from the bonds held in-kind, which will be reallocated to the Stable Return Outcome. The objective is to generate income and preserve the CPTF's capital, making the Stable Return Outcome an appropriate choice for this purpose. Some small municipal cashflow identified in the annual MCQ update will lead to minor revisions in the amount invested.

Kenora also has an in-kind bond portfolio that is part of the MNRI portion of the CPTF. Any coupon income or proceeds from maturing bonds in the in-kind bond portfolio during the year will be reinvested into the Stable Return Outcome. Maturities in the 12-month period ending June 30, 2021 will total $1.2 million. The Treasurer has requested to be informed of any reinvestment of monies from in-kind bond portfolio into the Stable Return Outcome for administrative purposes.

The allocation of the Stable Return Outcome is shown in Table 4. Details of asset mix ranges are available in Appendix B. Stable Return funds will be invested based on the following asset mix and will be rebalanced to ensure a consistent risk profile - rebalancing is explained in more detail in section 9. All income will be reinvested to facilitate continued long-term growth in the assets until they are needed.

Table 4 – Stable Return Outcome

Asset Class	% Weight Min	% Weight Target	% Weight Max	Benchmark
Cash	**8**	**10**	**12**	
ONE HISA		10		Bank of Canada 1 Year GIC Rate
Equity	**26**	**30**	**34**	
ONE Canadian Equity Fund		9		S&P/TSX Composite Index
ONE Global Equity Fund		21		MSCI ACWI (All Country World Index)
Fixed Income	**55**	**60**	**65**	
ONE Canadian Government Bond Fund		9		*blended benchmark* - Canadian Government Bonds
ONE Canadian Corporate Bond Fund		9		*blended benchmark* - Canadian Corporate Bonds
ONE Global Bond Fund		42		Bloomberg Barclays Multiverse Index
Total		**100**		

Stable Return Outcome returns and risk are discussed in section 6.6.

Benchmark: 10% Bank of Canada 1 Year GIC Rate + 9% x S&P/TSX Composite Total Return Index + 21% x MSCI ACWI + 9% x *blended benchmark* - Canadian Government Bonds +9% x *blended benchmark* - Canadian Corporate Bonds + 42% x Bloomberg Barclays Multiverse Index.

The *blended benchmark* for Canadian Government Bonds is: 95% FTSE Canada Short Government Bond Index + 5% FTSE Canada 91-Day Treasury Bill Index.

The *blended benchmark* for Canadian Corporate Bonds is 48% the FTSE TMX Canada All Government Bond Index, 40% the FTSE TMX Canada Short Term Corporate A Index, 10% FTSE TMX Canada Universe Corporate AAA/AA Index and 2% the FTSE TMX Canada 91 Day T-Bill Index.

Further discussion on benchmarks is included in Appendix C

6.4 Contingency Outcome

Kenora will need to generate long-term growth for funds within the Contingency Outcome. Contingency funds may be drawn upon to meet unexpected needs and infrequent events. Emphasis on the preservation of purchasing power is a key consideration, and therefore growth in the value of Kenora's investments is emphasized. Details of the allocation of the Contingency Outcome are shown in Table 5. Further detail about the Contingency Outcome allocations is presented in Appendix B. These funds will be invested according to the asset mix set out in Table 5 and will be rebalanced to ensure a consistent risk profile. The rebalancing mechanism is explained in more detail in section 9. All income will be reinvested to facilitate continued long-term growth in the assets until they are needed.

The allocation to the Contingency Outcome will be approximately $15.1 million, which will remain unchanged as a result of the annual update in this Investment Plan. The amounts allocated to the Contingency Outcome include balances in various reserves with investment horizons that could potentially be represented by Target Date Outcomes, including the 5 to 10 Year Outcome and the 10+ Year Outcome. The City's internal cashflow forecasts are for a time horizon up to 5 years. The lack of a clear target for the use of these funds makes an allocation to the Contingency Outcome the most appropriate choice.

Table 3 - Contingency Outcome

Asset Class	% Weight Min	Target	Max	Benchmark
Equity	**55**	**60**	**65**	
ONE Canadian Equity Fund		18		S&P/TSX Composite Index
ONE Global Equity Fund		42		MSCI ACWI (All Country World Index)
Fixed Income	**35**	**40**	**45**	
ONE Canadian Government Bond Fund		6		*blended benchmark* - Canadian Government Bonds
ONE Canadian Corporate Bond Fund		6		*blended benchmark* - Canadian Corporate Bonds
ONE Global Bond Fund		28		Bloomberg Barclays Multiverse Index
Total		**100**		

Contingency Outcome returns and risk are discussed in section 6.6.

Benchmark: 18% x S&P/TSX Composite Total Return Index + 42% x MSCI ACWI + 6% x *blended benchmark* - Canadian Government Bonds +6% x *blended benchmark* - Canadian Corporate Bonds + 28% x Bloomberg Barclays Multiverse Index.

The *blended benchmark* for Canadian Government Bonds is: 95% FTSE Canada Short Government Bond Index + 5% FTSE Canada 91-Day Treasury Bill Index.

The *blended benchmark* for Canadian Corporate Bonds is 48% the FTSE TMX Canada All Government Bond Index, 40% the FTSE TMX Canada Short Term Corporate A Index, 10% FTSE TMX Canada Universe Corporate AAA/AA Index and 2% the FTSE TMX Canada 91 Day T-Bill Index.

Further discussion on benchmarks is included in Appendix C.

6.5 Target Date Outcome

Target Date Outcomes will be managed with the objective of providing for the return of principal, income and capital gains at a target date in the future. All income will be reinvested.

The Treasurer identified reserves that would be appropriate for Target Date Outcomes, all of which reflect balances for the General Account. The City historically has used internal borrowing (from the CPTF) to help fund capital projects but is currently considering the use of Infrastructure Ontario debt financing. Borrowing from Infrastructure Ontario could limit the need for significant drawdowns in MNRI. Approximately $3.2 million will be invested in the Target Date 3-5 Year Outcome, which should provide sufficient liquidity in the coming years.

The annual review resulted in a minor change in the amount allocated to the Target Date 3 to 5 Year Outcome, but the Treasurer indicated that further revisions may be required within 12 months. The City is considering options for a Harbourfront project that may influence the amount of MNRI available for investment. The use of Infrastructure Ontario funding may have a similar impact. As these initiatives are clarified, the City may revise its MCQ.

Due to the relatively short-term time horizon, the potential for capital loss in the Target Date 3-5 Year Outcome will be mitigated by investing primarily in fixed income and cash-like investments. This Outcome has a small allocation to equity investments to enhance its growth potential.

The allocation of this Outcome to individual funds is shown in Table 6. Further detail about Target Date Outcome allocations can be found in Appendix C.

Table 6 - Target Date 3-5 Year Outcome

Asset Class	% Weight Min	% Weight Target	% Weight Max	Benchmark
Cash	**17**	**20**	**23**	
ONE HISA		20		Bank of Canada 1 Year GIC Rate
Equity	**8**	**10**	**12**	
ONE Canadian Equity Fund		3		S&P/TSX Composite Index
ONE Global Equity Fund		7		MSCI ACWI (All Country World Index)
Fixed Income	**66**	**70**	**74**	
ONE Canadian Government Bond Fund		10.5		*blended benchmark* - Canadian Government Bonds
ONE Canadian Corporate Bond Fund		10.5		*blended benchmark* - Canadian Corporate Bonds
ONE Global Bond Fund		49		Bloomberg Barclays Multiverse Index
Total		**100**		

Target Date 3 to 5 Year Outcome returns and risk are discussed in section 6.6.

Benchmark: 20% Bank of Canada 1 Year GIC Rate + 3% x S&P/TSX Composite Total Return Index + 7% x MSCI ACWI + 10.5% x *blended benchmark* - Canadian Government Bonds +10.5% x *blended benchmark* - Canadian Corporate Bonds + 49% x Bloomberg Barclays Multiverse Index.

The *blended benchmark* for Canadian Government Bonds is: 95% FTSE Canada Short Government Bond Index + 5% FTSE Canada 91-Day Treasury Bill Index.

The *blended benchmark* for Canadian Corporate Bonds is 48% the FTSE TMX Canada All Government Bond Index, 40% the FTSE TMX Canada Short Term Corporate A Index, 10% FTSE TMX Canada Universe Corporate AAA/AA Index and 2% the FTSE TMX Canada 91 Day T-Bill Index.

Further discussion on benchmarks is included in Appendix C

6.6 Projected Investment Returns

The prospect for improved returns with acceptable levels of investment risk is a key consideration for any municipality investing under the Prudent Investor Standard. Table 7 below provides a projection of the annual returns for Kenora's investment Outcomes (and consolidated Outcomes). These estimates were derived from an analysis of long-term returns based on conservative capital market assumptions and economic forecasts which the ONE JIB updated on February 17, 2021. HISA return expectations have been updated subsequently to reflect current rates (0.715%). They are presented for information purposes only, and actual investment results may differ materially. The source of returns (recurring income vs capital gains) is not a factor that ONE JIB actively considers. It is essentially not relevant to municipal investors because they are not subject to taxes on investment returns.

Table 7 - Projected Annual Returns

Outcome	Expected Return	Allocation Weight (%)
Stable Return	3.6%	56.3%
Contingency	4.8%	36.1%
Target Date 3-5 Years	2.7%	7.6%
Overall	**3.9%**	100.0%

* The projected overall Expected Return of the asset allocations for ONE Investment Prudent Investor offerings was evaluated by an external consultant, Aon. Their return estimates were revised by the ONE JIB to reflect more current capital market assumptions on February 17, 2021. HISA return expectations have been updated subsequently to reflect current rates. Actual returns may differ.

6.7 Other Accounts

The City has no other accounts ONE JIB must consider.

7. Constraints

Besides those listed below, there are also constraints specific to each externally managed portfolio that are available on the ONE Investment website.

7.1 Environmental, Social and Governance (ESG) Investing

ONE JIB supports ESG investing and incorporates those principles into its investment decision-making through its due diligence processes when choosing External Portfolio Managers. External Portfolio Managers are assessed for their ESG policies. ONE JIB recognizes the practical difficulties of negative screening, whereby securities are excluded based on the nature of their business. ONE JIB's preference is to integrate social responsibility into the investment process with the intent of influencing companies to change their behaviour where appropriate. ONE JIB's approach will necessarily vary by External Portfolio Manager based on a number of factors, including the degree of control exercised by ONE JIB, contractual restrictions and the nature of the investment. Accommodating all requests for specific ESG considerations may not be possible due to availability, costs or other factors.

7.2 Securities Lending

Unitized vehicles that are controlled by an External Portfolio Manager may engage in securities lending if their policies permit such an action. ONE JIB intends to consider securities lending and may introduce a formalized policy to allow securities lending.

7.3 Derivatives

ONE JIB does not intend that derivatives be used in the investment of Long-Term Funds for speculative purposes or to apply leverage to the portfolios for non-hedging purposes. In certain cases, Long-Term Funds are invested in underlying funds where the External Portfolio Manager is authorized under the constituting documents of the underlying funds to use derivatives. In such cases, the External Portfolio Manager shall provide written notice of its intended use of derivatives and the contents of such notice shall be satisfactory to ONE JIB. Generally, the use of derivatives will be permitted where for so long as the derivative instrument or agreement is outstanding, the investment portfolio has a long position or other offsetting position in the underlying asset. For example, derivative instruments may be used for currency hedging, to change portfolio duration or in covered call strategies.

8. External Portfolio Managers

ONE Investment uses External Portfolio Managers to create the portfolios and investment pools (the ONE Investment Pools) used as building blocks in the asset allocation for each Outcome. These External Portfolio Managers are chosen and monitored using a rigorous process, with oversight by

ONE JIB and ONE Investment and input from an external consultant knowledgeable in the asset classes, the range of investment options, and portfolio managers suitable for institutional investors.

9. Rebalancing

Each account's asset allocation will be monitored by ONE Investment. Each investment Outcome will have target weights assigned for each asset class and investment holding, which collectively represent the intended asset allocation for the Outcome. Minimum and maximum weights will also be assigned for asset class allocations, and these weights will guide the rebalancing process. Should the asset class allocation weights deviate outside the minimum or maximum weights noted in Appendix B, the account will be rebalanced as soon as practicable to bring them within the minimum/maximum range. Given variations in market liquidity, transactions will be completed as soon as reasonably viable, taking into account the investment objectives. Typically, such a rebalance will be completed within 30 days of the asset class allocations exceeding tolerances. Cash inflows/outflows will be used to rebalance as much as possible; if they are insufficient, investments will be sold in a commercially reasonable manner and reallocated as required.

Notwithstanding anything else contained herein, ONE Investment will conduct a semi-annual review of all accounts on April 15 and October 15 (or the following business day) each year. Where, based on current fair market value, the variance from target weighting of any holding (Fund or HISA allocation) in any investment Outcome exceeds 2%, the applicable investment Outcome holdings will be rebalanced towards target weights. Investment Outcome holdings showing variance from target weights of less than 2% may, but need not, be rebalanced to restore target weightings. The rebalance typically will take place within 30 days of the semi-annual review dates.

10. Accommodating Cashflow Needs

This Plan is intended to be dynamic and responsive to the changing needs of Kenora. Once informed of changing needs in accordance with the ONE JIB Agreement, ONE JIB may need to revise allocations, deploy incoming monies, or sell units of the investment pools accordingly. Additionally, income from investments will be automatically reinvested and the cashflow needs of Kenora are expected to be financed with the sale of units of the investment pools. Any fee discounts that apply to Kenora are intended to be reinvested into the Target Date 3 to 5 Year Outcome or otherwise directed by the Treasurer.

11. Non-Liquid Assets

11.1 Legacy Investments / Strategic Investments

This section does not apply

11.2 Transitional Investments

This Investment Plan includes a portfolio of bonds that will be held to maturity with all proceeds to be reinvested into the investment Outcomes. These bonds, which reflect In-Kind holdings of MNRI were valued at $5,020,597.34 as at May 31, 2021. These transitional investments are associated with Kenora's CPTF. Coupon income received on these holdings totalling $73,616.81 will be reinvested into the Stable Return Outcome. Full detail on the In-Kind bond holdings are provided in quarterly reporting packages provided to the Participating Municipality and shared with the ONE JIB.

12. Comments by Chief Investment Officer

Certain qualitative factors were considered in assigning the investment allocations. Overall, Kenora's investment horizon is very long, with the CPTF monies representing most of the City's MNRI.

The CPTF is intended to be a perpetual fund that provides a recurring income source for the City's budget. Its long-term nature suggests that a significant allocation to equities will be required to provide the required growth and income. Allocations to the Stable Return Outcome of approximately $23.5 million are intended to achieve these goals. The CPTF also has an In-Kind bond allocation of approximately $ 5 million dollars of which approximately $1.2 million will mature over the next 12 months. Proceeds of the maturing bonds and any coupon income received will be reinvested into the Stable Return Outcome. The CPTF is also used for internal financing of City projects, but the Treasurer is currently investigating the use of Infrastructure Ontario debt financing. This has the potential to lead to a revision of the MCQ within the next twelve months.

The General Account reflects MNRI that represents a portion of the City's reserve accounts. The Treasurer has noted that approximately $3 million of MNRI might need to be drawn down within 5 years, but that the rest of MNRI has a long-time horizon. This Investment Plan allocates approximately $3 million to the Target Date 3 to 5 Year Outcome and about $15.1 million to the Contingency Outcome. As part of the annual review of the Investment Plan, 1.4 million will be drawn down from the General Account to fund the replacement of the water treatment plant. The CPTF will receive a debt repayment from the MRI portion of the General Account of about $ 1.5 million that largely offsets the reallocation noted above. The Chief Investment Officer intends to offset the cash movements before initiating trades in the Stable Return Outcome and the Target Date 3 to 5 Year Outcome to minimize transaction costs.

The Treasurer also noted that the City is considering a Harbourfront project, and Council is expected to make decisions related to this project within the next 12 months that could change spending priorities. Depending on that decision and the status of the Infrastructure Ontario financing, it is possible that a revision in the MCQ may be required before the next annual Investment Plan review. At the time of writing, the recommended overall exposure to equity within the portfolios was 39.0% of MNRI (excluding the In-Kind bond portion), which is an appropriate level for the City.

Appendix A: Process for Communicating Changes in Investment Needs

For effective investment management it is imperative that material changes in Kenora's investment needs be communicated to ONE JIB on a timely basis. These include changes in:

- Risk tolerance;
- The IPS;
- Timeframes and/or estimated amounts for financial obligations, including sooner-than-expected amounts and longer timeframes;
- Revisions in MNRI;
- Desired end use of funds, especially if that is likely to affect the investment approach; and
- Changes in authorized personnel responsible for investments.

These changes must be communicated in writing using the MCQ on the ONE Investment website. Section 5.01 (c) of the ONE JIB Agreement requires that Participating Municipalities provide written notice to the Board Secretary of ONE JIB of any amendment or modification to its IPS. Written communication should be directed to the attention of the Chief Investment Officer at ONE@oneinvestment.ca and the ONE JIB Secretary at dkelly@oneinvestment.ca. They are considered received when ONE Investment provides a formal return email acknowledgment.

Appendix B: Description of ONE Investment Pools, Products and Outcomes

Following is a list of the ONE Investment Funds and products used to achieve target asset allocations. Additional investment products may become available in the future for use in the investment Outcomes, and the list below may be updated from time to time accordingly. For more information on how these ONE Investment Funds and products are managed, please see further detail on the ONE Investment website.

ONE Investment Pool or Product	External Portfolio Manager	Mandate	Asset Class
ONE High Interest Savings (HISA)	Not Applicable	Savings account	Cash
ONE Canadian Government Bond Fund	MFS	Bonds of < 5 years' maturity focused on Canadian Government bonds	Canadian short-term Fixed Income
ONE Canadian Corporate Bond Fund	MFS	Primarily in Canadian Corporate Bonds	Canadian Fixed Income
ONE Global Bond Fund	Manulife Investment Management	Global Unconstrained Fixed Income	Global Fixed Income
ONE Global Equity Fund	Mawer Investment Management	Global Equities inclusive of Emerging Markets exposure	Global Equities
ONE Canadian Equity Fund	Guardian Capital	Canadian Equity with conservative investment approach	Canadian Equities

Investment Outcomes

The asset allocations for ONE Investment's Outcomes are detailed in the tables below. Rebalancing will be managed for these asset allocations as explained in this Plan. As asset allocations drift away from their intended target and converge on either the minimum or maximum ranges noted below, ONE Investment will rebalance the holdings to restore asset allocations towards the target weights. The Outcomes will also be rebalanced twice annually, as required, to ensure the asset allocations do not drift materially away from the target weights. Note that these asset allocations target a maximum of 70% foreign exposure, and Canadian Bond exposure targets equal allocation to the ONE Canadian Government Bond Fund and the ONE Canadian Corporate Bond Fund. ONE JIB may review and amend the asset allocations for the ONE Investment's Outcomes from time to time. Any changes subsequently implemented by ONE JIB that relate to asset allocation weights assigned or holdings included in these Outcomes may supersede the details in the tables below.

Cash Outcome	% Weight		
	Min	Target	Max
ONE HISA	na	100	na
Total Cash		**100**	

Stable Return Outcome	% Weight			Duration
	Min	Target	Max	(Years)
ONE HISA	8	10	12	
Total Cash	**8**	**10**	12	
ONE Canadian Equity Fund		9		
ONE Global Equity Fund		21		
Total Equity	**26**	**30**	**34**	
ONE Canadian Government Bond Fund		9		1.6 – 3.6
ONE Canadian Corporate Bond Fund		9		3.0 – 6.9
ONE Global Bond Fund		42		2.0 – 6.0
Total Fixed Income	**55**	**60**	**65**	
Total Allocated		**100**		

Contingency Outcome	% Weight			Duration
	Min	Target	Max	(Years)
ONE HISA				
Total Cash		**0**		
ONE Canadian Equity Fund		18		
ONE Global Equity Fund		42		
Total Equity	**55**	**60**	**65**	
ONE Canadian Government Bond Fund		6		1.6 – 3.6
ONE Canadian Corporate Bond Fund		6		3.0 – 6.9
ONE Global Bond Fund		28		2.0 – 6.0
Total Fixed Income	**35**	**40**	**45**	
Total Allocated		**100**		

Asset Management Reserve Outcome	% Weight			Duration
	Min	Target	Max	(Years)
ONE HISA				
Total Cash		**0**		
ONE Canadian Equity Fund		27		
ONE Global Equity Fund		63		
Total Equity	**88**	**90**	**92**	
ONE Canadian Government Bond Fund		1.5		1.6 – 3.6
ONE Canadian Corporate Bond Fund		1.5		3.0 – 6.9
ONE Global Bond Fund		7		2.0 – 6.0
Total Fixed Income	**8**	**10**	**12**	
Total Allocated		**100**		

Target Date Outcomes:

Investments with target dates will be managed to reduce risk as the target date approaches. As time passes and the spending needs get closer, it is appropriate to reduce the amount of risk so that there is greater certainty that the required money will be available as needed. This means that reserves, reserve accounts and other balances that are assigned to target date allocations will be reassigned to a nearer dated Target Date Outcome as time passes. In this way, as the date for release of the required money grows nearer, the investments will be migrated to a lower risk Target Date Outcome.

Target Date Outcomes	Target Date 3- 5 Years			Target Date 5-10 Years			Target Date 10+ Years		
	% Weight			% Weight			% Weight		
	Min	Target	Max	Min	Target	Max	Min	Target	Max
ONE HISA		20			0			0	
Total Cash	**17**	**20**	**23**		**0**			**0**	
ONE Canadian Equity Fund		3			15			22.5	
ONE Global Equity Fund		7			35			52.5	
Total Equity	**8**	**10**	**12**	**45**	**50**	**55**	**71**	**75**	**79**
ONE Canadian Government Bond Fund		10.5			7.5			3.75	
ONE Canadian Corporate Bond Fund		10.5			7.5			3.75	
ONE Global Bond Fund		49			35			17.5	
Total Fixed Income	**66**	**70**	**74**	**45**	**50**	**55**	**21**	**25**	**29**
Total Allocated		**100**			**100**			**100**	

Appendix C: Performance Benchmarks for ONE Investment Funds

- The table below details the benchmarks to be used for the performance evaluation of the ONE Investment Pools.
- Blended benchmarks for the prudent investor Outcomes will be used in proportion to their target asset allocation weights.

ONE HISA	Bank of Canada 1 Year GIC Rate
ONE Canadian Equity Fund*	S&P/TSX Composite Total Return Index
ONE Global Equity Fund	MSCI ACWI (net)
ONE Canadian Government Bond Fund*	95% the DEX All Government Short Bond Index and 5% the DEX 91 Day T-Bill Index
ONE Canadian Corporate Bond Fund*	48% the FTSE TMX Canada All Government Bond Index, 40% the FTSE TMX Canada Short Term Corporate A Index, 10% FTSE TMX Canada Universe Corporate AAA/AA Index and 2% the FTSE TMX Canada 91 Day T-Bill Index.
ONE Global Bond Fund	Bloomberg Barclays Multiverse Index

* Note 1: These funds have exposures that broadly parallel ONE Investment Legal List Program products and use the same performance benchmarks.