

Natural Heritage Trust

2022-23 Investment Report & Policies

June 28, 2023

Report Background

The NHT is required by Public Authorities Law Section 2925 to prepare and submit an annual investment report to the NY Authorities Budget Office and Office of the State Comptroller. The report is submitted electronically in the Public Authorities Reporting Information System (PARIS) and posted to the NHT's website.

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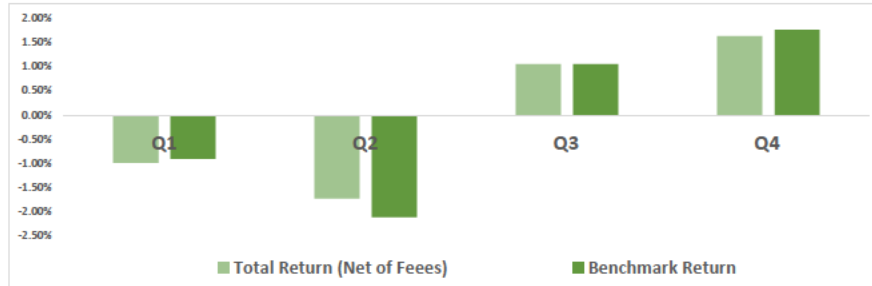
NHT Cash (Banking) Account Activity Year-to-Date 4/1/22 - 3/31/23

Account	Beginning Balance 4/1/22	Revenues	Expenditures	Interest Income	Bank Fees	Transfers (Net)	Ending Balance 3/31/23
Key Bank (Main Operating/Payroll)	\$4,949,410	\$13,616,153	\$16,815,664	\$3,392	\$9,324	-\$615,000	\$1,128,967
M&T Bank (Merchant- CC)	\$198,664	\$346,744	\$566,748	\$0	\$16,641	\$200,000	\$162,019
Capital One	\$115,110	\$2,542,947	\$0	\$0	\$65	-\$2,585,000	\$72,992
Totals	\$5,263,184	\$16,505,844	\$17,382,412	\$3,392	\$26,030	-\$3,000,000	\$1,363,977

Investment Strategy: Short-term/ Operating
NHT Investment Account Activity 4/1/22 - 3/31/23

Investment Account	Market Value 4/1/22	Additions	Distributions	Interest & Dividend Income	Realized Gains/(Losses)	Unrealized Gains/(Losses)	Investment Management & Custody Fees	Market Value 3/31/2023
Main Project/Program Account Total:	\$ 22,427,727	\$ 3,899,483	\$ 1,550,000	\$ 527,621	\$ 3,778	\$ (459,423)	\$ 37,886	\$ 24,811,300

Quarterly Performance 4/1/22 - 3/31/23



	4/1/22 - 6/30/22	7/1/22 - 9/30/22	10/1/22 - 12/31/22	1/1/23 - 3/31/23
Total Return (Net of Fees)	-0.99%	-1.73%	1.06%	1.64%
Benchmark Return	-0.91%	-2.12%	1.06%	1.77%

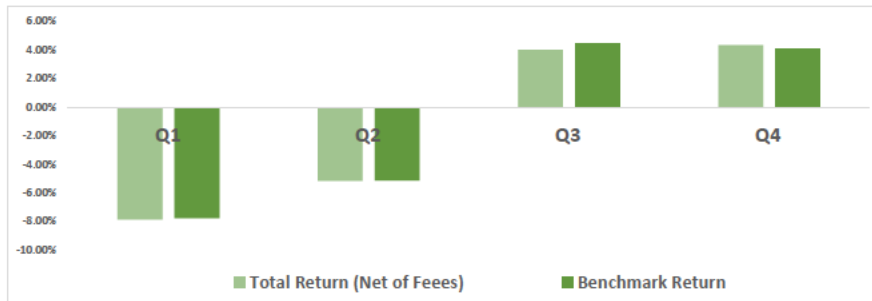
1 Year Total Return:	-0.08%
Benchmark Return:	-0.25%

Benchmark:
Short-Term/Operating ICE BofA ML 1-5 yr AAA-A Government/Corporate

Investment Strategy: Capital/Reserve
NHT Investment Account Activity 4/1/22 - 3/31/23

Investment Account	Market Value 4/1/22	Additions	Distributions	Interest & Dividend Income	Realized Gains/(Losses)	Unrealized Gains/(Losses)	Investment Management & Custody Fees	Market Value 3/31/2023
Bayard Cutting	\$ 619,859	\$ -	\$ -	\$ 12,296	\$ (2,523)	\$ (40,841)	\$ 928	\$ 587,864
Main Reserve	\$ 1,084,238	\$ -	\$ -	\$ 21,508	\$ (4,411)	\$ (71,493)	\$ 1,623	\$ 1,028,219
Capital Accounts Total:	\$ 1,704,097	\$ -	\$ -	\$ 33,804	\$ (6,934)	\$ (112,334)	\$ 2,551	\$ 1,616,082

Quarterly Performance 4/1/22 - 3/31/23



	4/1/22 - 6/30/22	7/1/22 - 9/30/22	10/1/22 - 12/31/22	1/1/23 - 3/31/23
Total Return (Net of Fees)	-7.86%	-5.14%	4.02%	4.33%
Benchmark Return	-7.77%	-5.11%	4.48%	4.11%

1 Year Total Return:	-5.15%
Benchmark Return:	-4.81%

Environmental, Social, Governance Capital/Reserve Benchmark:

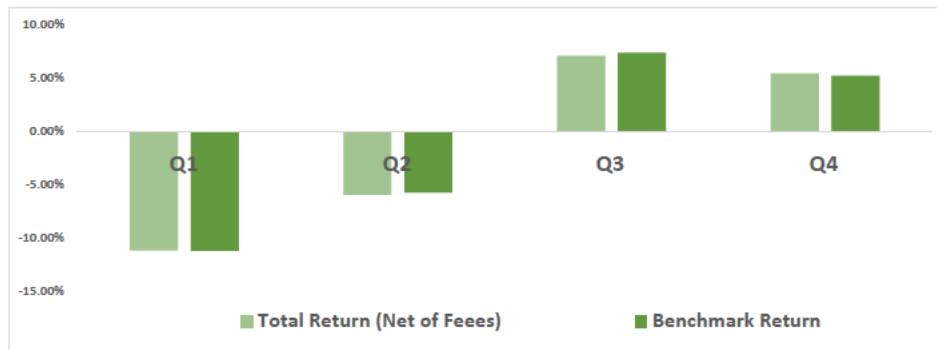
18.3% MSCI USA ESG Select NR USD; 1.4% MSCI USA SmI Cap Extd ESG Focus NR USD; 7.3% MSCI EAFE EXTENDED ESG FOCUS NR USD;
1.0% MSCI EM EXTENDED ESG FOCUS NR USD; 70% BBgBarc MSCI US Agg ESG Focus TR USD; 2% 1 month T-bill

Investment Strategy: Endowment/Long-Term Investment

NHT Investment Account Activity 4/1/22 - 3/31/23

Investment Account	Market Value 4/1/22	Additions	Distributions	Interest & Dividend Income	Realized Gains/(Losses)	Unrealized Gains/(Losses)	Investment Management & Custody Fees	Market Value 3/31/2023
Main LTI	\$ 2,551,261	\$ -	\$ -	\$ 47,005	\$ (7,348)	\$ (183,754)	\$ 3,756	\$ 2,403,409
Huttleston	126,031	-	-	2,322	(357)	(9,077)	186	118,733
E.T. Thacher	651,334	-	15,000	11,853	(2,885)	(47,096)	950	597,256
Mt. Loretto	4,235,757	-	71,000	77,344	(16,659)	(306,262)	6,193	3,912,987
Hallock State Park	2,436,579	-	-	44,892	(7,009)	(175,496)	3,587	2,295,379
Four Freedoms	2,605,052	-	63,000	47,378	(11,833)	(188,354)	3,797	2,385,445
Minnewaska	2,676,016	-	123,000	48,094	(17,405)	(192,989)	3,866	2,386,850
Sampson State Park	1,026,294	-	20,000	18,712	(4,277)	(74,203)	1,499	945,027
Rockefeller Preserve	12,184,458	-	548,000	219,102	(77,998)	(878,983)	17,610	10,880,970
Hempstead Lake	976,674	-	-	17,995	(2,814)	(70,339)	1,438	920,078
Humphrey NC	1,817,488	-	-	33,487	(5,242)	(130,900)	2,676	1,712,157
Harriman Stewardship	2,221,669	-	-	40,927	(6,387)	(160,030)	3,271	2,092,908
Harriman Env. Education	608,735	-	35,000	10,874	(4,913)	(43,520)	875	535,301
Shido Endowment for Thacher	396,043	-	8,000	7,218	(1,868)	(28,424)	578	364,391
Autism Nature Trail Mgmt (ANT)	1,227,497	250,000	-	22,577	(2,359)	(84,590)	1,796	1,411,329
Pat McGee Trail Mgmt	176,028	-	-	3,243	(584)	(12,614)	259	165,814
Big Woods Endowment	\$ 470,125	\$ -	\$ -	\$ 8,651	\$ (1,378)	\$ (33,813)	\$ 692	\$ 442,892
Endowment Accounts Total:	\$ 36,387,041	\$ 250,000	\$ 883,000	\$ 661,674	\$ (171,315)	\$ (2,620,444)	\$ 53,028	\$ 33,570,927

Quarterly Performance 4/1/22 - 3/31/23



	4/1/22 - 6/30/22	7/1/22 - 9/30/22	10/1/22 - 12/31/22	1/1/23 - 3/31/23
	Q1	Q2	Q3	Q4
Total Return (Net of Fees)	-11.19%	-5.95%	7.04%	5.40%
Benchmark Return	-11.21%	-5.74%	7.36%	5.20%

1 Year Total Return:	-5.79%
Benchmark Return:	-5.46%

Environmental, Social, Governance Long-term/Endowment Benchmark:

32% MSCI USA ESG Select NR USD; 8% MSCI USA Sml Cap Extnr ESG Focus NR USD; 14.8% MSCI EAFE EXTENDED ESG FOCUS NR USD; 5.2% MSCI EM EXTENDED ESG FOCUS NR USD; 38% BbgBarc MSCI US Agg ESG Focus TR USD; 2% 1 Month T-bill

Main Management Project/Program Holdings Categorized by SECTOR as of 3/31/23

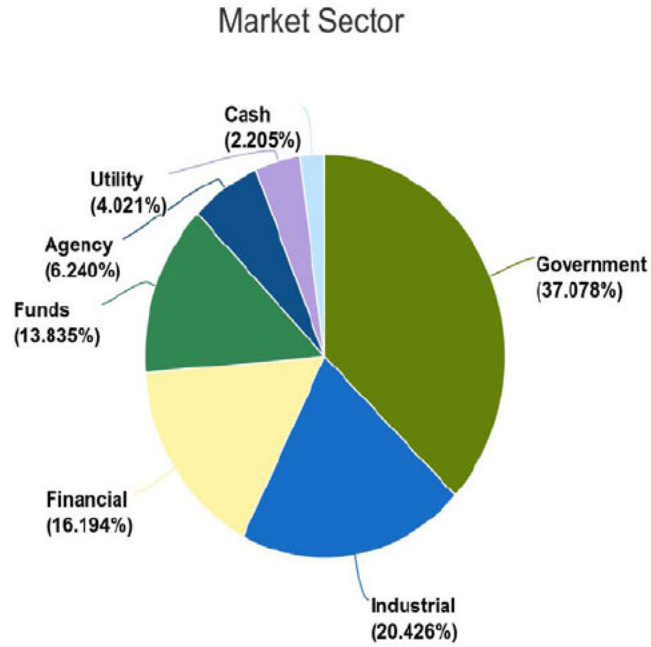
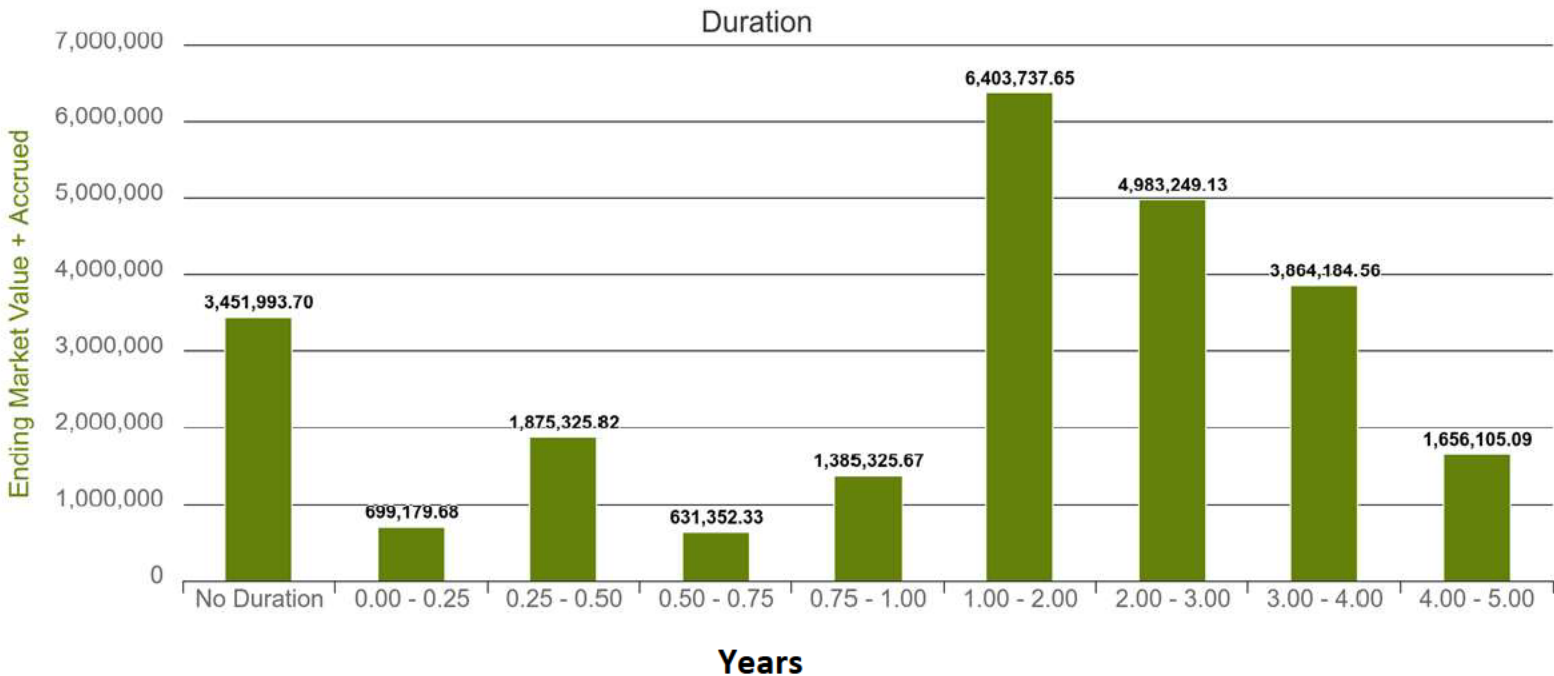


Chart calculated by: Ending Market Value + Accrued

Main Management Holdings Categorized by DURATION as of 3/31/23

**Individual bond holdings with maturities ranging from 0 - 5 years
with coupon rates (interest from 0.25% to 4.25%)**



NATURAL HERITAGE TRUST
BANKING & INVESTMENT POLICY
(Adopted June 29, 2020)

THE BANKING & INVESTMENT POLICY OF THE NATURAL HERITAGE TRUST REGARDING INVESTMENT OF ALL FUNDS, PROVIDING FOR THE SECURITY OF THOSE INVESTMENTS AND PROVIDING FOR PERIODIC REPORTS ON THE INVESTMENTS, last revised June 29, 2020.

ARTICLE I

STATEMENT OF PURPOSE AND INVESTMENT OBJECTIVE

101. This Policy is adopted pursuant to the provisions of Section 2925 of the Public Authorities Law and shall be reviewed and approved by the Board at least annually.
102. The investment objective of the Trust is to obtain maximum return on available funds while maintaining a prudent cash position and protecting against loss of principal.
103. The goals, objectives and guidelines applicable to specific investment accounts shall be set forth in Investment Policy Statements (IPS) established by the Trust upon the advice of its Investment Advisor.

ARTICLE II

DEFINITION OF TERMS

201. Definitions. The following terms shall, for all purposes of this Policy, have the following meanings unless the context shall clearly indicate some other meaning:
- “Board” shall mean the Board of Directors of the Natural Heritage Trust.
- “Trust” shall mean the Natural Heritage Trust.
- “Chief Financial Officer” or “CFO” shall mean that officer as such term is defined in the By-Laws of the Trust or her/his designee.
- “Counsel” shall mean that officer as such term is defined in the By-Laws of the Trust.
- “Custodial Account” shall mean the bank and investment account(s) of the Natural Heritage Trust.
- “Custodian” shall mean the Executive Director of the Natural Heritage Trust.
- “Deliver” or “Delivered” shall mean either (1) the voluntary transfer of possession to the Custodian or a custodial bank designated by the Custodian, or (2) the registration of transfer by the appropriate book entry procedure by a member of the Federal Reserve System.

“Depository Bank” shall mean a bank designated by the Executive Director to hold deposits of the Trust’s funds. The obligation on the part of the Depository Bank is that it keeps the deposit and, upon request, restores it to the depositor or otherwise delivers it according to the original trust.

“Investment Advisor” shall be the person or entity to provide advice to the Trust and to invest the funds of the Trust at the direction of the Investment Officers.

“Investment Obligations” shall mean U.S. Treasury Obligations, Federal Government Agency Obligations, Certificates of Deposit, Corporate Debt Obligations and Other Obligations Authorized under SFL 98, as set forth in Section 302 of this Policy.

“Investment Officer” shall mean the Trust’s Executive Director or her/his designee.

“Investment Policy Statement” or “IPS” shall mean the document setting forth the goals and objectives, and the management guidelines applicable to the Trust’s investment portfolios. Each IPS shall create the framework for an appropriately diversified asset mix that can be expected to generate acceptable returns at a level of risk suitable to the Trust. Each IPS shall be approved by the Board after consultation with the Investment Advisor prior to signature by the Investment Officer.

“Officer” shall mean any person holding an office of the Trust as defined in the Trust’s By-Laws.

ARTICLE III

INVESTMENT AUTHORIZATION, PERMITTED INVESTMENTS AND SECURITY THEREFOR

301. Investment Authorization.

- (1) The Investment Advisor shall invest the funds of the Trust in accordance with the terms of this Investment Policy at the direction of the Investment Officer.
- (2) The Investment Officer shall, after arriving at an investment decision in accordance with the Trust’s investment policy, authorize the Investment Advisor to invest the funds of the Trust.
- (3) The Investment Advisor shall have full discretion to invest the funds of the Trust in accordance with the associated IPS and shall within three business days provide a letter to the Trust Investment Officer and CFO detailing the trade and reason for the trading activity.

302. Permitted Investments and Required Security Provisions.

- (1) All Funds of the Trust must be initially deposited in Negotiated Order of Withdrawal (NOW), comparable demand or money market accounts secured as described below. All proceeds of maturing investments must be immediately redeposited in NOW, comparable demand or money market accounts unless reinvested in accordance with the instructions of the Trust’s Investment Officer.
- (2) Investment of funds of the Trust or any other monies under its custody and control not required for immediate use or disbursement, at the discretion of the Board, may be made in accordance with the applicable Investment Policy Statement applicable to each investment account. The Trust may establish an IPS for individual investment account types (e.g. operating, capital

projects, reserve, long-term, endowment). Each IPS shall be appended to and incorporated in this Policy.

- (3) Notwithstanding any other provision herein, permitted investments may only be placed through firms approved by the Investment Officer or CFO.
- (4) The maturity of any authorized investment obligation shall not exceed the term provided for in the IPS applicable to such investment.
- (5) In the event that a change in market conditions alter the rating of any investment obligation held by the Trust such that that the investment obligation would no longer be permissible under these guidelines or applicable IPS, the Investment Advisor shall notify the Investment Officer or CFO as quickly as is reasonably practicable. Disposal of such investment obligation is detailed in the applicable IPS.

303. Collateral

- (1) All secured deposits and investments must be fully secured by the Federal Deposit Insurance Corporation (FDIC) or equivalent or fully collateralized at all times except as provided in Section 303(3).
- (2) Demand deposits, time deposits, and certificates of deposit issued by a commercial bank having a long term rating of “Aa3” or higher by Moody’s or “AA-“ or higher by S&P Global Ratings do not require collateralization unless otherwise required by the Trust Investment Officer or CFO. All other demand deposits, time deposits, and certificates of deposit shall be collateralized for amounts over and above Federal Deposit Insurance corporation coverage. All collateral shall be authorized Investment Obligations, exclusive of Corporate Debt Obligations. Collateral shall be delivered to the Investment Advisor or its custodial bank. The market value of collateral shall at all time equal or exceed the principal amount of the funds deposited. Collateral shall be monitored and valued to market by the Investment Advisor in accordance with its policies.
- (3) Collateral shall not be required with respect to the direct purchase of obligations of New York State, obligations the principal and interest of which are directly guaranteed by New York State, obligations of the United States, and obligations of federal agencies the principal and interest of which are guaranteed by the United States Government.

304. All investments shall be reviewed by the Trust Investment Officer and CFO on a monthly basis and reported to the Board of the Trust at least quarterly.

ARTICLE IV

RESPONSIBILITIES OF INVESTMENT ADVISOR

401. Responsibilities of Investment Advisor.

- (1) The Investment Advisor shall invest Custodial Account funds in accordance with law and this investment policy at the direction of the Investment Officer or CFO.
- (2) The Investment Advisor shall invest Custodial Account funds into highest yielding instruments permissible while maintaining security and liquidity consistent with this policy and/or applicable IPS.

- (3) The Investment Advisor shall be available for consultation with the Trust Investment Officer, CFO, the Board, and/or their designee(s) as necessary and as often as reasonably requested.

ARTICLE V

OTHER REQUIREMENTS OF INVESTMENTS

501. Written Contracts. In accordance with Section 2925, Subdivision 3(c) of the Public Authorities Law, all investments of the Trust's funds must be made pursuant to a written contract between the Trust and its Investment Advisor.
502. Security Provisions. Each investment shall provide for sufficient security of the Trust's financial interest as stated in Sections 301 and 302 of this Policy. The Investment Advisor shall maintain a description of the use, type and amount of collateral or insurance for each investment, the method for valuation of that collateral and of control, deposit and retention of investments and any required collateral, including, where appropriate, physical delivery or other action necessary to obtain title or a perfected security interest.

ARTICLE VI

REPORTS

601. Quarterly Reports. The Trust shall prepare and deliver to the Board Quarterly reports on the Trust's Investments. Such reports shall include a description of new investments, the inventory of existing investments and the selection of investment bankers, brokers, agents, dealers or auditors. The report of investments included in the financial report submitted by the CFO at either Board Meetings or via e-mail will be deemed to meet this requirement.
602. Annual Report. Within ninety (90) days after the close of each fiscal year, the Board shall approve an annual investment report. Such report shall include the Policy and any supplemental resolutions, the results of an annual independent audit of the investments, the annual investment income record of the Trust and a list of the total fees, commissions or other compensations by payee for all investment advisors, and an annual consolidation of other material contained in the annual report. This annual investment report, after being approved by the Board, shall be submitted to the Governor's Office, Division of the Budget, Office of the State Comptroller, the Senate Finance Committee and the Assembly Ways and Means Committee. Copies of the annual investment report shall also be posted to the Trust's website.

ARTICLE VII

MISCELLANEOUS PROVISIONS

701. Powers of Amendment. Any modification or amendment of this Policy may be made by a supplemental resolution adopted at any duly constituted meeting of the Board; provided, however, that no such modification or amendment to this Policy shall abrogate the rights and duties of then existing Trust contracts with third parties
702. No Recourse Under this Policy

- (1) No provision in this Policy shall be the basis of any claim against any Board member, officer or employee of the Trust in their individual or official capacity or against the Trust itself.
- (2) The Board, officers, or employees of the Trust Shall be deemed to be acting within the Public Officers Law in the discharge of their duties pursuant to this Policy.

703.Effect of Failure to Comply.

Failure to comply with this Policy shall not invalidate any investment or affect the validity of the authorization of the Board or their designees to make such investments.

INVESTMENT POLICY STATEMENT for
NATURAL HERITAGE TRUST - Operating Account
MANAGED by WILMINGTON TRUST INVESTMENT ADVISORS, INC.

The purpose of this Investment Policy Statement (IPS) is to establish a clear understanding between **Wilmington Trust Investment Advisors, Inc.** (“Advisor”) and **Natural Heritage Trust** (“Client”) regarding the investment goals and objectives, and the management guidelines applicable to the Client’s investment portfolio (“Portfolio”). This Investment Policy Statement will:

- Establish reasonable expectations, goals, objectives and guidelines in the investment of the Portfolio’s assets.
- Create the framework for an appropriately diversified asset mix that can be expected to generate acceptable returns at a level of risk suitable to the Client, including:
 - specifying the investment strategy and target asset allocation policy
 - establishing investment guidelines regarding the permissible securities and diversification of assets
 - specifying the criteria for evaluating the performance of the Portfolio’s assets
- Encourage effective communication between the Advisor and Client

This IPS is intended to reflect the Client’s investment philosophy and guidelines governing the investment of the Portfolio under normal market conditions. This IPS should reflect the Client’s current status and philosophy, and should be reviewed and revised periodically to ensure it adequately reflects significant changes related to the Client’s circumstances, investment goals and objectives, or the capital markets. It is understood that there can be no guarantee about the attainment of the goals or investment objectives outlined herein.

A. Investment Strategy: Intermediate Fixed Income

Customized investment strategy of actively managed intermediate fixed income securities to preserve principal, maximize the total return, and achieve a desired level of liquidity.

Consistent with NHT’s mission, consider environmental, social and governance (ESG) factors alongside traditional financial analysis.

B. Investment Objectives:

1. Safety of Principal
2. Total Return
3. Liquidity

C. Sustainable Investing

Sustainable investments seek to encourage sustainable business practices and ethical behavior of companies. An ESG investment approach evaluates risk and potential reward alongside traditional financial analysis to achieve financial objectives. Examples of ESG factors are:

1. Environmental – Emissions intensity, renewable usage and water efficiency
2. Social – Workforce diversity, health and safety policy, policy against child labor
3. Governance – Accounting practices, independent and diverse board of directors, share class voting rights

D. Client Profile:

Organization:

Not-For-Profit/Public

Business: Trust

Fiscal Year End: March 31st

Account Type: Investment Management Account

Retirement: ERISA: _____ Non-ERISA: _____ Non-Retirement: Other: _____

Amortize/Accrete Premium/Discount securities: Yes _____ No

Purpose of Portfolio Funds: Operating Account

E. Investment Constraints:

1. Trading Constraints: Full Investment Manager discretion: Yes* Other: *Trade letter is provided by Advisor within 3 business days of any purchase or sale. Client may disapprove of the transaction within 5 business days. Gains and losses from transactions completed in compliance with the IPS will be for the account.

F Asset Allocation:	Minimum	Maximum	Target
Fixed Income	50%	100%	95%
Cash/Money Market	0%*	50%	5%

* It is the responsibility of the Client to maintain an average daily balance of at least 5% of operating assets in cash equivalents, however, such assets may be maintained in deposit accounts outside the purview of the Advisor (e.g. checking accounts with other financial institutions).

G. Eligible Separately Managed Investments: Portfolio concentrations shall use *Market Values at Time of Purchase* and use the *Lower of the allowable credit ratings*. Note: Fixed Income mutual funds and ETF's are also eligible that are consistent with the parameters below.

	ITEM	Portfolio % Limit
1.	Treasury Securities: U.S. Treasury obligations, including Bills, Notes and Bonds. Both Nominal and TIPS.	100%
2.	Government Agencies: U.S. Government-guaranteed and Government sponsored corporations and agencies, including mortgage-backed securities (MBS) and collateralized mortgage obligations (CMO) *no more than 20% in any specific GSE.	35%*
3.	Corporate Bonds: U.S. dollar-denominated debt obligations of corporations including, but not limited to, floating rate notes, medium-term notes, bonds, debentures, and repurchase agreements. At the time of purchase, corporate bonds must have a minimum long-term credit rating by at least one of the NRSROs (i.e. S&P, Moody's) of "A". Total corporate bonds maximum of 60%. A-/A3 Baa2/BBB	60% 5%

4.	Commercial Paper: Corporate debt obligations whose maximum maturity by definition is less than 270 days. At time of purchase, commercial paper must have a minimum credit rating of A1/P1.	25%
5.	Asset-Backed Securities (“ABS”): ABS collateralized by, but not limited to, credit card, auto, home equity and student loans; both fixed and floating rate. At the time of purchase must have a minimum credit rating by <u>at least one</u> of the NRSROs (S&P, Moody’s) of: Long Term: AAA or Aaa or Short Term: A1 or P1 Long Term: AA- or Aa3	40% 25%
7.	Taxable Municipal Bonds: Obligations of the U.S. states, local governments, and other municipal entities, that are taxable, including General Obligation and Revenue bonds, commercial paper, and Variable Rate Demand Notes (VRDNs). At the time of purchase must have a minimum credit rating by <u>at least one</u> of the NRSROs (i.e. S&P, Moody’s) of “A”.	25%
8.	Money Market Funds: Money Market Fund (may include Corporate Securities) at the time of purchase must have a credit rating by the NRSROs (i.e. S&P, Moody’s) of “AAAm”.	100%

H. Maturity Restrictions: Maturity restrictions shall be at *Time of Purchase*.

1. Individual Security Maturity:

For any single issue the maximum final maturity will not exceed **5 years**, with the exception of single issue treasuries which may have a final maturity of 7 years.

I. Investment/Credit Restrictions: Investment/Credit Restrictions shall be at *Time of Purchase*

1. Bond Ratings:

Bonds must be rated at least “A” at time of purchase by S&P or Moody’s. If individually managed fixed income securities fall below the credit quality restrictions applied at time of purchase, the Investment Manager will notify the client in a reasonable period of time following the rating downgrade. This will extend to any obligation that has been downgraded 2 levels from the minimum required long-term credit rating at time of purchase. If the obligation is downgraded more than 2 levels from the minimum the Investment Officer has 120 days to dispose of that obligation.

2. Client Notification and Approval:

If securities fall below the credit quality restrictions applied at time of purchase, the Investment Manager will notify the client (email or writing) in a reasonable period of time following the rating downgrade.

3. Single Issuer:

- Single Corporate issuer concentration of a portfolio’s aggregate market value shall not exceed 5% at time of purchase.
- Single Corporate issuer includes the issuer parent, subsidiaries, and affiliates included in the consolidated financial statements of the ultimate parent company.

J. Performance Benchmark:

- Investment performance will be analyzed on a quarterly basis.
- The performance benchmark will be:
 - Fixed Income: **ICE BofAML 1-5 Yr AAA-A, Government/Corporate**
 - Cash/Money Market: **Citigroup 1 Month Treasury Bill**

K. Client Communications:

The Advisor shall keep the Client apprised of any material changes in Advisor's outlook, recommended investment policy and strategy. In addition, Advisor shall issue reports and meet with the Client as specified below.

1. Reports:

The Advisor will provide to the Client in writing a quarterly economic analysis and performance report concerning each account unless otherwise specified.

2. Meetings:

The Advisor will offer to meet in person annually with the Client at a mutually agreeable time and place unless otherwise specified, to review and explain the Portfolio's investment results and related information. Additional communications may be made by telephone and email.

By signing below, the Client acknowledges that the Client understands these guidelines and agrees that they will remain in effect until Wilmington Trust Investment Advisors, Inc. receives written notice from Client to the contrary. Client agrees that the IPS of this Portfolio shall be governed by the Investment Management Agreement by and between Wilmington Trust Investment Advisors, Inc. and Client ("Agreement"). In the event of a conflict or discrepancy between this IPS and the Agreement, the Agreement shall be controlling.

Accepted:

For: NATURAL HERITAGE TRUST – Operating Accounts

By: Sarah Purcell
Name

Sarah Purcell
Signature

Deputy Director & Chief Financial Officer
Title

2/24/21
Date

For: WILMINGTON TRUST INVESTMENT ADVISORS, INC.

By: Stephen Seivold
Name

Stephen Seivold
Signature

VP, Institutional Investment Advisor
Title

2/24/2021
Date

SCHEDULE A
ACCOUNT LISTING

OPERATING ACCOUNT

- Main Management - [REDACTED]

Approval for: NATURTAL HERITAGE TRUST – Operating Account

By: Sarah Purcell
Name

Deputy Director & Chief Financial Officer
Title

Sarah Purcell
Signature

2/24/21
Date

INVESTMENT POLICY STATEMENT for
NATURAL HERITAGE TRUST – Capital Projects/Reserve Accounts
MANAGED by WILMINGTON TRUST INVESTMENT ADVISORS, INC.

PURPOSE

The purpose of this Investment Policy Statement (IPS) is to establish a clear understanding between **Wilmington Trust Investment Advisors, Inc.** (“Advisor”) and **Natural Heritage Trust** (“Client”) regarding the investment goals and objectives, and the management guidelines applicable to the Client’s investment portfolio (“Portfolio”). This Investment Policy Statement will:

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 - specifying the criteria for evaluating the performance of the Portfolio’s assets
- Encourage effective communication between the Advisor and Client

This IPS is intended to reflect the Client’s investment philosophy and guidelines governing the investment of the Portfolio under normal market conditions. This IPS should reflect the Client’s current status and philosophy should be reviewed and revised periodically to ensure it adequately reflects significant changes related to the Client’s circumstances, investment goals and objectives, or the capital markets. It is understood that there can be no guarantee about the attainment of the goals or investment objectives outlined herein.

A. Investment Objective

NHT’s mission is to receive and administer gifts, grants and contributions to further public programs for parks, recreation, cultural, land and water conservation and historic preservation purposes of the State of New York.

- Consistent with NHT’s mission, the portfolio will utilize sustainable strategies that incorporate Environmental, Social and Governance criteria in their security selection
- The Portfolio will use a Total Return approach intended to generate returns from both capital appreciation and income over the specified time horizon.
- Risk, measured in terms of portfolio volatility, is anticipated to be similar to that of the broader financial markets.
- Portfolio performance should exceed the benchmark performance over a 5-year moving time period (average market cycle).

The Client-defined level of preferred risk and return for the Portfolio is characterized by selection of one of the following MTBIA investment objectives and/or as modified by *(E.) Portfolio Profile* or *(G.) Asset Allocation Guidelines*:

Conservative: X Income & Growth: Growth & Income: Growth: Aggressive Growth:

B. Sustainable Investing

Sustainable investments seek to encourage sustainable business practices and ethical behavior of companies. Sustainable investing is based on a set of standards that consider environmental, social and governance (ESG) factors to evaluate risk and potential reward beyond traditional financial analysis to achieve financial objectives.

Examples of ESG factors are:

1. Environmental – Emissions intensity, renewable usage and water efficiency
2. Social – Workforce diversity, health and safety policy, policy against child labor
3. Governance – Accounting practices, independent and diverse board of directors, share class voting rights

Equity and fixed income investments will be made in sustainable strategies unless a suitable strategy is not available.

C. Asset Allocation Strategy: Traditional Asset Classes

This strategy utilizes an extensive range of traditional asset classes. “Traditional asset classes” include domestic & international: stocks, bonds and cash securities. A wide variety of structures may be used to represent this range of asset classes such as: Closed/Open-end Mutual Funds, Exchange Traded Funds, Separately Managed Accounts or Strategies. Where Funds are used, they shall have a fundamental investment policy that is in general accordance with the intent of this statement.

D. Prohibited Investments

Currently excluded from “Traditional Asset Classes” are illiquid asset classes and vehicles that do not have daily liquidity. This includes, but is not limited to, most hedge funds, private equity, physical real estate, and physical commodities. Also excluded are individual investment in private placements, letter stock, short sales and margin transactions. Collars, forwards, futures, options and other hedging strategies will not be utilized without Client’s prior approval.

E. Client Profile

Organization [Corporate, Individual, Limited Partnership, Public, Not For Profit, Union]: Not-For-Profit/Public
Industry/ Line of Business [NAICS sectors]: _____
Fiscal Year End: March 31st

F. Portfolio Profile

Purpose of Portfolio Funds: Trust
Time Horizon [short (< 3 years), medium (3-5 years), long-term (> 5 years)]: Medium/Long-term
Liquidity Needs/Income Needs (payment/time period): As Requested
Tax Consequences (taxable, tax-exempt): Tax-exempt
Amortize/Accrete Premium/Discount securities: Yes ___ No X

Retirement [Deferred Comp, Defined Benefit, Defined Contribution/Profit Sharing, Health & Welfare/VEBA, IRA, Not Retirement, Other]: _____ ERISA: Yes ___ No X
Required Actuarial or Spending Policy Rate: _____

Trading Constraints:

Full Investment Manager discretion: Yes *X No _____

Other: *Trade letter is provided by Advisor within 3 business days of any purchase or sale. Client may disapprove of the transaction within 5 business days. Gains and losses from transactions completed in compliance with the IPS will be for the account.

G. Advisor Separately Managed Fixed Income Parameters

1. Investment/Credit Restrictions shall be at time of purchase and use the lower of the allowable credit ratings:

- Single issuer concentration shall be limited to 5% of the portfolio, other than for U.S. Treasuries, Government Agencies and MBS, **limited to 20% per GSE.**
- For Municipal Securities, the single security issue shall be limited to 5% of the portfolio.

2. Maturity Restrictions shall be at time of purchase:

- The Maximum Final Maturity for any single issue will not exceed 10 years.
- The Portfolio Average Effective Duration will not exceed 7 years and will be within +/- 20% of the specified performance benchmark.

3. Bond Ratings:

Bonds must be rated at least “BBB/Baa” at time of purchase by S&P or Moody’s. If individually managed fixed income securities fall below the credit quality restrictions applied at time of purchase, the Investment Manager will notify the client in a reasonable period of time following the rating downgrade. This will extend to any obligation that has been downgraded 1 level from the minimum required long-term credit rating. If the obligation is downgraded more than 1 level from the minimum the Investment Officer has 120 days to dispose of that obligation.

4. Prohibited Investments not included in Section C. shall be:

- Non U.S. dollar-denominated securities

5. Eligible Fixed Income Investments include: Portfolio concentrations shall use *Market Values at Time of Purchase* and use the *Lower of the allowable credit ratings*. **Note:** Fixed Income mutual funds and ETF’s are also eligible that are consistent with the parameters below.

	<i>ITEM</i>	Portfolio % Limit
1.	<u>Treasury Securities:</u> U.S. Treasury obligations, including Bills, Notes and Bonds. Both Nominal and TIPS.	100%
2.	<u>Government Sponsored Agencies:</u> U.S. Government-guaranteed and Government sponsored corporations and agencies, including mortgage-backed securities (MBS) and collateralized mortgage obligations (CMO) *no more than 20% in any specific GSE.	35%*
3.	<u>Asset-Backed Securities (“ABS”):</u> ABS collateralized by, but not limited to, credit card, auto, home equity and student loans; both fixed and floating rate. At the time of purchase must have a minimum credit rating by <u>at least one</u> of the NRSROs (i.e. S&P, Moody’s) of: Long Term: A- or A3 Short Term: A1 or P1	25%
4.	<u>Corporate Bonds</u> U.S. dollar-denominated debt obligations of corporations including, but not limited to, floating rate notes, medium-term notes, bonds, debentures, and repurchase agreements. At the time of purchase corporate bonds must have a minimum long-term credit rating by <u>at least one</u> of the NRSROs (i.e. S&P, Moody’s) of “BBB/Baa”. Total corporate bonds maximum of 60%. A-/A3 BBB/Baa2	60% 25%

5.	<u>Taxable Municipal Bonds:</u> Obligations of the U.S. states, local governments, and other municipal entities, that are taxable, including General Obligation and Revenue bonds, commercial paper, and Variable Rate Demand Notes (VRDNs). At the time of purchase must have a minimum credit rating by <u>at least one</u> of the NRSROs (i.e. S&P, Moody's) of "BBB/Baa".	25%
6.	<u>Money Market Funds:</u> Money Market Fund (may include Corporate Securities) At the time of purchase must have a credit rating by the NRSROs (i.e. S&P, Moody's) of "AAAm".	100%

H. Asset Allocation Guidelines

Advisor combines a diversified, asset allocation strategy with periodic rebalancing in order to seek optimal returns commensurate with assumed levels of risk while meeting the client's investment objectives. In its role as discretionary investment manager, Advisor may adjust the Benchmark Target for Sub-Asset classes from time to time as it deems appropriate. Advisor makes "Tactical" (near-term) allocations which fall within the Minimum-Maximum ranges noted below and may be higher or lower than the "Benchmark Target". Tactical allocations are based upon Advisor's judgment given the prevailing economic and market conditions.

Asset Classes Sub-Asset Classes	Minimum	Benchmark Target	Maximum	Benchmark Index
Cash Equivalents	0%	2%	15%	Citigroup 1 Month Treasury Bill
Total Fixed Income:	45%	70%	85%	ICE BofAML 1-10 Yr AAA-A Govt/Corp
*Total Equity:	15%	28%	40%	Blend

*Eligible Equities – Mutual Funds and Exchange Traded Funds (ETFs)

I. Performance Benchmark

The Performance Benchmark will be a weighted blend of the Benchmark Indexes noted below, utilizing the Benchmark Target as determined by Advisor.

Primary Benchmark:

Cash Equivalents - Citigroup 1 Month Treasury bill: 2%

Fixed Income - ICE BofAML 1-10 Yr Govt/Corp: 70%

Equity - Russell 1000: 18.3%, Russell 2000: 1.4%, MSCI EAFE (net) 7.3%, MSCI Emerging Markets (net): 1%

A Supplemental benchmark utilizing the Benchmark Targets above and ESG indices may be added to performance reports as appropriate.

J. Client Communications

The Advisor shall keep the Client apprised of any material changes in Advisor's outlook, recommended investment policy and strategy, and credit quality downgrades. In addition, Advisor shall issue reports, meet with the Client, and give notification as specified below.

1. Reports:

The Advisor will provide to the Client in writing a quarterly economic analysis and performance report for each Portfolio unless otherwise specified.

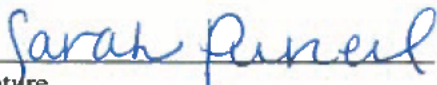
2. Meetings:

The Advisor will offer to meet in person annually with the Client at a mutually agreeable time and place unless otherwise specified, to review and explain the Portfolio's investment results and related information. Additional communications may be made by telephone and email.

By signing below, the Client acknowledges an understanding of these guidelines and agrees that they will remain in effect until Advisor receives written notice from the Client to the contrary. Client agrees that the IPS of this Portfolio shall be governed by the Investment Management Agreement ("Agreement") by and between Advisor and Client. In the event of a conflict or discrepancy between this IPS and the Agreement, the Agreement shall be controlling.

Accepted:

For: NATURAL HERITAGE TRUST – Capital Projects/Reserve Accounts

By: Sarah Purcell 
Name Signature
Deputy Director & Chief Financial Officer 2/24/21
Title Date

For: WILMINGTON TRUST INVESTMENT ADVISORS, INC.

By: Stephen Seivold 
Name Signature
VP, Institutional Investment Advisor 2/24/2021
Title Date

SCHEDULE A
ACCOUNT LISTING

CAPITAL PROJECTS/RESERVE ACCOUNTS

- Bayard Cutting Arboretum - [REDACTED]
- Main Reserve - [REDACTED]

Approval for: NATURTAL HERITAGE TRUST – Capital Projects/Reserve Accounts

By: Sarah Purcell
Name

Deputy Director & Chief Financial Officer
Title

Sarah Purcell
Signature

2/24/21
Date

INVESTMENT POLICY STATEMENT for
NATURAL HERITAGE TRUST – Endowment/Long-Term Investment Accounts
MANAGED by WILMINGTON TRUST INVESTMENT ADVISORS, INC.

PURPOSE

The purpose of this Investment Policy Statement (IPS) is to establish a clear understanding between **Wilmington Trust Investment Advisors, Inc.** (“Advisor”) and **Natural Heritage Trust** (“Client”) regarding the investment goals and objectives, and the management guidelines applicable to the Client’s investment portfolio (“Portfolio”). This Investment Policy Statement will:

- Establish reasonable expectations, goals, objectives and guidelines in the investment of the Portfolio’s assets.
- Create the framework for an appropriately diversified asset mix that can be expected to generate acceptable returns at a level of risk suitable to the Client, including:
 - specifying the investment strategy and target asset allocation policy
 - establishing investment guidelines regarding the permissible securities and diversification of assets
 - specifying the criteria for evaluating the performance of the Portfolio’s assets
- Encourage effective communication between the Advisor and Client

This IPS is intended to reflect the Client’s investment philosophy and guidelines governing the investment of the Portfolio under normal market conditions. This IPS should reflect the Client’s current status and philosophy should be reviewed and revised periodically to ensure it adequately reflects significant changes related to the Client’s circumstances, investment goals and objectives, or the capital markets. It is understood that there can be no guarantee about the attainment of the goals or investment objectives outlined herein.

A. Investment Objective

NHT’s mission is to receive and administer gifts, grants and contributions to further public programs for parks, recreation, cultural, land and water conservation and historic preservation purposes of the State of New York.

- Consistent with NHT’s mission, the portfolio will utilize sustainable strategies that incorporate Environmental, Social and Governance criteria in their security selection
- The Portfolio will use a Total Return approach intended to generate returns from both capital appreciation and income over the specified time horizon.
- Risk, measured in terms of portfolio volatility, is anticipated to be similar to that of the broader financial markets.
- Portfolio performance should exceed the benchmark performance over a 5-year moving time period (average market cycle).

The Client-defined level of preferred risk and return for the Portfolio is characterized by selection of one of the following MTBIA investment objectives and/or as modified by *(E.) Portfolio Profile* or *(G.) Asset Allocation Guidelines*:

Conservative:___ Income & Growth:___ **Growth & Income: X** Growth:___ Aggressive Growth:___

B. Sustainable Investing

Sustainable investments seek to encourage sustainable business practices and ethical behavior of companies. Sustainable investing is based on a set of standards that consider environmental, social and governance (ESG) factors to evaluate risk and potential reward alongside traditional financial analysis to achieve financial objectives.

Examples of ESG factors are:

1. Environmental – Emissions intensity, renewable usage and water efficiency
2. Social – Workforce diversity, health and safety policy, policy against child labor
3. Governance – Accounting practices, independent and diverse board of directors, share class voting rights

Equity and fixed income investments will be made in sustainable strategies unless a suitable strategy is not available.

C. Asset Allocation Strategy: Traditional Asset Classes

This strategy utilizes an extensive range of traditional asset classes. “Traditional asset classes” include domestic & international: stocks, bonds and cash securities. A wide variety of structures may be used to represent this range of asset classes such as: Closed/Open-end Mutual Funds, Exchange Traded Funds, Separately Managed Accounts or Strategies. Where Funds are used, they shall have a fundamental investment policy that is in general accordance with the intent of this statement.

D. Prohibited Investments

Currently excluded from “Traditional Asset Classes” are illiquid asset classes and vehicles that do not have daily liquidity. This includes, but is not limited to, most hedge funds, private equity, physical real estate, and physical commodities. Also excluded are individual investment in private placements, letter stock, short sales and margin transactions. Collars, forwards, futures, options and other hedging strategies will not be utilized without Client’s prior approval.

E. Client Profile

Organization [Corporate, Individual, Limited Partnership, Public, Not For Profit, Union]: Not-For-Profit/Public
Industry/ Line of Business [NAICS sectors]: _____
Fiscal Year End: March 31st

F. Portfolio Profile

Purpose of Portfolio Funds: Trust
Time Horizon [short (< 3 years), medium (3-5 years), long-term (> 5 years)]: Long-term
Liquidity Needs/Income Needs (payment/time period): As Requested
Tax Consequences (taxable, tax-exempt): Tax-exempt
Amortize/Accrete Premium/Discount securities: Yes ___ No X

Retirement [Deferred Comp, Defined Benefit, Defined Contribution/Profit Sharing, Health & Welfare/VEBA, IRA, Not Retirement, Other]: _____ ERISA: Yes ___ No X
Required Actuarial or Spending Policy Rate: _____

Trading Constraints:

Full Investment Manager discretion: Yes *X No _____
Other: *Trade letter is provided by Advisor within 3 business days of any purchase or sale. Client may disapprove of the transaction within 5 business days. Gains and losses from transactions completed in compliance with the IPS will be for the account.

G. Advisor Separately Managed Fixed Income Parameters

1. Investment/Credit Restrictions shall be at time of purchase and use the lower of the allowable credit ratings:

- Single issuer concentration shall be limited to 5% of the portfolio, other than for U.S. Treasuries, Government Agencies and MBS, **limited to 20% per GSE.**
- For Municipal Securities, the single security issue shall be limited to 5% of the portfolio.

2. Maturity Restrictions shall be at time of purchase:

- The Maximum Final Maturity for any single issue will not exceed 10 years.
- The Portfolio Average Effective Duration will not exceed 7 years and will be within +/- 20% of the specified performance benchmark.

3. Bond Ratings:

Bonds must be rated at least “BBB/Baa” at time of purchase by S&P or Moody’s. If individually managed fixed income securities fall below the credit quality restrictions applied at time of purchase, the Investment Manager will notify the client in a reasonable period of time following the rating downgrade. This will extend to any obligation that has been downgraded 1 level from the minimum required long-term credit rating. If the obligation is downgraded more than 1 level from the minimum the Investment Officer has 120 days to dispose of that obligation.

4. Prohibited Investments not included in Section C. shall be:

- Non U.S. dollar-denominated securities

5. Eligible Fixed Income Investments include: Portfolio concentrations shall use *Market Values at Time of Purchase* and use the *Lower of the allowable credit ratings*. **Note:** Fixed Income mutual funds and ETF’s are also eligible that are consistent with the parameters below.

	<i>ITEM</i>	Portfolio % Limit
1.	<u>Treasury Securities:</u> U.S. Treasury obligations, including Bills, Notes and Bonds. Both Nominal and TIPS.	100%
2.	<u>Government Sponsored Agencies:</u> U.S. Government-guaranteed and Government sponsored corporations and agencies, including mortgage-backed securities (MBS) and collateralized mortgage obligations (CMO) *no more than 20% in any specific GSE.	35%*
3.	<u>Asset-Backed Securities (“ABS”):</u> ABS collateralized by, but not limited to, credit card, auto, home equity and student loans; both fixed and floating rate. At the time of purchase must have a minimum credit rating by <u>at least one</u> of the NRSROs (i.e. S&P, Moody’s) of: Long Term: A- or A3 Short Term: A1 or P1	25%
4.	<u>Corporate Bonds</u> U.S. dollar-denominated debt obligations of corporations including, but not limited to, floating rate notes, medium-term notes, bonds, debentures, and repurchase agreements. At the time of purchase corporate bonds must have a minimum long-term credit rating by <u>at least one</u> of the NRSROs (i.e. S&P, Moody’s) of “BBB/Baa”. Total corporate bonds maximum of 60%. A-/A3 BBB/Baa2	60% 25%

5.	<p><u>Taxable Municipal Bonds:</u> Obligations of the U.S. states, local governments, and other municipal entities, that are taxable, including General Obligation and Revenue bonds, commercial paper, and Variable Rate Demand Notes (VRDNs). At the time of purchase must have a minimum credit rating by <u>at least one</u> of the NRSROs (i.e. S&P, Moody's) of "BBB/Baa".</p>	25%
6.	<p><u>Money Market Funds:</u> Money Market Fund (may include Corporate Securities) At the time of purchase must have a credit rating by the NRSROs (i.e. S&P, Moody's) of "AAAm".</p>	100%

H. Asset Allocation Guidelines

Advisor combines a diversified, asset allocation strategy with periodic rebalancing in order to seek optimal returns commensurate with assumed levels of risk while meeting the client's investment objectives. In its role as discretionary investment manager, Advisor may adjust the Benchmark Target for Sub-Asset classes from time to time as it deems appropriate. Advisor makes "Tactical" (near-term) allocations which fall within the Minimum-Maximum ranges noted below and may be higher or lower than the "Benchmark Target". Tactical allocations are based upon Advisor's judgment given the prevailing economic and market conditions.

Asset Classes Sub-Asset Classes	Minimum	Benchmark Target	Maximum	Benchmark Index
Cash Equivalents	0%	2%	15%	Citigroup 1 Month Treasury Bill
Total Fixed Income:	20%	38%	50%	ICE BofAML 1-10 Yr Govt/Corp
*Total Equity:	45%	60%	70%	Blend

*Eligible Equities – Mutual Funds and Exchange Traded Funds (ETFs)

I. Performance Benchmark

The Performance Benchmark will be a weighted blend of the Benchmark Indexes noted below, utilizing the Benchmark Target as determined by Advisor.

Primary Benchmark:

Cash Equivalents - Citigroup 1 Month Treasury bill: 2%

Fixed Income - ICE BofAML 1-10 Yr Govt/Corp: 38%

Equity - Russell 1000: 32%, Russell 2000: 8%, MSCI EAFE (net) 14.8%, MSCI Emerging Markets (net): 5.2%

A Supplemental benchmark utilizing the Benchmark Targets above and ESG indices may be added to performance reports as appropriate.

J. Client Communications

The Advisor shall keep the Client apprised of any material changes in Advisor's outlook, recommended investment policy and strategy, and credit quality downgrades. In addition, Advisor shall issue reports, meet with the Client, and give notification as specified below.

1. Reports:

The Advisor will provide to the Client in writing a quarterly economic analysis and performance report for each Portfolio unless otherwise specified.

2. Meetings:

The Advisor will offer to meet in person annually with the Client at a mutually agreeable time and place unless otherwise specified, to review and explain the Portfolio's investment results and related information. Additional communications may be made by telephone and email.

By signing below, the Client acknowledges an understanding of these guidelines and agrees that they will remain in effect until Advisor receives written notice from the Client to the contrary. Client agrees that the IPS of this Portfolio shall be governed by the Investment Management Agreement ("Agreement") by and between Advisor and Client. In the event of a conflict or discrepancy between this IPS and the Agreement, the Agreement shall be controlling.

Accepted:

For: NATURAL HERITAGE TRUST – Endowment/Long-Term Investment Accounts

By: Sarah Purcell *Sarah Purcell*
Name Signature
Deputy Director & Chief Financial Officer 2/24/21
Title Date

For: WILMINGTON TRUST INVESTMENT ADVISORS, INC.

By: Stephen Seivold *Stephen Seivold*
Name Signature
VP, Institutional Investment Advisor 2/24/2021
Title Date

**SCHEDULE A
ACCOUNT LISTING**

ENDOWMENT/LONG-TERM ACCOUNTS

- Huttleston - [REDACTED]
- Emma Treadwell Thacher - [REDACTED]
- Mount Loretto - [REDACTED]
- Four Freedoms Memorial - [REDACTED]
- Minnewaska State Park - [REDACTED]
- Rockefeller State Park Preserve - [REDACTED]
- Sampson Veteran's Museum - [REDACTED]
- Hempstead Lake - [REDACTED]
- Humphrey Letchworth NC - [REDACTED]
- Hallock State Park - [REDACTED]
- Harriman State Park Stewardship - [REDACTED]
- Harriman Nature Museum & Environmental Education Center - [REDACTED]
- Main LTI - [REDACTED]

Approval for: NATURTAL HERITAGE TRUST – Endowment/Long-Term Accounts

By: Sarah Purcell
Name

Deputy Director & Chief Financial Officer
Title

Sarah Purcell
Signature

2/24/21
Date



WOJESKI & COMPANY CPAs, P.C.

159 Wolf Road, Albany, New York 12205 | Phone 518-477-1102 | Fax 518-477-1302 | www.wojeskico.com

INDEPENDENT ACCOUNTANT'S REPORT ON COMPLIANCE WITH SECTION 2925(3)(f) OF THE NEW YORK STATE PUBLIC AUTHORITIES LAW AND ON INTERNAL CONTROL OVER COMPLIANCE BASED ON AN EXAMINATION PERFORMED IN ACCORDANCE WITH GOVERNMENT AUDITING STANDARDS

To the Board of Directors
Natural Heritage Trust

Report on Compliance with Section 2925(3)(F) of the New York State Public Authorities Law

We have examined Natural Heritage Trust's (the "Trust") compliance with its own investment guidelines, and with the requirements of Section 2925(3)(f) of the New York State (NYS) Public Authorities Law for the year ended March 31, 2023. Management of the Trust is responsible for the compliance with the specified requirements. Our responsibility is to express an opinion on the Trust's compliance with the specified requirements based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and the standards applicable to attestation engagements contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether the Trust complied, in all material respects, with the specified requirements referenced above. An examination involves performing procedures to obtain evidence about whether the Trust complied with the specified requirements. The nature, timing and extent of the procedures selected depend on our judgement, including an assessment of the risks of material misstatement, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the examination engagement.

Our examination does not provide a legal determination on the Trust's compliance with specified requirements.

In our opinion, the Trust complied, in all material respects, with the aforementioned requirements for the year ended March 31, 2023.

Report on Internal Control Over Compliance

Management of the Trust is responsible for establishing and maintaining effective internal control over compliance with the specified requirements referred to above. In planning and performing our audit of compliance with the specified requirements, we considered the Trust's internal control over compliance with the specified requirements to determine the examination procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance with the specified requirements, but not for the

purpose of expressing an opinion on the effectiveness of internal control over compliance with the specified requirements. Accordingly, we do not express an opinion on the effectiveness of the Trust's internal control over compliance with the specified requirements.

A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with the specified requirements on a timely basis. A *material weakness in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with the specified requirements will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with the specified requirements that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, material weaknesses or significant deficiencies may exist that have not been identified.

This report is intended solely for the information and use of management, the Board of Directors of Natural Heritage Trust, the New York State Office of the State Comptroller and the Authority Budget Office and is not intended to be, and should not be, used for anyone other than these specified parties.

Wojeski & Company, CPAs, P.C.

Albany, New York
June 29, 2023