SUBJECT: Investment Management

Applicable to: AAI Assets
Version: 2.0
Total Pages: 1 of 4

Policy location:

| BOD Approval Date: 08/22/18 | Authorizing Name: Seth Whitten
| Replaces policy signed: 06/25/18 |
| Effective Date: 08/22/18 |

Purpose:
To generate funds to improve long term sustainability goals.
To maximize the returns within the risk parameters acceptable to the Board of Directors.
To maintain practices that accord with legal and regulatory requirements.

Policy:
It is Access Alaska’s policy to use investment funds to create income at the maximum level obtainable while operating within the risk parameters acceptable to the Board of Directors and within the applicable legal and regulatory requirements. The Finance Committee of the Board will be responsible for establishing the acceptable risk parameters, final approval of investment management organization, and protocols for making investment decisions.

Legal and Other References:

Related COA Standards: FIN 4
Procedure:

Verifying and Safeguarding Assets

<table>
<thead>
<tr>
<th>Version: 1.0</th>
<th>Effective Date: 6/25/18</th>
</tr>
</thead>
<tbody>
<tr>
<td>Authorizing Name: Steve Garritson</td>
<td>Signature: [Signature]</td>
</tr>
</tbody>
</table>

1. The Board of Directors will appoint the Finance Committee to oversee the active management of all investment funds. The Finance Committee will have the authority and responsibility to:
   a. Approve the selection of the Investment Management Organization.
   b. Review the composition of the Investment portfolio and make recommendations.
   c. Give an investment financial report to the Board of Directors no less than biannually.
   d. Determine the acceptable risk parameters for the funds.
   e. Set the investment account objective rate of return.
   f. Biannually reviews the investment Management policy of the organization.
   g. Record all investment policy parameter decisions in the finance committee minutes.
      i. The specific investment objective of the Investment Fund shall be to achieve an average rate of return of at least 6% which is representative of a Conservative Growth Portfolio.

2. The following guidelines will be used when engaging the services of an Investment Management Consultant:
   a. The Board recognizes that over the long-term the strategic asset allocation policy will be the key determinant of the returns generated by the Investment Fund and the associated volatility of returns.
   b. The Board intends to segregate the assets of the Investment Fund from all operating bank accounts
   c. The Board requires that the Consultant comply with all the applicable laws, rules and regulations.
   d. The Consultant will be given full discretion in managing the funds within this investment policy statement.
   e. The consultant will review the asset mix at least annually and rebalance the portfolio as needed. This review will be presented to the Finance committee at least annually or on an as needed basis.
Access Alaska, Inc.
Policy and Procedures Manual
Finance

SUBJECT: Investment Management

Applicable to: AAI Assets
Version: 2.0
Total Pages: 3 of 4

Policy location:
BOD Approval Date: 08/22/18
Authorizing Name: Seth Whitten
Signature:
Replaces policy signed: 06/25/18
Effective Date: 08/22/18

f. The plan must be adequately diversified to reduce risk. The interpretation of "adequately diversified" will be left to the investment manager.
g. The Investment Manager is expected to submit to the Executive Director and CFO any request for permission to deviate from this policy.
h. Monthly reports should be submitted showing the following:
   i. Asset mix, at market values, for each major class of security, including cash equivalents
   ii. Position, by individually named securities and/or by appropriately described units of collective funds, showing market values of individually invested securities, and the unrealized gain or losses on each position.
   iii. Transactions affected in the account, categorized by purchases, sales and accrued income, including realized gains or losses on each position.
   iv. Performances of the portfolio, compared to the relevant benchmark defined by the Board.
i. Review Meetings at a minimum annually that will include:
   i. Presentation of investment results in light of the stated objectives.

3. The following investment guidelines are to be followed in the management of the Equity portion of the Investment Fund:
   a. Allocation to prescribed asset classes will generally be achieved by purchasing either open-end mutual funds or exchange traded funds rather than individual stocks.
   b. Investment results (performance) should be in the top quartile relative to benchmarks, peer groups, and similar style for 1, 3, 5, and 10 year periods, if available.
   c. Relative performance will be more important that absolute performance of investments.

4. The following investment guidelines are to be followed in the management of the Fixed Income portion of the Investment Fund:
   a. The Board believes it should be the function of the Investment Management consultant to allocate the assets of the investment account among government bonds, corporate bonds, certificates of deposit and cash reserves. Accordingly, it is the philosophy of the Board of that the account be fully invested. The Investment manager will be given some flexibility in terms of the timing of purchase and sales, but the Board does not desire to hold significant cash reserves.
   b. Bonds purchased for the account should be U.S. governments or agencies thereof
or investment grade corporate rated AA3-or better by Moody’s or AA3 or better by Standard & Poor’s.

c. Certificates of Deposits purchased for the accounts should be insured by the FDIC and the combined total of principal and expected interest to be earned should be less than the FDIC limit, (currently $250,000.)

d. Cash reserves should be invested in interest bearing money market securities, with a stable net asset value, and instantly saleable.

e. All assets must have readily ascertainable market value and be easily marketable.

5. The following are prohibited transactions or assets in the investment Fund:

a. Commodity trading – including all futures contracts
b. Short selling
c. Optional trading
d. The use of Margin
e. Real Estate
f. Precious metals
g. Venture capital
h. Letter stock
i. Private placements
j. Direct Payments

Attachments: None