



<b>Policy Title</b>	Investment Policy
<b>Policy Category</b>	Operational
<b>Number &amp; Version</b>	SVC-COR-PO-067-07
<b>Policy Owner</b>	Finance
<b>Approval by</b>	General Manager and/or Delegations
<b>Effective date</b>	28 December 2019
<b>Date for review</b>	First Year of each term of Council

## 1 STRATEGIC PURPOSE

This policy is to provide a framework for making decisions concerning appropriate investment of Council's funds. The policy also establishes a series of limits within which Council officers should generally operate while investing Council monies.

In setting these limits Council's objective is to maximise returns while controlling the general level of risk that is acceptable for the monies managed on trust for the community.

## 2 POLICY STATEMENT

All investments are to be made in accordance with:

- Local Government Act 1993
- Local Government (General) Regulation 2005
- The Current Ministerial Investment Order
- NSW Trustee Act, 1925
- Local Government Code of Accounting Practice and Financial Reporting
- Australian Accounting Standards Division of Local Government Circulars
- Division of Local Government Investments Guidelines

The key objectives for Councils investment activities are:

- To maximise returns from investment activities while exercising the care, diligence and skill that a "prudent" person would exercise when investing funds.
- To ensure Council has access to necessary cash resources to meet its obligations and operating costs.
- To minimise risks by diversifying across a range of investments
- To invest within the legislative constraints imposed on investments via the Ministers Guidelines
- To achieve or exceed budgeted investment revenue
- To minimise idle cash and thereby maximise the returns on Councils total investable funds

### 3 DEFINITIONS

**Prudent Person** – a hypothetical person used as a legal standard to determine whether someone acted with negligence

### 4 CONTENT

#### **Prudent Person Standard**

Council has a fiduciary responsibility when investing. Council's investments will be managed with care, diligence and skill that a prudent person would exercise. As trustees of public monies, officers are to manage Council's investment portfolios to safeguard the portfolio in accordance with the spirit of this Investment Policy, and not for speculative purposes

#### **Ethics and Conflicts of Interest**

Officers shall refrain from personal activities that would conflict with the proper execution and management of Council's investment portfolio. This policy requires officers to disclose any conflict of interest to the General Manager.

#### **Authorisations and Delegations in Place**

The General Manager has authority to invest surplus funds in accordance with this policy and may delegate this function to the Director of Internal Services and/or Division Manager Finance and IT

#### **Currency**

All investments must be denominated in Australian Dollars.

#### **Authorised Investments**

Investments made after the adoption of this Investment Policy are limited to those allowed by the most current Ministerial Investment Order issued by the NSW Minister for Local Government and include:

- Commonwealth/State/Territory Government security e.g. bonds;
- Interest bearing deposits issued by an authorised deposit-taking institution (ADI);
- Bills of exchange, (< 200 days duration), guaranteed by an authorised deposit-taking institution (ADI);
- Debentures issued by a Council (within the meaning of the Local Government Act 1993);
- Deposits with NSW Treasury &/or Investments in TCorp's Hour Glass Facility; and
- Investments grandfathered under the previous Ministerial Investment Order.

#### **Prohibited Investments**

This investment policy prohibits but is not limited to any investment carried out for speculative purposes, including;

- Derivative based instruments;
- Principal only investments or securities that provide potentially nil or negative cash flow; and
- Standalone securities issued that have underlying futures, options, forwards contracts and swaps of any kind.

This policy also prohibits the use of leveraging (borrowing to invest) of an investment.

#### **Credit and Maturity Guidelines**

Investments are to comply with three key criteria relating to:

- **Institutional Credit Framework:** limit exposure to individual institutions based on their credit ratings;
- **Overall Portfolio Credit Framework:** limit overall credit exposure of the portfolio. And;
- **Term to Maturity Framework:** limits based upon maturity of securities.

**(a) Institutional Credit Framework**

Exposure to an individual institution will be restricted by their credit rating so that single entity exposure is limited, as detailed in the table below with the exception of Councils primary business banker which will be limited to a maximum of 30%

Long Term Rating (Standard & Poors)*	Short Term Rating (Standard & Poors)*	Maximum Percentage of Total Investments
AAA	A1+	30%
AA	A1	25%
A	A2	20%
BBB	A3	15%
Unrated NSW Treasury Corp Hour Glass Facility	Unrated**	30%

\*Or Moody's/Fitch equivalent

\*\* Whilst these funds are unrated they provide a high degree of capital security as all underlying investments are highly rated. In the case of Cash Facility these investments solely invest in minimum A1 short term and AA- long term rated investments and A2 short term and A long term in the case of the Strategic Cash Facility. They also provide Council with monthly income payments, diversification and quick access to funds.

If any of the Council's investments are downgraded such that they no longer fall within the investment policy, they will be divested as soon as practicable. A resolution of Council is required for the early termination of an investment where a potential loss of Capital is to be realised.

The short-term credit rating limit will apply in the case of discrepancies between short and long-term ratings.

**(b) Overall Portfolio Credit Framework**

To control the credit quality on the entire portfolio, the following credit framework limits the percentage of the portfolio exposed to any particular credit rating category. The maximum percentage of the total portfolio that can be held within any one credit rating category is as follows:

Long Term Rating (Standard & Poors)*	Short Term Rating (Standard & Poors)*	Maximum%
AAA	A1+	100%
AA	A1	70%
A	A2	60%
BBB	A3	20%
Unrated NSW Treasury Corp Hour Glass Facility	Unrated**	30%

\*Or Moody's/Fitch equivalent

**(c) Term to Maturity Framework**

The investment portfolio is to be invested within the following maturity constraints:

Fund Type	Term	Maximum weighting as % of allocated investment portfolio
<b>Cash Funds (at call)</b>	0-180 days	<b>0 - 100%</b>
<b>Fixed Interest deposits/FRN's</b>	2 months to less than 1 year	<b>0 - 95%</b>
<b>Fixed Interest deposits/FRN's</b>	1 year to less than 3 years	<b>0 - 25%</b>
<b>NSW Treasury Corp Hour Glass Facility</b>	<b>0 to less than 3 years</b>	<b>0 – 25%</b>

**Liquidity Requirements**

Liquidity refers to the minimum level of liquid funds available to finance day to day requirements. Cash flow must be monitored daily and Council will ensure that it has access to the required funds to meet liquidity needs.

**Performance Benchmarks**

Investment	Performance Benchmark
<b>Cash</b>	<b>11AM</b>
<b>Fixed Interest Deposits/ Floating Rate Note (FRN's)/ NSW Treasury Corp Hour Glass Facility</b>	<b>All 90 day Bank Bill Swap Rate (BBSR)</b>

**Reporting and Reviewing of Investments**

Documentary evidence must be held for each investment and details thereof maintained in an investment Register.

The documentary evidence must provide Council legal title to the investment.

All investments are to be appropriately recorded in Council's financial records and reconciled monthly to the General Ledger.

A monthly report will be provided to Council. The report will detail the investment portfolio in terms of investments currently held by Council, including the investments' maturity date and date investment taken out, interest rate return and the issuing institution.

**Review of Investment Policy and Variation to Investment Policy**

This Investment Policy will be reviewed in the first year of each term of council

The General Manager or the delegated representative is authorised to approve variations to this policy if the investment is to Council's advantage and/or due to revised legislation.

All changes to this Investment Policy are to be reported to Council as soon as practicable with any amendments to the Investment Policy to ultimately be by way of Council resolution.

**Audit Requirements**

Council's external auditors will require independent certification from the relevant financial institutions (banks, fund managers, etc.) to confirm the balance of investments held on Council's behalf at the end of the financial year.

**5 ASSOCIATED LEGISLATION**

- Local Government Act 1993
- Local Government (General) Regulation 2005
- The Current Ministerial Investment Order
- Trustee Act, 1925
- Local Government Code of Accounting Practice and Financial Reporting
- Australian Accounting Standards Division of Local Government Circulars
- Division of Local Government Investments Guidelines

**6 ASSOCIATED COUNCIL DOCUMENTS**

Financial Reserve Management Policy – SVC-FIN-PO-056

**7 HISTORY**

Date	Version Number	Activity log	Resolution Number	Resolution date
	e.g. 0	Amended by Shirley – Review committee to approve		
10.12.2007	4	Amended by John Proctor – Review committee to review and refer to Council		
13.12.2007	4	Review committee referred to Council (former TSC)	M260	13.12.2007
23.7.2013	5	Review by DCCS and Finance Manager (former TSC)	M191	26.9.2013
20.6.2016	6	Review by DFS and Finance Manager (SVC)	M63	30.6.2016
	7	Review by Director Internal Service & Division of Finance and IT		
28.12.2019	7	Approved by Council. Adopted after Public Exhibition 28/12/2019	M382/19	21.11.2019