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ONE JIB Statement of Policy			
Policy:	Prudent Investment – OCIO Compliance Monitoring Policy	Date approved:	Person Most Responsible:
		Date of Next Review:	Chief Compliance Officer

Purpose statement

The purpose of the policy is to establish guidelines and processes for the ongoing monitoring of the Sub-Investment Manager’s compliance processes under the Prudent Investment Program.

Scope

This policy applies to: ONE Investment and ONE Joint Investment Board.

Definitions

- **OCIO Offering** means the comprehensive investment program made available through ONE JIB/ONE Investment pursuant to which a duly qualified investment manager who is an External Portfolio Manager, referred to as a “Sub-Investment Manager” is engaged by ONE Investment to advise a Participating Municipality with regard to the investment of the Participating Municipality’s MNRI and to invest and manage such MNRI in accordance with the terms and conditions set out in the ONE JIB Agreement.
- **Participating Municipalities** 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).

Policy

ONE JIB must fulfill its fiduciary responsibilities by ensuring that all investment decisions are made in the best interest of the Participating Municipalities.

The responsibility in part is fulfilled through regular due diligence evaluating the Sub-Investment Manager’s performance, risk management practices, and adherence to its compliance regime.

Performance and risk management practices of the Sub-Investment Manager are dealt with through the Sub-Investment Manager Review Policy. Adherence to its compliance

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regime is the focus of this policy. The Chief Compliance Officer will report quarterly to ONE JIB on a pre-defined set of metrics providing transparency on whether the Sub-Investment Manager is meeting its compliance obligations.

Compliance Metrics

Compliance by the Sub-Investment Manager will be assessed based on its adherence to RBC GAM Policies and Procedures, attached as Appendix A, including:

- Use of derivatives;
- Securities Lending;
- Leverage;
- Distributions; and,
- Rebalancing – at the client portfolio level based on each Participating Municipality’s risk tolerance within the ONE JIB approved Investment Plan

Review

This policy shall be reviewed at least once every three years.