



## **Investment Policy**

November 24, 2021

### **Policy, Scope, & Objective**

The purpose of this investment policy is intended to provide guidelines for the prudent investment of Casitas Municipal Water District's ("District") reserves. The goal is to invest funds in a manner which will provide the highest investment return with the maximum security while meeting daily cash flow demands. This policy also organizes and formalizes the District's investment related activities, while complying with all applicable statutes governing the investment of public funds.

Except for funds held in the District's working bank accounts used for daily operations and retirement funds held in a trust, it is intended that the investment policy cover all investment activities and financial assets of the District. These funds are accounted for in the annual district audit.

Pursuant to California Government Code 53600.5 and in order of importance the following criteria shall be followed in the investment program.

1. **Safety:** Safety of principal is the foremost objective of the investment program. Investments of the District shall be undertaken in a manner that seeks to ensure the preservation of capital in the overall portfolio.
2. **Liquidity:** The investment portfolio will remain sufficiently liquid to enable the District to meet all operating requirements that might be reasonably anticipated.
3. **Return of Investment:** The investment portfolio shall have the objective of attaining an acceptable rate of return throughout budgetary and economic cycles, taking into account investment risk constraints.

### **Prudence**

Pursuant to California Government Code 53600.3 the "prudent investor" standard shall be used by all persons authorized to make investment decisions and be applied in managing the overall portfolio. Directors of the District ("Board"), Chief Financial Officer, and all persons authorized to make investment decisions on behalf of the District are trustees and therefore fiduciaries subject to the prudent investor standard. When investing, reinvesting, purchasing, acquiring, exchanging, selling or managing public funds, a trustee shall act with care, prudence, and diligence under circumstances then prevailing, including but not limited to, the general economic conditions and the anticipated needs of the District, to safeguard the principal and maintain the liquidity needs of the District.

All persons authorized to make investment decisions on behalf of the District acting in accordance with written procedures and the investment policy and exercising due diligence shall be relieved of personal responsibility for an individual's security credit risk or market price changes, provided deviations from expectation are reported in a timely fashion and appropriate action is taken to control adverse

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developments.

### **Ethics and Conflict of Interest**

All authorized persons involved in the investment process shall refrain from personal business activities that could conflict with the proper execution and management of the investment program, or which could impair their ability to make impartial investment decisions.

### **Responsibilities of the Board of Directors**

- Policy Adoption and Review. Pursuant to California Government code 53646 the Investment Policy and any amendments shall be approved at a public meeting by the Board. The Board shall review the investment Policy annually to determine whether stated investment objectives are still relevant and the continued feasibility of achieving the same.
- Delegation of Authority. Pursuant to California Government Code 53607, the Board shall delegate authority for investment of funds, investment management services, and emergency actions by the board.
- Investment of Funds. The Board delegates the responsibility to invest or reinvest the District's funds or to sell or exchange securities purchased to the Chief Financial Officer, who shall act in accordance with established written procedures for the operation of the investment program consistent with the investment policy. Delegation of this authority shall be reviewed as desired by the Board.
- Investment Management Services. The District can authorize the use of investment management service for District funds. Any change in investment management services must be approved by the Board.
- Emergency Actions by the Board. An emergency meeting of the board will be called whenever necessary to deal with important investment issues that cannot await a regularly scheduled Board meeting.

### **Responsibilities of the Chief Financial Officer**

- Pursuant to California Government Code 53607 the Chief Financial Officer is responsible for investing or reinvesting the District's funds or to sell or exchange securities purchased. They shall be responsible for coordinating and communicating with investment management service provider.
- Annual Review of the portfolio for compliance and shall report to the Board major incidences of noncompliance.
- In accordance with section 53646 of the California Government code they shall submit monthly investment reports to the board. The report shall include the type of investment, issuer, date of maturity, par values and dollar amount invested for all securities, investments and moneys held by the District as well as the current market value as of the date of the report and the source of valuation.
- Annual review of the investment Policy to determine whether stated investment objectives are still relevant and the continued feasibility of achieving the same.
- Maintain written procedures for the operation of the investment program.

### **Responsibility of Investment Management Services**

- The investment management service provider must meet the requirements for authorized financial dealers in accordance with California Government Code 53601.5 and be reputable and trustworthy as well as knowledgeable and experienced with public agency investing.
- Work with the Chief Financial Officer in regards to investing or reinvesting the District's funds or to sell

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or exchange securities purchased while exercising full investment discretion and prudence in the selection and diversification of investments.

- Manage the day-to-day investment of Portfolio assets in accordance with the Policy guidelines and objectives included herein. If at any time the guidelines become too restrictive or possibly injurious to investment returns, they should communicate that information immediately to the Board and Chief Financial Officer.
- Promptly bring to the attention of the District any investment that subsequently fails to meet the policy guidelines, along with a recommendation of retention or disposal.
- Provide timely investment reporting.

### **Authorized Investments**

Pursuant to California Government Code 53601, the District is empowered to invest in the following:

- Bonds issued by the District
- United States Treasury Bills, Notes, and Bonds. There is no limit of the portfolio invested in this category.
- United States Agency Securities
- Certificates of Deposit. Investments is limited to maximum of 30% of the portfolio.
- Corporate Bonds. Investments is limited to maximum of 30% of the portfolio and must have minimum rating of A- / A3 or better (by one rating agency)
- Mutual Funds (that invest in the above securities, including Money Market Funds)
- Municipal Bonds
- Commercial Paper
- Bankers Acceptances
- Repurchase Agreements
- Local Agency Investment Fund (LAIF) and Ventura County's pooled investment fund and shall not exceed 95% of the District's investable assets.

Not more than 10% of Districts funds shall be invested in any one single institution with the exception of United States Government Securities.

No investments shall be made in financial futures or financial options contracts which are otherwise allowed pursuant to Section 53601.1 of the Government Code. No investment shall be made in any security that at the time of the investment has a term remaining to maturity more than five years.

It is the District's full intent, at the time of purchase, to hold all investments until maturity to ensure the return of all invested principal dollars. However, it is realized that market prices of securities will vary depending on economic and interest rate conditions at any point in time.