San Diego City Employees' Retirement System

401 B Street, Suite 400 San Diego, CA 92101-4298 (619) 525-3600

August 15, 2003

Dear Reader:

The Board of Trustees of the San Diego City Employees' Retirement System has established as an earnings goal for the Trust Fund a total, real rate of return of two and one-half percent above the rate of inflation. This goal is to be achieved each year on average over the long term, recognizing that there will be years when the Fund will do better and years when the Fund will do worse.

To accomplish this goal, the Trustees have adopted the attached Investment Manual which addresses fixed income, equity, and real estate investment policies. These policies constitute, along with the applicable State Statutes and Municipal Ordinances, the standards, rules and guidelines by which the Trust Fund must be invested.

The investment policies in The Investment Manual are derived from resolutions and actions formally adopted by the Trustees at regular Board meetings, and the ordinances are derived from actions by the City Council. As either the law or resolutions are amended in the future, the Retirement Office will update The Investment Manual for you by forwarding replacement pages as necessary.

Persons interested in additional information about the Retirement System are encouraged to contact the office at the address above.

Sincerely,

Frederick Pierce, IV President, Board of Trustees

BOARD OF ADMINISTRATION

SAN DIEGO CITY EMPLOYEES' RETIREMENT SYSTEM

GOAL, OBJECTIVES AND POLICIES RELATING

TO

INVESTMENTS

Current as of August 15, 2003

TABLE OF CONTENTS

SF	CT	ION
\circ L		

		<u>PAGE</u>
Intro	duction	5
I.	A. Investment Goal, Objectives and Policies A. Investment Goal B. Investment Objectives C. Trustee's Standard of Care in Administering Trust	6
II.	Seneral Investment Policies A. Authority to Invest and Delegation thereof B. Investment Manager Selection Process	7 7
III.	nvestment Manager Performance A. Performance Measurement B. Performance Objectives C. Deficient Performance	8
IV.	eporting of Performance and Fund Status	10
V.	ustodianship of Investments	11
VI.	sset Transition Management	11
VII.	Asset Allocation of Investments A. Long Range Strategic Planning B. Long-term Asset Allocation Plan and Manager Structure C. Asset Allocation Plan Rebalancing	e12
VIII	Asset Allocation Policies A. General Limitations B. Specific Limitations	14
	1. Diversification	16 16 16
	7. Mortgages	16 16 17

TABLE OF CONTENTS (CONTINUED)

<u>SECTION</u>	<u>PAGE</u>
INVESTMENT RESOLUTIONS I. 92-1 Long Tern Investment Planning II. 92-2 Periodic Investment Reporting	
APPENDICES 1. Approved Countries for SDCERS Investment	cture 25 26
ATTACHMENTS I. Proxy Voting Policy II. Real Estate Strategic Plan Elements & Implementation Pla	

SAN DIEGO CITY EMPLOYEES' RETIREMENT SYSTEM INVESTMENT GOAL, OBJECTIVES AND POLICIES

INTRODUCTION

This Investment Manual is intended to serve as a reference tool and encompasses the investment goal, objectives and policies of the San Diego City Employees' Retirement System (SDCERS) Trust Fund. The investment goal defines the purpose of the SDCERS investment program. The general objectives define the broad philosophy by which Trust Fund assets shall be managed to achieve this goal. The general policies provide guidelines for the Board of Administration of SDCERS (the "Board"), the Investment Committee, the Retirement Administrator and the Chief Investment Officer to follow in meeting the general objectives. A clear statement of the investment goals, specific investment objectives and investment policies are provided in separate sections.

The Board has adopted the specific policies and guidelines incorporated herein. The Board has been and will continue to be guided by the prudent expert rule as set forth in Article 16, Section 17 of the California State Constitution.

The Board may allocate investment responsibility of Trust Fund assets to multiple investment managers and/or the Retirement Administrator subject to both these guidelines and the provisions of Section 144 of the Charter of the City of San Diego. The Board may delegate to the Investment Committee responsibility for appointing and supervising investment managers and Investment Counsel. Investment Counsel is used to assist in asset allocation studies, investment manager performance monitoring and selection reviews, as well as to conduct other research. The Investment Committee is required to report to the Board at least quarterly.

I. INVESTMENT GOAL, OBJECTIVES AND POLICIES

Investment Goal

It is the purpose of the SDCERS investment program to assure that sufficient financial assets are available to provide SDCERS participants and their beneficiaries with all benefits due as specified in the SDCERS Plan. Therefore, the participants' and beneficiaries' financial interests shall take precedence over all other financial interests. In recognition of this, it is the goal of the SDCERS investment program to earn, on a long term average basis, a total real rate of return of at least 2 and 1/2% in excess of the rate of inflation.

B. Investment Objectives

In order to provide sufficient financial assets to pay the present and future obligations of SDCERS, the Board's investment objectives include seeking to earn a reasonable rate of return on Trust Fund assets. Also, the Board places considerable importance on preservation of capital. Therefore, any investment opportunity considered may be entered into only after the associated risk is clearly understood.

C. Trustee's Standard of Care in Administering Trust

The assets of the Trust Fund are to be managed and invested according to the provisions of the California State Constitution, Article 16, Sections 17(c) and 17(d). These state:

- (c) The members of the retirement board of a public pension or retirement system shall discharge their duties with respect to the system with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with these matters would use in the conduct of an enterprise of a like character and with like aims.
- (d) The members of the retirement board of a public pension or retirement system shall diversify the investments of the system so as to minimize the risk of loss and to maximize the rate of return, unless under the circumstances it is clearly not prudent to do so.

II. GENERAL INVESTMENT POLICIES

A. Authority to Invest and Delegation thereof

The Board is authorized by Article IX, Section 144 of the San Diego City Charter to engage the services of one or more investment managers and independent Investment Counsel. Additionally, the Board may delegate to the Retirement Administrator the investment of assets provided such investments are approved by independent Investment Counsel. Once retained, an investment manager must

acknowledge in writing the manager's fiduciary responsibility to the Trust and agree that these objectives and policies will be observed. It is expected that investment managers will at all times conduct themselves as fiduciaries according to California law.

B. Investment Manager Selection Process

The Investment Committee recommends to the Board the selection of outside investment managers to manage designated portions of the Trust Fund. The search and selection process used to identify and screen potential investment managers may utilize the services of independent Investment Counsel to perform the initial and semi-final phases of the process. Also, the initial and semi-final phases of a search and selection process may be performed by the Retirement Administrator through advertisement, through issuance of Request for Proposals (RFP), or through utilization of databases to screen firms for inclusion on a short list for issuance of Requests for Information (RFI).

Final investment manager selection decisions are performed by the Board or, if delegated thereto, the Investment Committee. This final review and selection procedure includes the prospective investment managers making presentations to the decision making body. Additionally, a sub-committee of the decision making body or the Retirement Administrator (or designee) shall physically visit the office of the investment manager selected to be hired and perform a due diligence review of the manager's operations.

The Investment Committee shall administer the Trust Fund's investment program and oversee investment management and custodial fees, consulting fees, transaction costs and other administrative investment costs. No more than reasonable fees consistent with market rates for similar services shall be paid.

III. INVESTMENT MANAGER PERFORMANCE

A. Performance Measurement

Investment manager performance shall be measured and reported in accordance with Resolution 92-2. Performance shall be measured against total Trust Fund objectives and against individual manager objectives. The total Trust Fund shall be measured against inflation, the actuarial assumed rate of return, a universe of other funds, or other appropriate measurements. Investment managers will be measured against stated objectives, a broad universe of managed portfolios and against a smaller universe of portfolios managed by a similar investment style.

B. Performance Objectives

Because SDCERS has adopted a long term orientation to its investment goals, it is expected that both time and adherence to investment policy will be the most important factors in determining whether investment objectives are met. Therefore, performance shall be judged over at least a three to five year period (e.g. market cycle), except as indicated under the "Investment Manager Deficient Performance" section. This performance time horizon is intended to be consistent with the long range investment objectives of the Trust Fund. Additionally, this time horizon is adopted in order to improve the statistical reliability and validity of the performance evaluation process.

Performance objectives for active managers are based upon the expectation that the Trust Fund will achieve value added over and above the cost of active management. The stated performance objectives for the Trust Fund and the various investment manager categories and styles are:

<u>Total Fund</u> - The total Trust Fund objective is to exceed the rate of return of the total fund performance benchmark by the cost of asset management during a three to five year period.

- <u>U.S. Large Capitalization Equity</u> The manager's objectives are: a) to outperform the S&P 500 index by at least 1% (annualized), during a three to five year period; b) to rank in the top 40% of managers investing in a similar style during a three to five year period; and c) to rank in the top 40% of the total universe of equity managers during a three to five year period.
- <u>U.S. Small Capitalization Equity</u> The manager's objectives are: a) to outperform the Russell 2000 index by at least 1.5% (annualized), over a three to five year period; b) to rank in the top 40% of managers investing in a similar style over a three to five year period; and c) to rank in the top 40% of the total universe of equity managers over a three to five year period.

Non-U.S. Large Capitalization and Emerging Market Equity - The manager's objectives are: a) to outperform a blend of the MSCI EAFE and Emerging Market free indices or the MSCI All Country World free ex U.S. index by at least 2% (annualized), during a three to five year period; b) to rank in the top 40% of managers investing in a similar style during a three to five year period; and c) to rank in the top 40% of the total universe of international equity managers during a three to five year period.

Non-U.S. Small Capitalization Equity - The manager's objectives are: a) to outperform the Salomon World Extended Market ex-U.S. index by at least 2% (annualized), during a three to five year period; b) to rank in the top 40% of managers investing in a similar style during a three to five year period; and c) to rank in the top 40% of the total universe of international equity managers during a three to five year period.

<u>U.S. Fixed Income</u> - The manager's objectives are: a) to outperform the Lehman Government Corporate Aggregate index or the Merrill Lynch 1 to 5 Year Government/Corporate index by at least 0.5% (annualized), over a three to five year period; b) to rank in the top 40% of managers investing in a similar style over a three to five year period; and c) to rank in the top 40% of the total universe of fixed income managers over a three to five year period.

Non-U.S. Fixed Income - The manager's objectives are: a) to outperform the Non-U.S. World Government Bond or the J.P. Morgan Non-U.S. Bond index by at least 0.5% (annualized), over a three to five year period; b) to rank in the top 40% of managers investing in a similar style over a three to five year period; and c) to rank in the top 40% of the total universe of fixed income managers over a three to five year period.

Real Estate - The manager's objectives are: a) to outperform the appropriate NCRIEF or REIT sub-index by at least 2% (annualized), over a three to five year period; b) to rank in the top 40% of managers investing in a similar style over a three to five year period; and c) to rank in the top 40% of the total universe of real estate managers over a three to five year period.

C. Investment Manager Deficient Performance

Criteria for evaluating the deficient performance of an investment manager include: underperformance relative to benchmarks and peer groups, investment style drift, organizational changes, compliance issues, and shortfalls in client service. Occurrences of deficient performance by investment managers shall be grouped in two categories.

The "Watch List" category is for shorter-term or moderated levels of underperformance and for minor organizational or compliance issues. Managers

on "watch" will be subject to closer scrutiny and monitoring.

The "Probation" category is for longer-term or more extreme shortfalls in performance and for major organizational or compliance problems. An investment manager whose under performance meets the criteria for placement in the probationary category shall be subject to an Investment Committee formal review and reevaluation of their investment process no less than every six months. Probationary status that persists or worsens can result in the replacement of an investment manager.

The Manager Watch List / Probation Criteria are detailed in Appendix C.

IV. REPORTING OF INVESTMENT PERFORMANCE & TRUST FUND STATUS:

The Board believes timely reporting and communication concerning the status of investments and investment performance are essential. Board Resolution 92-2 defines the investment reporting requirements of SDCERS. In general, equity and fixed income managers shall provide monthly reports to the Investment Committee or the Board. Real estate managers shall provide reports at least quarterly. These reports are to include:

- Composition of assets
- Review of existing and proposed mortgages
- Notice of the portfolio's largest industry or sector representations and holdings
- Portfolio performance compared to the appropriate major index benchmark
- Such other matters as investment managers feel are necessary.

Reports from independent Investment Counsel shall be provided quarterly to the Investment Committee or the Board. These reports are to include:

- Performance of the total Fund
- Performance of the individual managers
- Equity performance
- Fixed income performance
- Real estate performance
- Time-weighted rates of return and rankings
- Such other matters as investment counsel feels are necessary.

V. CUSTODIANSHIP OF INVESTMENTS:

SDCERS shall contract to utilize the services of a custodial bank. The custodial bank shall transfer assets to and from the Trust Fund as directed by SDCERS' staff. Also, the bank shall settle purchases and sales of securities, collect income,

and disperse funds for approved expenditures. Other services provided by the custodial bank include, but are not limited to, cash management and information/accounting services.

The custodial bank shall receive copies of all Trust Fund transactions by investment managers, the Board or others designated by the Board. The custodial bank furnishes independent Investment Counsel all data necessary for counsel to perform performance measurement services. The custodial bank also reports to the Investment Committee all Trust Fund income and expenses, gains and losses, both realized and unrealized.

III. ASSET TRANSITION MANAGEMENT

On occasion, SDCERS may have a need to restructure its portfolios as a result of asset allocation policy changes or as a result of replacing an underperforming investment manager whose account will be restructured. In order to monitor and control asset allocation exposure and minimize transaction costs associated with redeployment of large amounts of capital, the Retirement Administrator is authorized to engage the services of the custodial bank's trading operations or the services of any other responsible transition management service provider. A trading cost analysis shall be obtained on an asset transition restructuring in order to evaluate the results of the transition management and to satisfy SDCERS' fiduciary responsibility to monitor best execution.

In those situations requiring shorter-term interim exposure to asset classes in the course of rebalancing or readjusting the asset allocation structure in accordance with the strategic long-term asset allocation policy, the Retirement Administrator is authorized to engage the services of the custodial bank's trading operations or the services of any capable investment manager currently under contract.

VII. ASSET ALLOCATION OF INVESTMENTS

A. Long Range Strategic Planning

The Board, or the Investment Committee on behalf of the Board, shall determine the long range asset allocation investment policy of SDCERS in accordance with Board Resolution 92-1. Since it is the Board's intent to engage in long-term investment planning, the asset allocation policy shall be structured for at least a three year period. The asset allocation policy shall be developed with the assistance of independent Investment Counsel and address the following considerations:

 Historical and anticipated capital market performance of various asset classes:

- The correlation of returns among various asset classes;
- Inflation, interest rates, and other economic assumptions;
- The difference between the current asset value and the projected asset value of the Plan; and,
- The projected actuarial cost of benefits due.

The asset allocation investment policy shall be reviewed at least annually. A more comprehensive asset and liability projection study shall be performed every three to five years.

B. Long-term Asset Allocation Plan and Manager Structure

Through the annual review process, the Board shall provide the Retirement Administrator with policy direction as to a long-term strategic asset allocation policy and any needed manager structure adjustments to implement the asset allocation policy. The Long-term Asset Allocation Policy and Manager Structure are detailed in Appendix A.

C. Asset Allocation Plan Rebalancing

Through the annual review process, the Board shall provide the Retirement Administrator with policy direction as to the long-term strategic asset allocation policy and any needed manager structure adjustments to implement the asset allocation policy.

The control parameters used to rebalance, adjust and maintain the asset allocation structure in response to market fluctuations shall be reviewed at least every three years. The asset allocation rebalancing policy and control parameters are detailed in Appendix B.

VIII. ASSET ALLOCATION POLICIES

A. General Limitations:

The investment decisions within each managed portfolio shall be solely those of the investment manager, in accordance with the contractual agreement between SDCERS and the manager. Alternatively, the Retirement Administrator may be authorized to exercise certain investment responsibilities. In either case these investment actions, and the reporting of these actions, shall be performed within the bounds of the Board's overall asset allocation guidelines and investment policies for the Trust Fund. These policies are detailed in various Board Resolutions and Appendices of this document.

In order to provide a sound, fiduciary structure to the investment process, the Board has established overall asset allocation guidelines for the Trust Fund.

These guidelines are established after thorough review and analysis of the Trust Fund's projected actuarial liabilities and expected rates of available investment returns and associated risks. These asset allocation guidelines identify the asset classes to be utilized by SDCERS. They designate the percentage exposure to each asset class of the total portfolio. The current asset allocation target percentages and allowable variance (rebalancing) ranges are detailed in Appendices A and B.

These percentages will guide the designation as to which asset class(es) should receive contributions when available. Additionally, the allowable variance ranges shall guide the periodic determination as to which asset class(es) and/or investment manager(s) should be directed to adjust their respective holdings. This shall be done when necessary in order to cause the redistribution of assets to achieve the target allocations.

It is recognized that a specific asset class may become under allocated as a result of poor relative investment performance by an investment manager over one or more market cycles. Additionally, poor relative performance may result from a change in the manager's key investment personnel or a change in the manager's investment style. Should these situations have occurred, the Retirement Administrator is authorized to redistribute assets to achieve the target allocations by selecting and utilizing appropriate, alternative, low transaction cost, interim investment vehicles, as approved by independent Investment Counsel. This authorization shall also be utilized in situations where existing investment managers are unable, for non-performance related reasons, to accommodate redistributions of assets. This may occur due to an investment manager's decision to no longer accept additional funds for investment.

B. Specific Limitations:

The SDCERS investment program shall be conducted, as directed by the Board, under the following specific limitations:

DIVERSIFICATION:

Not more than 5% of the entire Trust Fund's equity portfolio shall be invested in the common stock of any one company nor shall any holding exceed 3% of the outstanding common stock of any one company, at the time of initial commitment:

Not more than 10% of the equity portfolio, at market value, shall be invested in preferred stocks. Not more than 2% of the Trust Fund's equity portfolio shall be invested in the preferred stock of any one company nor shall any holding exceed 5% of the outstanding preferred stocks of any one company, in that particular issue, at market value;

Not more than 10% of the Trust Fund's fixed income portfolio shall be invested in the debt security of any one issue at the time of initial commitment, except for U.S. Government obligations (or agencies and instruments of the U.S. Government);

Pooled investment vehicles and funds for equity, fixed income and cash investments shall be subject to the limitations associated with their primary investment objective. In no case shall an investment in a pool or fund exceed 20% of the market value of said pool, at the time of initial commitment;

Mortgages must be diversified both by area and usage. The combined value of mortgage debt with security interest and other real estate investments shall not exceed 40% of the total of the Trust Fund, at the time of initial commitment;

Real Estate fee simple, co-investments or commingled fund investments must be diversified both by geographic area and property type; and,

Short-term investments also must be diversified as to issuer and type, except for obligations of the U.S. Government or its agencies.

2. EQUITIES:

Trust Fund assets may be invested in equity investments provided: 1) the equity is in a common or preferred stock and sold on a public or registered stock exchange of a country included in an index or benchmark used to measure an investment manager's performance, or is marketable because of the number of shares publicly held and traded; or (2) is in a diversified equity investment fund issued by an investment company registered with the SEC under the 1040 Act. The total investment in equity securities shall not exceed 70% of total assets of that portion of the Trust Fund not invested in real estate oriented investments.

OPTIONS:

Use of options is authorized on a selective basis so long as they are not used to leverage the Trust Funds' portfolios.

4. FINANCIAL FUTURES:

Use of financial futures is authorized on a selective basis so long as they are not used to leverage the Trust Funds' portfolios.

CORPORATE FIXED INCOME SECURITIES:

Trust Fund assets may be invested in debt securities, including convertible bonds, provided the security is issued by a solvent corporation of a country included in an index or benchmark used to measure an investment manager's performance.

6. GOVERNMENT SECURITIES:

Trust Fund assets may be invested in: a) securities issued by the U.S. Government, its agencies, and its instrumentalities; b) securities issued by a country included in an index or benchmark used to measure an investment manager's performance, and that country's provinces, cities, or municipal corporations; or, c) Brady bonds.

7. MORTGAGES:

Trust Fund assets may be invested in mortgages offered by institutions or private parties. The mortgages, the properties and all other factors must satisfy the standards of the Investment Committee or a SDCERS Real Estate Investment Manager.

8. SHORT TERM, LIQUID INVESTMENTS:

The Retirement Administrator of SDCERS is instructed to transfer to the investment managers all assets except those required for administrative expenses, benefit payments, and pending asset allocation commitments. All assets transferred to an investment manager should be invested and remain invested. However, the Board recognizes that investment managers may keep part of the assets under their management in cash or cash equivalents as they deem necessary. Security selections and maturities are the investment manager's prerogative. Short term cash investments shall be subject to credit quality standards and restrictions as identified in the investment manager's contract. Short term cash equivalent investments must be in one or more of the following:

- Certificates of Deposit
- U.S. Treasury Bills, Notes, and other obligations of the U.S. Government or its agencies
- Commercial paper rated A-1 by S&P or P1 by Moody's
- Demand notes of equivalent rating
- Money Market funds
- Bank and trust company short term investment funds (STIF)
- Repurchase and Reverse Repurchase Agreements
- Eurodollars Certificates of Deposit and time deposits of U.S. issuers
- Floating Rate Notes and Certificates of Deposit.

Additionally, the Board recognizes that pending asset allocation commitments may result in the periodic retention of cash reserves for the purpose of funding these approaching commitments. The Retirement Administrator is authorized to direct the investment of these periodic cash reserves by utilization of the above short term liquid investments and/or the utilization of actively managed cash investment vehicles. Actively managed cash vehicles shall be subject to duration or average maturity limitations of 1.0 year or less for investments which are priced to market, or 3.0 years or less for investments which are not

priced to market.

9. REAL ESTATE:

The Board has adopted specific policies and procedures concerning real estate investments. The Real Estate Strategic Plan Elements and Implementation Plan are included in Attachment II.

10. RESTRICTIONS ON ASSIGNMENT OF ASSETS:

Placements of separate account allocations with equity and fixed income investment managers shall not exceed 20%, at the time of initial commitment, of the total assets under management by a manager in a particular style allocation.

INVESTMENT RESOLUTIONS

RESOLUTION OF THE BOARD OF TRUSTEES OF THE SAN DIEGO CITY EMPLOYEES' RETIREMENT SYSTEM PERTAINING TO LONG-TERM INVESTMENT PLANNING

RESOLUTION NO. 92-1

WHEREAS, the Board of Trustees of the San Diego City
Employees' Retirement System wish to engage in long-term
investment planning utilizing asset allocation; and

WHEREAS, the Board believes that a three year outlook is an appropriate period to strategically plan with asset allocation;

NOW THEREFORE BE IT RESOLVED THAT

- (a) at least annually the Board of Trustees will establish asset allocation goals and policies to be accomplished over a three year period;
- (b) succeeding three year goals and objectives will be normally established on the basis of annually adding a succeeding third year.
- (c) in conjunction with the annual review and adoptionof policies for each asset class, the Board of

Trustees will set asset allocation targets as well as discretionary variance range limits around these target allocations. These targets and limits will serve to implement the three year goals.

PASSED AND APPROVED by the Board of Trustees of the San Diego City Employees' Retirement System, this 20th day of March, 1992.

President, Board of Trustees
San Diego City Employees' Retirement
System

ATTEST:		
Secretary	 	

RESOLUTION OF THE BOARD OF TRUSTEES OF THE SAN DIEGO CITY EMPLOYEES' RETIREMENT SYSTEM PERTAINING TO PERIODIC INVESTMENT REPORTING

RESOLUTION NO. 92-2

WHEREAS, the Board of Trustees have delegated to the Retirement Administrator the discretion to implement the policies established by the Board for the investment of San Diego City Employees' Retirement System assets; and

WHEREAS, while it is the responsibility of the Board of Trustees to formulate policy but not the intent of the Board of Trustees to become involved in either the active implementation of that policy or daily operations, it is the duty of the Board to review and monitor the implementation of the policy to assure that those activities are being performed in a prudent manner consistent with the intent of the Board and consistent with the prudent man rule as set forth in Section 16040(b) of the California Probate Code; and

WHEREAS, the Board of Trustees annually reviews and establishes its policy for investments in its asset allocation sessions; and

WHEREAS, the Board of Trustees wishes to be informed and to exercise oversight as to the general principles

established and actions taken by the Retirement Administrator in the implementation of the investment policy,

NOW THEREFORE BE IT RESOLVED THAT

- (a) within 30 days after the annual asset allocations have been established by the Board of Trustees, the Retirement Administrator will issue detailed letters of instruction to the staff of the San Diego City Employees' Retirement System setting forth the principles and procedures for implementing the investment policies and allocations set by the Board;
- (b) no later than the second meeting after the asset allocations have been established by the Board, the Retirement Administrator will report to the Board on the general principles and procedures he has given the staff of the San Diego City Employees' Retirement System for the strategic implementation of the investment policies and allocations set by the Board to the extent that such information can be reported in a public forum without damaging the interests of the Fund;
- (c) no less than quarterly the Retirement Administrator shall, with the assistance of professional

investment counsel, report to the Board of Trustees on the status of:

- (1) real estate investments, commitments, and proposed acquisitions in light of the policies and allocation goals established by the Trustees;
- (2) fixed-income investments in a manner that
 - (i) outlines the net amount of funds invested with each adviser during the quarter;
 - (ii) compares fixed-income performances with a nationally or generally recognized index; and
 - (iii) contains such other information so that

 the Trustees are fully informed about the

 performance of the fixed-income assets

 and allocations of the Fund in light of

 the policies established by the Trustees;
- (3) equity investments in a manner that
 - (i) outlines the net amount of funds investedwith each adviser during the quarter;
 - (ii) compares equity investment performances

 with a nationally or generally recognized

index; and

- (iii) contains such other information so that

 the Trustees are fully informed about the
 performance of the equity assets

 and allocations of the Fund in light of
 the policies established by the Trustees;
- (d) at each monthly meeting the Retirement

 Administrator shall report on the comparison of overall asset allocation policy with actual portfolio status. The monthly report shall indicate the existence of, and reasons for, any excessive deviations that may have arisen between asset allocation policy and the actual status of the portfolio. Additionally, the report shall indicate what corrective action has been taken to rebalance the portfolio to its target allocations.
- (e) at each monthly meeting the Fund's investment advisors shall provide written reports on activities that occurred that month in equities, and fixed-income. Reports on real estate investments shall be provided quarterly. The reports shall include the composition of the investment advisors' portfolios, significant

acquisitions or dispositions since the last report, and the current market value of the assets allocated to the investment advisors' portfolios.

of professional investment counsel, shall report at least quarterly on the Fund's total performance, including the total return of the Fund for the last quarter, the year-to-date, the last year, the last two years, and the last three years.

PASSED AND APPROVED by the Board of Trustees of the San Diego City Employees' Retirement System, this 20th day of March, 1992.

ATTEST:	President, Board of Trustees San Diego City Employees' Retirement System
	Secretary

APPENDIX 1 APPROVED COUNTRIES FOR INVESTMENT

(Amended June 21, 2002)

A country which has an operative financial exchange or over-the-counter market, a convertible currency, and a political, economic and investment structure which facilitates the availability of securities to foreign investors without excessive taxation may be considered for investment by SDCERS. Based upon the above considerations, countries that are included in the appropriate benchmark by which a manager's performance is evaluated are approved for investment.

Any limitations upon the relative exposures to the markets of approved countries shall be specified in the Specific Investment Guidelines of managers retained to invest on an international or global basis on behalf of SDCERS.

APPENDIX A
Long-Term Strategic Asset Allocation Policy and Manager Structure
(Effective 7/18/03)

Equities		
Domestic (38%)		
Large-Cap		7.00/
Growth		7.6%
Value		7.6%
Core		<u>7.6%</u>
-	Subtotal	22.8%
Mid-Cap		
Growth		3.8%
Value		<u>3.8%</u>
	Subtotal	7.6%
Small-Cap		
Growth		3.8%
Value		3.8%
	Subtotal	7.6%
International (15%)		
·	nd Developing Countries)	
`Top Down (6.0%
Bottom Up (6.0%
	Subtotal	12.0%
		,
Small-Cap		3.0%
	Total Equities	53.0%
Fixed-Income		
Domestic (32%)		
Bonds		
Market Dura		20.4%
Shorter Dur		
	tized Market Neutral	9.6%
Convertibles	S	<u>2.0%</u>
	Subtotal	32.0%
International (5%)		5.0%
,		
	Total Fixed-Income	37.0%
Real Estate (10%)		
REITs		2.5%
Direct, Net Lease and Co-	Investments	7.5%
=, =	Subtotal	10.0%
		10.070
	Total Allocation	<u>100.0%</u>

APPENDIX B (formerly included in Resolution 92-3) Asset Allocation Plan Rebalancing

(Revised 2/16/01, 5/21/04)

The Board of Trustees has adopted an asset allocation re-balancing policy which stipulates that target allocations to asset categories or to asset managers within asset categories not be allowed to exceed certain tolerance ranges specific to the expected volatility of each asset category and sub-category defined in standard deviations as follows:

<u>Domestic Equities</u> + or - 2.30 std. dev. Factors

International Equities + or - 2.30 std. dev. Factors

Global Fixed Income, including all marketable

debt and mortgages + or - 2.30 std. dev. factors

Institutional Real Estate + or - 2.30 std. dev. factors

And, the Board of Trustees directs staff:

- (i) to monitor the Trust Fund periodically and/or in response to extraordinary situations impacting investment market volatility; and
- (ii) to determine whether or not any asset category is out of balance with its target asset allocation in excess of the specified tolerance range; and
- (iii) to determine whether or not any investment manager within each asset category is out of balance with their target allocation in excess of the specified tolerance range; and
- (iv) to initiate the process of instructing the relevant investment managers to liquidate the appropriate dollar value of securities and reallocate the cash thus generated to the category(s) or investment manager(s) necessary to bring the Trust Fund back into balance with the adopted target allocations; or
- (v) to initiate the process of instructing the relevant investment managers to redirect cash income (interest coupon and dividends), in concert with an evaluation of other cash flows (employer and employee contributions) and pending commitments, in order to redirect cash to the category(s) or investment manager(s) necessary to bring the Trust Fund back into balance with the adopted target allocations.

Progress made toward attaining these goals will be reported to the Board of Trustees by the Retirement Administrator as set forth in Resolution 92-2.