

**PUBLIC SCHOOL RETIREMENT SYSTEM
OF THE CITY OF ST. LOUIS
INVESTMENT AND OPERATING GUIDELINES
JUNE, 2004**

I. GENERAL

- A. The Public School Retirement System of the City of St. Louis ("PSRSSTL") is a defined benefit retirement plan established to provide retirement benefits to participants in accordance with the specific provisions of R.S.Mo. §§169.410 - 169.540 and the general provisions of R.S. Mo. §§169.560 - 169.597 and R.S. Mo. §§ 105.660 - 105.691 (collectively the "PSRSSTL Statutes").
- B. These Investment and Operating Guidelines are issued pursuant to Rule XIV of the PSRSSTL Rules and Regulations for the guidance of fiduciaries, including the PSRSSTL staff, investment consultant, other investment professionals and the investment managers ("Managers") in the course of investing the retirement funds ("Fund") of the PSRSSTL and to assist in measuring the performance of the Managers and the Fund. These guidelines supplement the formal Investment Policies of the PSRSSTL Board of Trustees as set forth in Chapter A, Rule XIV of the PSRSSTL Rules and Regulations and should be read in conjunction therewith.

II. PERFORMANCE OBJECTIVES

- A. Total return on Fund assets shall consistently rank in the top half of the investment consultant's Public Total Funds Universe, and shall meet or exceed the return of the PSRSSTL Policy Index. "Total return", as used herein, includes income less expenses plus realized and unrealized gains and losses in the PSRSSTL assets. (See Appendix I for an explanation of the Policy Index.)
- B. Appendix III to these guidelines provides specific guidance regarding individual Manager assignments or classifications, benchmarks, and guideline exceptions. Appendix III, combined with the applicable sections of these guidelines and the PSRSSTL Rule XIV, provide a complete statement of investment objectives, rules and guidelines for each investment Manager, exclusive of rules or guidelines directly incorporated into contracts or other similar agreements.
- C. Total Fund risk exposure and risk adjusted returns will be regularly evaluated and compared to the investment consultant's Public Total Funds Universe. Total Fund risk exposure is expected to be midrange (25th to 75th percentile) relative to the investment consultant's universe of public total funds. Risk-adjusted returns are expected to rank consistently in the top half of the investment consultant's Public Total Funds Universe over time. (See Appendix I for an explanation of risk adjusted returns.)
- D. Equity Managers
 - 1. Total return for domestic equity specialist Managers shall meet or exceed the Standard & Poor's 500 stock index or an appropriate index based on the Manager's style and consistently rank in the top half of the investment consultant's appropriate Domestic Equity Specialist Fund Universe.
 - 2. Total return for international equity specialist Managers shall meet or exceed the Morgan Stanley EAFE (Europe, Australia and Far East) International Index and consistently rank in the top half of the investment consultant's universe of Developed International Equity Specialist managers. Emerging international equity Managers shall meet or exceed the Morgan Stanley Emerging Markets Free Index and rank in the top half of the investment consultant's Emerging International Equity Funds Universe.

E. Fixed-Income Managers

1. Total return for domestic fixed-income Managers shall consistently meet or exceed the Lehman Brothers Aggregate Bond Index or an appropriate index based on the Manager's style, and consistently rank in the top half of the investment consultant's appropriate domestic Fixed Income Specialist Fund Universe.
2. Total return for global fixed income Managers shall meet or exceed the Citigroup World Government Bond Index or an appropriate index based on the Manager's style and consistently rank in the top half of the investment consultant's universe of Global Fixed Income Specialist managers.

F. Real Estate Managers

The performance objectives for each Manager, over a three-year to five-year period, are to outperform the consumer price index (CPI) plus 4% after fees using a time-weighted rate of return calculation. The CPI-All Urban Inflation Index should be used. In addition, the Managers shall be compared to the Frank-Russell NCREIF Property Index or appropriate index based on the Manager's strategy and to the investment consultant's real estate fund universe.

G. Private Capital Market Investments and Absolute Return Strategies as defined in Rule XIV

1. Achieve a market rate of return commensurate with the perceived risk for each investment undertaken.
2. Investment returns will be compared to the return on similar investments that originated during the same period.

H. Normally results will be evaluated over a three-year to five-year time horizon, but shorter-term results will be reviewed regularly and earlier action taken if the Board of Trustees, in its sole discretion, determines such action to be in the best interest of the Fund.

III. ASSET ALLOCATION POLICY

In order to have a reasonable probability of consistently earning the long-term target return, the PSRSSTL Board of Trustees ("Trustees") has adopted the asset allocation policy contained as Appendix II to these guidelines.

IV. INVESTMENT GUIDELINES

A. Rule XIV authorizes the adoption of such policies, procedures and limitations as are necessary, advisable or appropriate for the management of the Fund or any asset class component of the Fund. Toward this end, Managers shall manage their holdings in compliance with the provisions set forth below.

B. Domestic Equity Managers

1. Equity Managers will be expected to manage their holdings in order to maximize net long-term returns. It is contemplated that the equity specialist Managers, except the equity component of

balanced portfolios, shall normally be fully invested, maintaining a 90-100% equity commitment level. Managers should determine that the securities to be purchased are of an investment grade suitable for their accounts.

2. A single company, except mutual funds, shall neither exceed 6% of the market value of an equity Manager's total portfolio at purchase nor increase to 8% of the Manager's total portfolio.
3. No purchase shall be made by a Manager, which would cause a holding to exceed 6% of the market value of the issue outstanding.
4. There shall be no short selling, securities lending, use of financial futures or other specialized investment activity without the prior approval of the PSRSSTL.
5. Equity Managers may invest up to 10% of their portfolios in reserve and cash equivalent investments. However, these investments should be made primarily on the basis of safety and liquidity and only secondarily by yield available. Such securities shall carry ratings the equivalent of Standard & Poor's Corporation A1 or Moody's Investors Service, Inc. P-1.

C. Domestic Fixed-Income Managers

1. Fixed-income securities are to be selected and managed to ensure appropriate quality and maturity exposure, consistent with these guidelines and current money market and economic conditions. "Active" bond management (both for the fixed-income portion of the balanced portfolios and within fixed-income specialist portfolios) is encouraged, as deemed appropriate by the Managers. Fixed-income specialists, except the fixed-income portion of balanced portfolios, may vary their bond commitments from 90-100% of assets under their discretion.
2. As provided in the PSRSSTL Rule XIV, domestic debt securities may include U.S. Government and Agency obligations, corporate bonds, asset backed securities, agency guaranteed mortgage pass-through securities, and low risk collateralized mortgage obligations of comparable or lower risk, such as Planned Amortizations Class Level 1 and Sequentials, commercial paper, certificates of deposit and other instruments deemed prudent by the Managers.
3. No security, except issues of the U.S. Government or its agencies or mutual funds, shall comprise more than 6% of the Manager's total portfolio of assets, measured at market. Further, no individual portfolio shall purchase more than 6% or hold more than 10% of its assets in the securities of any single issuer, excepting issues of the U.S. Government or its agencies. (For mortgage-backed securities, an issuer is defined as a separate trust.)
4. The average duration (interest rate sensitivity) of an actively managed portfolio shall not exceed seven years. (See Appendix I for an explanation of "duration".)
5. The diversification of securities by maturity, quality, sector and coupon is the responsibility of the Manager.
6. There shall be no use of options, financial futures or other specialized investment activity without the prior approval of the PSRSSTL.

7. The overall average quality of each high-grade fixed income portfolio shall be AA or better. The average quality rating of the securities held in a high yield portfolio shall be "B" or better.

D. International Equity Managers

1. International equity securities are expected to be issued by non-U.S. corporations, although the Manager, if authorized, may have latitude to hold U.S. securities provided that such investments are consistent with attainment of the portfolio's investment objective. An international Manager employing an active currency management program may, upon specific authorization of the PSRSSTL, deal in futures and options within the discipline of that currency management program.
2. These portfolios should be considered as "equity funds" and shall normally be fully invested, maintaining a 90-100% equity exposure.
3. Decisions as to the number of international equity issues held and their geographic distribution shall be left to the Managers, provided that equity holdings in any one company, excluding mutual funds, may not exceed 6% of the market value of the Manager's total portfolio without the consent of the Trustees.
4. Short-term reserves may be held in U.S. dollar denominated securities or investment vehicles available through the PSRSSTL custodian.
5. Subject to limitations that may be contained in the PSRSSTL Rule XIV, Managers may enter into forward exchange contracts on currency provided that use of such contracts is designed to dampen portfolio volatility or to facilitate settlement of securities transactions, rather than to leverage portfolio risk exposure.

E. Global Bond Managers

1. The PSRSSTL global fixed-income portfolios should be considered as "bond funds" and shall normally be fully invested, maintaining a 90-100% bond exposure.
2. Short-term reserves may be held in investment vehicles available through the PSRSSTL custodian or deposit accounts at the PSRSSTL custodian or sub-custodian banks in U.S. currency or local currencies. Short-term funds must be rated A1 (S&P) or P1 (Moody's) or the equivalent using similar credit criteria.
3. Decisions as to the number of issues held and their geographic distribution shall be left to the Manager.
4. Upon specific authorization of the Trustees, global Managers may employ an active currency management program and deal in futures and options within the discipline of that currency management program. In the context of an active currency management program, cross currency and proxy hedging is allowed. The use of such contracts is designed to dampen portfolio volatility rather than leverage portfolio risk exposure. Currency contracts may also be used to either hedge the portfolio's currency risk exposure or in the settlement of securities transactions.

5. The overall average quality of each global fixed-income portfolio shall be A or higher. Non-rated issues may be purchased, provided that in the judgment of the Manager, they are of a quality sufficient to maintain the average overall portfolio quality of A or higher.
6. The average duration (interest rate sensitivity) of an actively managed global fixed-income portfolio shall not differ from the passive benchmark by more than two years.

F. Balanced or Tactical Asset Allocation (TAA) Managers

1. Equity and fixed-income investments or cash commitment in the TAA portion of the Fund may vary from 0% to 100% of assets under management.
2. Within each asset class, the TAA Manager is subject to the relevant guidelines outlined above.
3. Fully covered or protected investments using options, futures or short sales are permitted in the interest of reducing volatility and protecting capital or changing asset mix.

G. Private Markets Investments and Absolute Return Strategies (*broadly classified as alternative investments*)

1. Alternative investments are intended to enhance the diversification of the Fund and to achieve a market rate of return commensurate with the perceived risk of each investment.
2. The Trustees recognize that alternative investments are potentially more risky than other investments of the Fund. As such, extra care shall be taken in evaluating and fully understanding all aspects on an alternative investment opportunity.
3. All investments must have a mechanism for exit.
4. References on the sponsor, investment adviser, manager, general partner or other person(s) performing substantially the same function (regardless of title) must be checked prior to investing in a fund, partnership or other investment vehicle.
5. An investment screening and review committee may be established to pre-qualify investment proposals. Evaluation of proposals will address the manager, the fund focus and strategy, and the fund structure.
6. The private markets investments will be diversified to reduce the risk of any single investment on the total Fund.
7. All investments must have complete transparency and policy compliance reporting.
8. No more than 25% of the assets earmarked for private markets and absolute return strategies should be invested with a single manager, general partner, or single fund, with the exception of fund of funds.
9. Preference will be given to those funds where the general partner is contributing at least 1% of the total fund.

10. The alternative investments program shall be diversified to limit the exposure to any one investment to 2% of the Fund's total assets.
11. Reserves for future alternative investments may be held in large capitalization U.S. equities or domestic fixed income, as appropriate, subject to the investment guidelines for such investments.

H. Real Estate Investments

1. The role of the real estate segment is to provide a stable return premium, after inflation, and to increase the diversification of the overall Fund.
2. Real Estate Managers will have full discretion to invest portfolios in accordance with the terms of their investment strategies. It is expected that the Managers will adhere to their stated philosophies and that any material deviation will be communicated promptly to the Trustees.

I. General Guidelines

1. Full discretion shall be granted to the Managers regarding their portfolio diversification, the selection of securities, and the timing of transactions, within the parameters of the objectives and guidelines described herein and in the PSRSSTL Rule XIV.
2. While the PSRSSTL is sensitive to excessive turnover, there shall be no specific limitation in this regard, recognizing the importance of providing flexibility to the Managers to adjust their asset mix in changing market conditions.
3. The flexible management of the portfolio is permitted, and while the PSRSSTL is appropriately sensitive to book losses, there is no justification to hold a particular security, or to manage the collective assets, for the sole purpose of avoiding the recognition of a book loss.

V. BENEFIT PAYMENTS

Managers should assume that withdrawals may be made from their portfolios from time to time to pay benefits. The PSRSSTL Executive Director shall provide an annual projection of cash needs, updated on an interim basis, and an estimate of the drawdown requirements from their portfolios. Accordingly, appropriate liquidity should be maintained to fund these withdrawals without impairing the investment process.

VI. STANDARDS OF INVESTMENT PERFORMANCE

Performance of the Fund and individual Managers will be evaluated on a regular basis. Consideration will be given to the degree to which performance results meet the goals and objectives as set forth herein and in the PSRSSTL Rule XIV. Toward that end, the following standards will be used in evaluating investment performance.

- A. Managers will be deemed to have performed satisfactorily when compared with:
 1. the objectives set, and
 2. other similarly managed funds.

- B. In addition to reviewing each Manager's results, the PSRSSTL will re-evaluate, from time to time, its progress in achieving the objectives set for the Fund overall. This re-evaluation will involve an assessment of the continued appropriateness of (1) the manager structure; (2) the allocation of assets among the Managers; and (3) the investment objectives for the Fund.
- C. The Trustees may appoint investment consultants to assist in the ongoing evaluation process. The consultants selected by the Trustees are expected to be familiar with the investment practices of similar retirement plans and will be responsible for suggesting appropriate changes in the investment program over time.

VII. WATCH LIST / PROBATION

- A. Managers to the PSRSSTL may be placed on a watch list or on probation in response to: significant changes in the ownership structure or key personnel; anticipated changes in the investment process; concerns about the Manager's recent or long term investment results; failure of the Manager to comply with any of the investment guidelines; or, any other event which the PSRSSTL staff or investment consultant conclude may lead to a change in the Manager's status with the PSRSSTL.

As an example, the process leading toward probationary status with regard to long term under-performance will normally be as follows:

A Manager will be placed on probationary status if, over eight consecutive quarters, both of these conditions exist:

1. the Manager has failed to meet the return of the benchmark index, and
 2. during this same period the return has not achieved median ranking in comparison to the Manager's assigned peer group.
- B. A Manager may be placed on the watch list or on probation for under-performance in a lesser time period or other actions may be taken if deemed appropriate.
 - C. Any Manager on the watch list or in probationary status will not be eligible to receive additional investment funds.

VIII. REPORTING REQUIREMENTS

- A. Monthly reports provided by each Manager shall contain the following information:
 1. The portfolio composition at book (cost) and at market value by sector, including, minimally, equity, fixed-income, cash equivalents and uninvested cash balances.
 2. Position, by individually named securities, showing both their respective book and market values.
 3. All principal and income cash transactions, including sources of all interest and dividends in sufficient descriptive detail.

4. In the case of commingled funds, the information supplied monthly will consist of the cost and market value of fund shares, the number of shares owned and all principal and income cash transactions.
- B. Quarterly reports provided by each Manager within 30 days after the end of each calendar quarter shall contain the following information:
1. Review of Organizational Structure
 - a. Organizational changes (i.e., ownership)
 - b. Departures of/additions to key investment staff
 - c. Total assets and accounts for product managed for the System
 - d. Change in assets/accounts (i.e., Gains \$ / Losses \$) since last report
 2. Summary of Investment Guidelines
 - a. Summarize guidelines and objectives
 - b. Discuss adherence to guidelines
 - c. Provide any comments and suggestions regarding policy constraints, guidelines, etc.
 3. Review of Investment Process and Evaluation of Portfolio Management Process
 - a. Brief review of investment process
 - b. Discussion of any changes to the investment process
 - c. Investment strategy used over the past quarter and underlying rationale
 - d. Evaluation (in hindsight) of strategy's success/disappointments
 - e. Current investment strategy and underlying rationale
 4. Performance Review
 - a. Present total portfolio and asset class returns for last quarter, year-to-date, last year, three years and five years, and since inception versus designated benchmarks.
 - b. Discuss performance relative to benchmarks. (International equity Managers should provide attribution analysis which identifies returns due to country allocation, stock selection, duration and currency decisions).
 - c. Provide portfolio characteristics relative to benchmark.
 5. Derivatives Review
 - a. A list of all derivative positions as of quarter-end.
 - b. An assessment of how the derivative positions affected the risk exposure of the total portfolio.
 - c. An explanation of any significant pricing discrepancies between the Manager and the PSRSSTL custodian bank.
 - d. A statement certifying compliance with the PSRSSTL Rule XIV and these investment guidelines throughout the quarter; or, if the portfolio has been out of compliance, an explanation.

6. Provide Portfolio Holdings
 - a. Present book value and current market value.
 - b. List individual securities by:
 - (i) Standard and Poor's Corporation sectors for domestic equities
 - (ii) Countries and by industry within country for international equities
 - (iii) Sector for domestic fixed-income
 - (iv) Country, and, for corporate bonds (if any), by industry within country for global fixed-income.
 - c. In the case of mutual funds, a statement showing: (1) the fund holdings broken out, minimally, by equity, fixed-income, cash equivalents and uninvested cash balances and (2) fund positions, by individually-named securities.

C. Annual Reporting

The annual reports submitted to the Trustees, PSRSSTL staff and investment consultant shall contain the following information:

1. Proxy Voting
 - a. The PSRSSTL may, from time to time, or at any time, retain responsibility for the exercise of ownership rights through proxy solicitations, in which case the Managers shall have no responsibility for proxy voting. If the Trustees delegate to the Managers responsibility for the exercise of ownership rights through proxy solicitations, the Managers shall exercise this responsibility strictly for the economic benefit of the Fund and its participants. Annually, Managers shall describe their standing policies with respect to proxy voting, including any changes that have occurred in those policies.
 - b. The proxy votes for all shares of stock in companies held on behalf of the PSRSSTL, specifically noting any instances where proxies were not voted in accordance with standing policy.

2. Commissions & Trading Costs

The annual commission report should be delivered to the Trustees, PSRSSTL staff and consultant within forty five (45) days of the end of each calendar year. The report should cover all trades executed during the prior calendar year. Each annual commission report should include the following:

- a. Broker Selection Policy. Discussion of the firm's policy for selecting brokers, reviewing brokers, and negotiating brokerage commissions. This discussion should identify any situations where the Manager has a financial interest in brokers used to execute trades in the portfolio and a list of all broker-dealers used by the firm.
- b. Commission Expense. Provide a review of the portfolio's actual commission expense over the prior year. At a minimum, this should be broken down by broker and include a distinction between commissions on listed versus unlisted securities, average commission per share, total shares traded, total commission expense, and total trading volume.

- c. Transaction Cost Analysis. If the firm has a system for monitoring total transaction cost, commissions plus market impact, a copy of this analysis should be provided. If no system is being used, the commission report should include a complete explanation of how the firm monitors selected brokers for best execution.
- d. Soft Dollar Policy. This should include a discussion of the firm's soft dollar policy, including the procedures in place to assure that any services purchased by the firm with soft dollars provide economic benefit to the PSRSSTL beneficiaries.
- e. Soft Dollar Expense Review. Identify any goods and services purchased with soft dollars over the past year. This should report, at a minimum, the goods and services purchased, the total cost, and the share of that total cost paid by the PSRSSTL portfolio.

IX. IMPLEMENTATION

All monies invested for the PSRSSTL by its Managers after the adoption of this investment policy shall conform to this policy.

FOR THE PSRSSTL

Approved by:

**PUBLIC SCHOOL RETIREMENT SYSTEM
OF THE CITY OF ST. LOUIS**

Name of Organization

Signature

GAIL A. LAKIN

Printed Name

EXECUTIVE DIRECTOR

Title

Date

FOR THE INVESTMENT MANAGER

Approved by:

Name of Organization

Signature

Printed Name

Title

Date

APPENDIX I - Glossary

This appendix to the Investment and Operating Guidelines for the Public School Retirement System of the City of St. Louis ("PSRSSTL ") is written to provide additional background regarding the selection and interpretation of various standards contained within the guidelines.

- ◆ **Policy Index** - Total return should meet or exceed the PSRSSTL Policy Index . . .

The Policy Index is constructed by using target asset class percentages applied to market rates of return. The Policy Index for the PSRSSTL is calculated using the following target allocations and indices:

Asset Class	Target %	Rating Index
Equities		
Domestic Large Cap	28.0	S&P 500
Domestic Mid Cap	3.0	S&P 400
Domestic Small Cap	10.0	Russell 2000
Established International	10.0	MSCI-EAFE
Emerging International	3.0	MSCI-Emerging Markets
Fixed-Income		
Domestic Core Bonds	14.0	LB Aggregate
Domestic High-Yield	5.0	Citigroup High Yield
Global Bonds	10.0	Citigroup World Government
Market Neutral	4.0	T-Bills + 3%
Hedge Fund Strategies	5.0	Variable Depending on Manager's Style
Real Estate	5.0	Frank Russell NCREIF
Private Markets Investments	3.0	Variable Depending on Manager's Style

- ◆ **Risk-adjusted Returns** should consistently rank . . .

Risk-adjusted returns are usually calculated by isolating the return earned in excess of the risk free rate (the T-bill rate), and evaluating that return in relation to the additional risk (volatility, or standard deviation) incurred in earning the incremental return.

For example:

	<u>Return</u>	<u>Risk</u>	<u>Excess Return</u>	<u>Excess Return Divided By Risk</u>
T-Bills	8%	--	--	
S&P 500	12%	16%	4%	4/16 = 0.25
Manager A	12%	20%	4%	4/20 = 0.20

In this example, both the Equity Manager and the market earned 4% over T-Bills, but the Equity Manager incurred somewhat more risk and had lower risk-adjusted return - not a desirable situation. A higher risk adjusted return indicates that more return was achieved for the amount of risk taken.

◆ **Duration** - The average duration (interest rate sensitivity)...

Duration is a measure of interest rate sensitivity. It provides a ball park estimate of how much the current price of a security (or the current cost of funding a liability stream) will vary for a given change in interest rates. For example, the price of a bond with a duration of seven years will increase roughly 7% if interest rates decline 1%; also, the price of that bond will tend to decline 7% if rates go up 1%.

Duration may be the same as maturity, but usually it is not. For example, a coupon bearing 20 year bond will typically have a duration in the 6-7 year range. However, a 20 year zero coupon bond will have a duration of 20 years.

Accordingly, it is appropriate to conclude that a 20 year zero coupon bond is roughly three times more volatile, or aggressive, than a 20 year coupon bearing bond.

For example, the Lehman Brothers Aggregate Bond Index has a duration of approximately 5.0 years. The seven year guideline, then, would permit active bond Managers to hold a bond portfolio some 40% more volatile than the market (seven years versus five years). Clearly, this latitude would permit a Manager the opportunity to structure a portfolio which would appreciate more than the market in good times, when rates are declining. However, the risk of incurring higher losses than the market also exists if the Manager extends to the maximum allowable term and rates increase.

APPENDIX II - Asset Allocation Policy

The nominal rate of return objective for the Fund is 8.6%. In order to have a reasonable probability of achieving this return, the Trustees have adopted the asset allocation policy outlined below.

<u>Asset Class</u>	<u>Target Allocation</u>	<u>Exposure Range</u>
Equities	54.0%	44 - 64%
Domestic Large Cap	28.0%	18 - 38%
Domestic Mid Cap	3.0%	2 - 5%
Domestic Small Cap	10.0%	8 - 12%
Established International	10.0%	8 - 13%
Emerging International	3.0%	2 - 4%
Fixed Income	29.0%	19 - 39%
Domestic Investment Grade	14.0%	10 - 18%
Domestic High-Yield	5.0%	3 - 7%
Global Bonds	10.0%	8 - 12%
Market Neutral	4.0%	2 - 5%
Hedge Funds	5.0%	3 - 7%
Real Estate	5.0%	3 - 7%
Alternative Investments	3.0%	2 - 5%
Cash	0.0%	0 - 10%

The overall structure of the Fund shall be targeted to the ratios reflected above, but may vary on a tactical (short-term) basis within prescribed limits. Short-term changes in the capital structure will normally occur as a result of asset shifts made by the Tactical Asset Allocation (TAA) manager(s).

APPENDIX III - Performance Benchmarks

This Appendix provides specific guidance regarding individual Manager assignments for classifications, benchmarks and guideline exceptions. Combined with the applicable sections of the Investment and Operating Guidelines and the PSRSSTL Rule XIV, this Appendix provides a complete statement of investment objectives, rules and guidelines for each investment Manager, exclusive of rules or guidelines directly incorporated into contracts or other similar agreements.

Manager/Product Name	Passive Benchmark	Peer Group Assignment and Benchmark	Guideline Exceptions and Clarifications
U.S. EQUITY MANAGERS			
Small Cap Managers	Russell 2000 Index	The ICC* Universe of Small Capitalization Managers	
Mid Cap Managers	S&P 400 Mid Cap Index	The ICC Universe of Mid Capitalization Growth Managers	
Large Cap Growth Managers	Russell 1000 Growth Index	The ICC Universe of Large Capitalization Growth Managers	
Large Cap Value Managers	Russell 1000 Value Index	The ICC Universe of Large Capitalization Value Managers	
Large Cap Core Managers	S&P 500 Index	The ICC Universe of Large Capitalization Core Managers	
U.S. BOND MANAGERS			
High Grade Core Managers	Lehman Brothers Aggregate Bond Index	The ICC Universe of Core Fixed Income Managers	
High Yield Bond Managers	Citigroup High Yield Index	The ICC Universe of High Yield Fixed Income Managers	
NON-U.S. EQUITY MANAGERS			
International Equity Managers	MSCI-EAFE Index, Unhedged	The ICC Universe of International Equity Managers	
GLOBAL BOND MANAGERS			
Global Bond Managers	Citigroup World Government Bond Index, Unhedged	The ICC Universe of Global Bond Managers	
TACTICAL ASSET ALLOCATION MANAGERS			
	50/50 Combination of S&P 500 Index and Lehman Brothers Aggregate Bond Index	The ICC Universe of Balanced Managers	
REAL ESTATE MANAGERS			
Existing Managers	Frank Russell NACREIF	The ICC Universe of Real Estate Managers	
ALTERNATIVE INVESTMENTS			
Existing Managers	NASDAQ + 500 Basis Points	Variable - Depending on the Manager's Style	
MARKET NEUTRAL MANAGERS			
	90-Day T-Bills +3%	The ICC Universe of Short-Intermediate-Term Bond Managers	
HEDGE FUND MANAGERS			
		Variable - Depending on the Manager's Style	

* Independent Consultants Cooperative