Policy Number: 2.20.0

Title: INVESTMENT POLICY OF THE ALPINE SPRINGS COUNTY WATER DISTRICT

1.1 POLICY

WHEREAS; The Legislature of the State of California has declared that the deposit and investment of public funds by local officials and local agencies is an issue of statewide concern; (CGC53600.6 and CGC53630.1) and

WHEREAS; the legislative body of a local agency may invest surplus moneys not required for the immediate necessities of the local agency in accordance with the provisions of California Government Code Section 53601; and

WHEREAS; the treasurer or fiscal officer of the Alpine Springs County Water District shall invest funds in a manner which will provide the highest investment return with the maximum security while meeting the daily cash flow demands of the entity and conforming to all statutes governing the investment of the Alpine Springs County Water District funds.

1.2 SCOPE

This investment policy applies to all financial assets of the Alpine Springs County Water District. These funds (as accounted for in the General Purpose Financial Statements and Independent Auditor's Report) include, but are not limited to: Governmental, General Fund, Capital Projects Fund, and Enterprise Fund.

1.3 PRUDENCE

Investments shall be made with judgment and care, under circumstances then prevailing, which persons of prudence, discretion and intelligence exercise in the management of their own affairs; not for speculation, but for investment, considering the probable safety of their capital as well as the probable incomes to be derived. The standard of prudence to be used by investment officials shall be the "prudent person" standard (CGC53600.3) and shall be applied in the context of managing an overall portfolio.

1.4 OBJECTIVES

When investing, reinvesting, purchasing, acquiring, exchanging, selling and managing public funds, the primary objectives, in priority order, of the investment activities shall be:

1. Safety: Safety of principal is the foremost objective of the investment programs.

Investments of the Alpine Springs County Water District shall be undertaken in a manner that seeks to ensure the preservation of capital in the overall portfolio. To attain this objective, diversification is required in order that potential losses on individual securities do not exceed the

income generated from the remainder of the portfolio.

2. Liquidity: The investment portfolio will remain sufficiently liquid to enable the Alpine

Springs County Water District to meet all operating requirements which

might be reasonably anticipated.

3. Return on Investments: The investments portfolio shall be designed with the

objective of attaining a market rate of return throughout

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budgetary and economic cycles, taking into account the investment risk constraints and the cash flow characteristics of the portfolio. (CGC53600.5)

1.5 DELEGATION OF AUTHORITY

Authority to manage the investment program is derived from California Government Code Section 53601, et seq. Management responsibility for the investment program is hereby delegated to the Treasurer, who shall establish written procedures for the operation of the investment program consistent with this investment policy. Such procedures shall include explicit delegation of authority to persons responsible for investment transactions. No person may engage in an investment transaction except as provided under the terms of the policy and the procedures established by the Treasurer. The Treasurer shall be responsible for all transactions undertaken and shall establish a system of controls to regulate the activities of subordinate officials. The Treasurer is a trustee and a fiduciary subject to the prudent investor standard. (CGC53600.3)

1.6 ETHICS AND CONFLICTS OF INTEREST

Officers and employees involved in the investment process shall refrain from personal business activity that could conflict with the proper execution of the investment program, or which could impair their ability to make impartial investment decisions.

1.7 AUTHORIZED FINANCIAL INSTITUTIONS AND DEALERS

When applicable, the Treasurer will maintain a list of financial institutions, selected on the basis of credit worthiness, financial strength, experience and minimal capitalization, which are authorized to provide investment services. In addition, a list will also be maintained of approved security broker/dealers who are authorized to provide investment and financial advisory services in the State of California. No public deposit shall be made except in a qualified public depository as established by state laws.

For brokers/dealers of government securities and other investments, the Treasurer shall select only brokers/dealers who are licensed and in good standing with the California Department of Securities, the Securities and Exchange Commission, the National Association of Securities Dealers or other applicable self-regulatory organizations.

Before engaging in investment transactions with a broker/dealer, the Treasurer shall have received from said firm a signed Certification Form. This form shall attest that the individual responsible for the Alpine Springs County Water District's account with that firm has reviewed the Alpine Springs County Water District's Investment Policy and that the firm understands the policy and intends to present investment recommendations and transactions to the Alpine Springs County Water District that are appropriate under the terms and conditions of the Investment Policy.

1.8 AUTHORIZED AND SUITABLE INVESTMENTS

The Alpine Springs County Water District may make any investments permitted by California Government Code Section 53601, as hereafter amended.

1.9 COLLATERALIZATION

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All certificates of deposits must be collateralized by U.S. Treasury Obligations. Collateral must be held by a third party and valued on a monthly basis.

1.10 SAFEKEEPING AND CUSTODY

All security transactions entered into by the Alpine Springs County Water District shall be conducted on delivery-versus-payment (DVP) basis. All securities purchased or acquired shall be delivered to the Alpine Springs County Water District by book entry, physical delivery or by third party custodial agreement. (CGC53601).

1.11 DIVERSIFICATION

It is the policy of the Alpine Springs County Water District to diversify its investment portfolio. The Alpine Springs County Water District will diversify its investment by security type and, within each type, by institution. Assets shall be diversified to eliminate the risk of loss resulting from over concentration of assets in a specific maturity, specific issuers or a specific class of securities. Diversification strategies shall be determined and revised periodically. In establishing specific diversification strategies, the following guidelines shall apply:

- (a) Portfolio Maturities shall be matched against projected liabilities to avoid an over concentration in a specific series of Maturities.
- **(b)** Maturities selected shall provide for stability and liquidity.
- (c) Disbursement and payroll dates shall be covered by the scheduled maturity of specific investments, marketable U.S. Treasury Bills or Notes or other cash equivalent instruments, such as money market mutual funds.

1.12 REPORTING

The Treasurer shall submit to each member of the governing body a monthly investment report. The report shall include a complete description of the portfolio, the type of the investments, the issuers, maturity dates, par and dollar amount invested on all securities, investments and moneys held by the District, and shall additionally include a description of any of the District's funds, investments, or programs, that are under the management of contracted parties, including lending programs. With respect to all securities held by the District, and under management of any outside party that is not also a local agency or the State of California Local Agency Investment Fund (LAIF), the report shall also include a current market value as of the date of the report, and shall include the source of this same valuation. The report will also include the source of the portfolio valuation. In the case of funds invested in the LAIF, FDIC Insured accounts or county investment pools, current statements from those institutions will satisfy the above reporting requirement. The report will also include a certification that (1) all investment actions executed since the last report have been made in full compliance with the Investment Policy and, (2) the Alpine Springs County Water District will meet its expenditure obligations for the next six months, per California Government Code 53646 (b). The Treasurer shall maintain a complete and timely record of all investment transactions.

13.0 INVESTMENT POLICY ADOPTION

The Investment Policy shall be adopted by resolution of the Alpine Springs County Water District Board of Directors. Moreover, the Policy shall be reviewed on an annual basis, and modifications must be approved by the Alpine Springs County Water District Board of Directors.

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ALPINE SPRINGS COUNTY WATER DISTRICT PROCEDURES FOR THE INVESTMENT OF DISTRICT SURPLUS FUNDS, ENTERPRISE, GOVERNMENTAL AND OTHER OPERATING FUNDS

As outlined in the Investment Policy of Alpine Springs County Water District, Section 5.0 Delegation of Authority, the procedure for investing surplus funds and operating funds shall be as follows:

As provided for in the Investment Policy, the Treasurer of the District is authorized to initiate investment transactions after approval by the Budget & Finance Committee. The Treasurer may invest with the following approved brokers/dealers and financial institutions:

- California State Local Agency Investment Fund
- Placer County Pooled Treasury
- Bank of the West
- US Bank
- Wells Fargo Advisors

The District's Accountant shall keep bookkeeping and accounting entries of all investment transactions and wire transfers. The Accountant shall keep these records on file and only dispose of them as provided for by the California Government Code.

The Accountant shall be responsible to verify that the amount requested to transfer is the amount shown on the record of transfer. The record of transfer will also be kept in a file and not disposed of until such time as allowed by the California Government Code.

The Accountant shall provide the Board of Directors monthly with a written investment report. The report shall identify the financial institution, the amount invested by the District, the time period, and the interest rate for that month.

Cash Withdrawal from Placer County

When cash is required the General Manager shall initiate a transfer of the cash and direct it to the Bank of the West account.

Claims are received via wire transfer, which in turn is deposited into the Bank of the West checking account.

Responsibility:

It is the responsibility of the General Manager with oversight from the Budget & Finance Committee to ensure compliance with this policy.

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