

ORDINANCE NO. 11-139

AN ORDINANCE OF THE TOWN COUNCIL OF THE TOWN OF MIAMI LAKES, FLORIDA, TO IMPLEMENT AN INVESTMENT POLICY FOR THE TOWN'S SURPLUS FUNDS; AUTHORIZING THE TOWN MANAGER TO TAKE ALL NECESSARY ACTIONS TO IMPLEMENT THE INVESTMENT POLICY; PROVIDING FOR INCORPORATION OF RECITALS; PROVIDING FOR CONFLICTS; PROVIDING FOR SEVERABILITY; PROVIDING FOR INCLUSION IN THE CODE; AND PROVIDING FOR AN EFFECTIVE DATE.

WHEREAS, the Town Council recently acquired the services of Estrada Hinojosa Company, as investment advisors for the Town of Miami Lakes; and

WHEREAS, banking services are now moving away from providing returns on funds in commercial accounts, and are charging government agencies fees for FDIC insurance and eliminating returns on cash deposited; and

WHEREAS, the Town staff has worked with Estrada Hinojosa Company, Inc., and have determined it is beneficial to develop and implement an Investment Policy that will provide an option to invest excess cash in more than one investment pool; and

WHEREAS, the Town Council desires to exercise its fiduciary responsibility to preserve the Town cash reserve by implementing an Investment Policy as per the proposed Investment Policy, in conformance with all applicable statutes related to such investments.

NOW THEREFORE, BE IT ORDAINED BY THE TOWN COUNCIL OF THE TOWN OF MIAMI LAKES, FLORIDA, AS FOLLOWS:

Section 1. Recitals. Each of the above stated recitals are true and correct and are incorporated herein by this reference.

Section 2. The following is adopted as the Town of Miami Lakes Investment Policy:

Town of Miami Lakes, Florida

Investment Policy

It is the policy of the Town of Miami Lakes (the "Town") that all available funds shall be invested in conformance with applicable Florida State Statute Chapters including, but not limited to, Chapter 218, Part IV Investment of Local Government Surplus Funds, Chapter 219 County Public Money Handling by State and County, s. 218.415 Local Government Investment Policies and Chapter 280 Security for Public Deposits, this Policy, and any other authorized written administrative procedures.

Effective cash management is recognized as essential to good fiscal management. An effective cash management and investment policy will be pursued to take advantage of investment interest as viable and material revenue to all operating and capital funds. The Town's portfolio shall be designed and managed in a manner responsive to the public trust and consistent with state and federal law.

Investments shall be made with the primary objectives in order of importance:

- Safety,
- Liquidity, and
- Risk-commensurate Investment Income.

To ensure these objectives are attained, the Town will pursue:

- Preservation of capital and protection of principal,
- Maintenance of sufficient liquidity to meet operating needs,
- Security of Town funds and investments,
- Diversification of investments to avoid unreasonable or avoidable risks, and
- Optimization of interest earnings.

This Policy is to be authorized by the Town Council in accordance with Chapter 218, Section 415 of the Florida Statutes.

Scope

This Policy shall govern the investment of all financial assets of the Town as accounted for in the Town's Financial Statements, including but not limited to, general, enterprise, debt service, capital project and special revenue funds, with the exception of funds specifically organized and administered separately (including but not limited to those assets owned by a 501(c)(3) tax exempt charitable organization controlled by the Town, pension and deferred compensation funds, and funds held under Bond Trust Indenture for defeased Town debt).

When possible, the Town will consolidate cash balances to enhance investment earnings. Investment income will be allocated, if necessary, to the various funds based on their respective participation and in accordance with generally accepted accounting principles.

This Policy shall apply to all transactions involving the financial assets and related activity of the Town.

Additionally, all bond proceeds and related funds shall be invested according to the restrictions and/or requirements of the related bond covenants.

Delegation of Authority

The Town Manager and Director of Finance are designated as Investment Officers of the Town and are responsible for investment decisions, activities, and transactions for the Town's investment portfolio. The Director of Finance is designated as the Primary Investment Officer and is responsible for day-to-day investment decisions and activities. The Primary Investment Officer may delegate certain aspects of day-to-day administration of the cash management program as part of the written "Internal Controls."

No person may engage in an investment transaction except as provided under the terms of this Policy and the procedures so established. The Town Council may appoint an outside Investment Advisor to assist in the management of the Town's investment portfolio. Such Advisor must be registered under the Investment Advisors Act of 1940.

The Mayor, Town Manager, and the Finance Director are authorized signatories to initiate or approve wire transfer transactions in accordance with applicable policies and procedures.

Investment Committee

There is hereby created an Investment Committee, consisting of the Town Manager, Finance Director, Director of Budget and Administration, and two Town residents, with financial investment expertise, appointed by the Town Manager.

The Investment Committee shall meet periodically to review general strategies and monitor overall portfolio performance. The Committee shall include in its deliberations such topics as:

- Economic outlook,
- Portfolio diversification,
- Maturity structure,
- Risk considerations,
- Authorized broker/dealers,
- Target rate of return on the portfolio, and
- Any other responsibilities assigned to the Committee by the Town Manager.

The Investment Committee shall establish its rules of procedure and provide for minutes of its meetings. Any two members of the Committee may request a meeting, and three members shall constitute a quorum.

Investment Objectives

The Town shall manage and invest its cash with three primary objectives, listed in order of priority: safety, liquidity, and risk-commensurate investment income. The safety of the principal invested always remains the primary objective. All investments shall be designed and managed in a manner responsive to the public trust and consistent with state and local law.

The Town shall maintain a comprehensive cash management program, which includes collection of account receivables, vendor payments in accordance with invoice terms, and prudent investment of available cash. Cash management is defined as the process of managing monies in order to ensure maximum cash availability and enhancing earnings on short-term investment of idle cash.

Safety

Safety of principal is the foremost objective of the investment program. Investments shall be undertaken in a manner that seeks to ensure the preservation of capital in the overall portfolio. The objective will be to mitigate credit and interest rate risk.

- ❑ Credit Risk – The Town will minimize credit risk, the risk of loss due to the failure of the issuer or backer of the investment, by:
 - Limiting investments to the safest types of issuers,
 - Pre-qualifying the financial institutions, pools, money market mutual funds, and broker/dealers with which the Town will do business, and
 - Diversifying the investment portfolio so that potential losses on individual issuers will be minimized.

- ❑ Interest Rate Risk – the Town will minimize the risk that investment earnings will deviate from budget and that the portfolio will be forced to realize market gains or losses, by:
 - Structuring investments to meet cash requirements and
 - Diversifying maturities and staggering purchase dates to minimize the
 - impact of market movements over time.

Liquidity

The investment portfolio shall remain sufficiently liquid to meet all operating requirements that may be reasonably anticipated. This will be accomplished by structuring the portfolio so that investments mature concurrent with cash needs, and maintaining a portion of the portfolio in short-term, cash equivalent investments.

Risk-Commensurate Investment Income

The investment portfolio shall be designed with the objective of attaining risk commensurate investment income throughout budgetary and economic cycles, taking into account the investment risk constraints and liquidity needs. Return on investment is of secondary importance compared to the safety and liquidity objectives described above.

Performance Measurement and Fund Strategies

As required by state law, the Town will establish performance measures by selecting benchmarks that are appropriate for the prudent management of each of the fund types and monitoring the results on no less than a quarterly basis.

General and Enterprise Funds – Investment strategies for General and Enterprise Funds will have as their primary objective to assure that anticipated cash flows are matched with adequate investment liquidity. The secondary objective is to create a portfolio structure that will experience minimal volatility during economic cycles. This may be accomplished by purchasing high quality, short to medium-term investments that will complement each other in a laddered maturity structure. The dollar weighted average maturity of 365 days or less will be calculated using the stated final maturity date of each investment. Funds shall be managed and invested with the objectives of safety, liquidity and yield (listed in order of priority). The performance of the general funds will be measured against the 6-month U.S. Treasury Bill index.

Debt Service Funds – Investment strategies for Debt Service Funds shall have as the primary objective the assurance of investment liquidity adequate to cover the debt service obligation on the required payment date. Investments purchased shall not have a stated final maturity date that exceeds the next unfunded debt service payment date. Funds shall be managed and invested with the objectives of safety, liquidity and yield (listed in order of priority). The performance of the debt service funds will be measured against the 3-month U.S. Treasury Bill index.

Capital Project and Special Revenue Funds - Investment strategies for Capital Project and Special Revenue Funds will have as their primary objectives to assure that anticipated cash flows are matched with adequate investment liquidity. These portfolios should include at least 10% in cash equivalent investments to allow for flexibility and unanticipated project outlays. The stated final maturity dates of securities held should not exceed the estimated project completion date. Funds shall be managed and invested with the objectives of safety, liquidity and yield (listed in order of priority). The performance of the capital project or special purpose funds will be measured against the performance of the U.S. Treasury Bill index that represents a comparable maturity range.

Prudence and Ethical Standards

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 income to be derived from the investment.

This “prudent person” standard shall be applied in the context of managing an overall portfolio. Investment Officers acting in accordance with written procedures and the Investment Policy and exercising due diligence shall be relieved of personal responsibility for an individual investment’s credit risk or market price changes, provided deviations from expectations are reported in a timely fashion, and after review, take action as appropriate to control adverse developments.

All participants in the Town’s investment process shall seek to act responsibly as custodians of the public trust. The Investment Officer(s) shall avoid any transaction that might impair public confidence in the Town’s ability to govern effectively. Additionally, the Investment Officer(s) will adhere to the Miami-Dade County Code of Ethics which applies to all municipal officials, officers and employees.

Investment Officers involved in the investment process shall refrain from personal business activity that could conflict with proper execution of the investment program, or which could impair their ability to make impartial investment decisions, and should disclose any material personal interests that could be construed as conflicts to the Town Manager.

In determining whether the Investment Officer(s) or Investment Advisor has exercised prudence with respect to an investment decision, the investment of all funds over which the Officer/Advisor had responsibility, rather than the prudence of a single investment, and whether the investment decision was consistent with the Investment Policy, shall be considered.

Authorized Investments

The Town is empowered by the state law and this Investment Policy to invest in the following types of securities:

1. Direct obligations of the U.S. Government, its Agencies or Instrumentalities;
2. Securities and Exchange Commission registered money market mutual funds with the highest credit quality rating from a nationally recognized rating agency;
3. Insured or fully collateralized Certificates of Deposit and other forms of deposit in financial institutions that are qualified public depositories of the State as determined by the State Treasurer, in accordance with Chapter 280.02 of the Florida Statutes;
4. Financial institution deposits that are in Qualified Public Depositories of the State in accordance with Chapter 280.02, Florida Statutes, where the selected depository arranges for the deposit of the funds in certificates of deposit in one or more federally insured financial institutions, wherever located, for the account of the Town in amounts that ensure that each certificate of deposit is insured by the Federal Deposit Insurance Corporation, and meet the requirements of Chapter 218.415 (23), Florida Statutes;
5. Intergovernmental investment pools authorized pursuant to the Florida Interlocal Cooperation Act functioning as a money market mutual fund with the highest credit quality rating from a nationally recognized rating agency; and

6. Repurchase agreements secured by direct obligations of the U.S. Government, its Agencies or Instrumentalities, pledged with an independent third party approved by the Town, and having a market value of not less than 102% of investment balance plus accrued interest. All repurchase agreement transactions shall be governed in accordance with a master repurchase agreement executed in compliance with State law.

Maturity Limitations

In order to ensure adequate liquidity to meet financial obligations, the Town will attempt to match investment maturities with known cash needs and anticipated cash flow requirements. Investment maturities for operating and debt service funds shall not exceed two years, and capital project or special purpose funds shall not exceed three years.

Diversification Statement

Diversification of the portfolio remains as the most effective means of protecting the portfolio from overexposure to liquidity, credit, and market risks. To avoid unnecessary risk, the portfolio will be diversified by issuer, maturity, and sector, as appropriate.

Authorized Financial Institutions and Broker/Dealers

Depository

A primary depository may be selected through the Town's banking services procurement process. The selection of a depository will be determined by evaluation of proposals based on the following selection criteria:

- The ability to qualify as a Qualified Bank Depository for public funds in accordance with State law.
- The ability to provide requested information or financial statements for the periods specified.
- The ability to meet all requirements in the banking RFP.
- Complete response to all required items in the banking RFP.
- "Best value" net banking service cost, consistent with the ability to provide an appropriate level of service.
- The credit worthiness and financial stability of the bank.

All primary and non-primary depository deposits shall be insured or collateralized in compliance with applicable State law. The Town reserves the right, in its sole discretion, to accept or reject any form of insurance or collateralization pledged towards depository deposits.

Broker/Dealers

The Investment Officer(s) shall maintain a list of broker/dealers that are approved for investment purposes. Only firms meeting the following requirements shall be eligible to serve as broker/dealer:

1. Qualify under Securities and Exchange Commission Rule 15 C3-1 (uniform net capital rule);
2. Registered as a dealer under the Securities Exchange Act of 1934;
3. Member of the Financial Industry Regulatory Authority (FINRA); and
4. Registered to sell securities in Florida.

Third Party Custodians

The Town shall contract with a bank or banks for the safekeeping or custody of securities owned by the Town as part of its investment portfolio or pledged to the Town as collateral.

Securities owned by the Town shall be evidenced by safekeeping receipts of the institution holding the securities. Safekeeping institutions shall be independent from the parties involved in the investment transaction.

Subject to the Public Deposits Program requirements, securities pledged to the Town shall be evidenced by custodial pledge receipts of the institution holding the securities. Custodial institutions shall be independent from the parties involved in the investment transaction.

All security transactions shall utilize the "Delivery Versus Payment" procedure for settlement.

Subject to Audit

All collateral shall be subject to inspection and audit by the Town's designated financial officer or the Town's independent auditors.

Competitive Conditions

It is the policy of the Town to create a competitive environment for all investment activities. To achieve that objective, multiple investment sources and products will be considered, with the Investment Officer selecting the best value determined by an appropriate risk/return analysis.

Rather than relying solely on yield, investment in money market mutual funds and intergovernmental investment pools shall be based on criteria determined by the Town or its Investment Advisor to demonstrate reasonable and prudent investment strategies of the fund/pool.

At least three potential providers must be contacted in all transactions involving individual securities. Quotes may be solicited in any manner provided by law. For those situations where it may be impractical or unreasonable to receive three quotes for a transaction due to a rapidly

changing market environment or to secondary market availability, documentation of a competitive market survey of comparable options or an explanation of the specific circumstance must be included with the transaction documentation.

Internal Controls

The Primary Investment Officer shall establish written internal controls and operations procedures. The internal controls should be designed to prevent losses of funds, which might arise from fraud, error, misrepresentation, or imprudent actions. No person may engage in an investment transaction except as authorized under the terms of this Policy.

The controls and procedures shall address the following points:

- Control of collusion,
- Prevention of fraud,
- Reduction of employee error,
- Limitation of imprudent employee action,
- Separation of transactions authority from accounting and recordkeeping,
- Requirement of third-party custody and safekeeping,
- Clear delegation of authority to subordinate staff members,
- Prevention of misrepresentation by third parties,
- Written confirmation of all transactions for investments and wire transfers, and
- Adherence to all ethics and investment policies.

Continuing Education

In compliance with s.218.415(14), F.S., the Investment Officer(s) and any other staff responsible for investment-related activities shall annually complete eight (8) hours of continuing education in subjects or courses of study related to investment practices or products.

Reporting

The Investment Officer shall provide a quarterly investment report including the listing of holdings in the portfolio at cost and market value to the Town Council. Such reports shall include:

- Individual investment descriptions,
- Coupon/Discount rate and yield to maturity,
- Final maturity and call dates,
- Credit Ratings,
- Book value and market value, and
- Quarterly interest earnings.

Sale of Securities

When invested funds are needed prior to maturity of a security, or when more optimal investment positions are available and a swap would be deemed to be effective and prudent, the Town may sell a security at the then-prevailing market price.

In the event that an authorized investment loses its required minimum credit rating, all prudent measures will be taken to liquidate said investment. Additionally, the Town is not required to liquidate investments that were authorized at the time of purchase.

Audits

As part of its annual audit, the external auditing firm shall review adherence to the Investment Policy and compliance with State investment law. Additionally, the auditors shall conduct a review of the system of internal controls to ensure compliance with policies and procedures.

Selection of Investment Advisory Services

An RFP for Investment Advisory Services may be issued prior to the then current contract termination date. Proposals shall be received and ranked by a selection committee consistent with the Town's current PSA practices. Upon recommendation by the Town Manager and approval by the Town Council, a new contract can be signed.

Investment Policy Review

The Policy shall be subject to revisions consistent with changing laws, regulations, and needs of the Town. The Town Council shall review the Policy on a periodic basis and adopt a resolution stating that it has reviewed the Policy and approves any changes or modifications.

Section 3. Authorization of Town Manager. The Town Manager is hereby authorized to take all necessary actions to implement the Town of Miami Lakes, Florida, Investment Policy.

Section 4. Repeal of Conflicting Provisions. All provisions of the Code of the Town of Miami Lakes that are in conflict with this Ordinance are hereby repealed.

Section 5. Severability. The provisions of this Ordinance are declared to be severable and if any section, sentence, clause or phrase of this Ordinance shall for any reason be held to be invalid or unconstitutional, such decision shall not affect the validity of the remaining sections,

sentences, clauses, and phrases of this ordinance, but they shall remain in effect, it being the legislative intent that this Ordinance shall stand notwithstanding the invalidity of any part.

Section 6. Inclusion in the Code. It is the intention of the Town Council that the provisions of this Ordinance shall become and be made a part of the Code of Miami Lakes, Florida. The sections of this Ordinance may be renumbered or relettered to accomplish such intention, and the word “ordinance” may be changed to “section,” “article,” or other appropriate word.

Section 7. Effective Date. This Ordinance shall be effective immediately upon its adoption on second reading.

The foregoing Ordinance was offered by Councilmember Mary Collins, who moved its adoption on first reading. The motion was seconded by Councilmember Nick Perdomo and upon being put to a vote, the vote was as follows:

Mayor Michael Pizzi	yes
Vice-Mayor Ceasar Mestre	yes
Councilmember Mary Collins	yes
Councilmember Tim Daubert	yes
Councilmember Nelson Hernandez	yes
Councilmember Nick Perdomo	yes
Councilmember Richard Pulido	yes

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Ordinance No. 11- 139

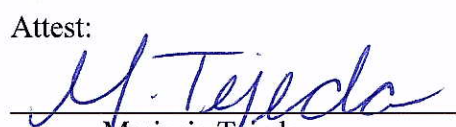
PASSED AND ADOPTED on first reading this 8th day of November, 2011.

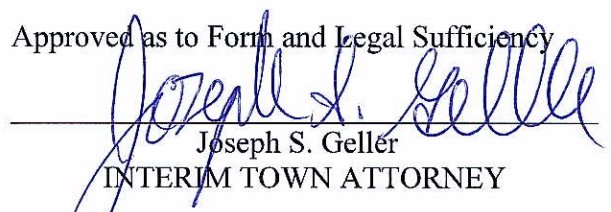
The foregoing Ordinance was offered by Councilmember Mary Collins who moved its adoption on second reading. The motion was seconded by Councilmember Michael Pizzi and upon being put to a vote, the vote was as follows:

Mayor Michael Pizzi	<u>yes</u>
Vice-Mayor Ceasar Mestre	<u>yes</u>
Councilmember Mary Collins	<u>yes</u>
Councilmember Tim Daubert	<u>yes</u>
Councilmember Nelson Hernandez	<u>yes</u>
Councilmember Nick Perdomo	<u>yes</u>
Councilmember Richard Pulido	<u>yes</u>

PASSED AND ADOPTED on second reading this 13 day of December, 2011.


Michael Pizzi
MAYOR

Attest:

Marjorie Tejada
TOWN CLERK

Approved as to Form and Legal Sufficiency

Joseph S. Geller
INTERIM TOWN ATTORNEY

Town of Miami Lakes, Florida

Investment Policy

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the objectives of safety, liquidity and yield (listed in order of priority). The performance of the capital project or special purpose funds will be measured against the performance of the U.S. Treasury Bill index that represents a comparable maturity range.

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Investment Officers involved in the investment process shall refrain from personal business activity that could conflict with proper execution of the investment program, or which could impair their ability to make impartial investment decisions, and should disclose any material personal interests that could be construed as conflicts to the Town Manager.

In determining whether the Investment Officer(s) or Investment Advisor has exercised prudence with respect to an investment decision, the investment of all funds over which the Officer/Advisor had responsibility, rather than the prudence of a single investment, and whether the investment decision was consistent with the Investment Policy, shall be considered.

Authorized Investments

The Town is empowered by the state law and this Investment Policy to invest in the following types of securities:

1. Direct obligations of the U.S. Government, its Agencies or Instrumentalities;

2. Securities and Exchange Commission registered money market mutual funds with the highest credit quality rating from a nationally recognized rating agency;
3. Insured or fully collateralized Certificates of Deposit and other forms of deposit in financial institutions that are qualified public depositories of the State as determined by the State Treasurer, in accordance with Chapter 280.02 of the Florida Statutes;
4. Financial institution deposits that are in Qualified Public Depositories of the State in accordance with Chapter 280.02, Florida Statutes, where the selected depository arranges for the deposit of the funds in certificates of deposit in one or more federally insured financial institutions, wherever located, for the account of the Town in amounts that ensure that each certificate of deposit is insured by the Federal Deposit Insurance Corporation, and meet the requirements of Chapter 218.415 (23), Florida Statutes;
5. Intergovernmental investment pools authorized pursuant to the Florida Interlocal Cooperation Act functioning as a money market mutual fund with the highest credit quality rating from a nationally recognized rating agency; and
6. Repurchase agreements secured by direct obligations of the U.S. Government, its Agencies or Instrumentalities, pledged with an independent third party approved by the Town, and having a market value of not less than 102% of investment balance plus accrued interest. All repurchase agreement transactions shall be governed in accordance with a master repurchase agreement executed in compliance with State law.

Maturity Limitations

In order to ensure adequate liquidity to meet financial obligations, the Town will attempt to match investment maturities with known cash needs and anticipated cash flow requirements. Investment maturities for operating and debt service funds shall not exceed two years, and capital project or special purpose funds shall not exceed three years.

Diversification Statement

Diversification of the portfolio remains as the most effective means of protecting the portfolio from overexposure to liquidity, credit, and market risks. To avoid unnecessary risk, the portfolio will be diversified by issuer, maturity, and sector, as appropriate.

Authorized Financial Institutions and Broker/Dealers

Depository

A primary depository may be selected through the Town's banking services procurement process. The selection of a depository will be determined by evaluation of proposals based on the following selection criteria:

- The ability to qualify as a Qualified Bank Depository for public funds in accordance with State law.
- The ability to provide requested information or financial statements for the periods specified.
- The ability to meet all requirements in the banking RFP.
- Complete response to all required items in the banking RFP.
- "Best value" net banking service cost, consistent with the ability to provide an appropriate level of service.
- The credit worthiness and financial stability of the bank.

All primary and non-primary depository deposits shall be insured or collateralized in compliance with applicable State law. The Town reserves the right, in its sole discretion, to accept or reject any form of insurance or collateralization pledged towards depository deposits.

Broker/Dealers

The Investment Officer(s) shall maintain a list of broker/dealers that are approved for investment purposes. Only firms meeting the following requirements shall be eligible to serve as broker/dealer:

1. Qualify under Securities and Exchange Commission Rule 15 C3-1 (uniform net capital rule);
2. Registered as a dealer under the Securities Exchange Act of 1934;
3. Member of the Financial Industry Regulatory Authority (FINRA); and
4. Registered to sell securities in Florida.

Third Party Custodians

The Town shall contract with a bank or banks for the safekeeping or custody of securities owned by the Town as part of its investment portfolio or pledged to the Town as collateral.

Securities owned by the Town shall be evidenced by safekeeping receipts of the institution holding the securities. Safekeeping institutions shall be independent from the parties involved in the investment transaction.

Subject to the Public Deposits Program requirements, securities pledged to the Town shall be evidenced by custodial pledge receipts of the institution holding the securities. Custodial institutions shall be independent from the parties involved in the investment transaction.

All security transactions shall utilize the "Delivery Versus Payment" procedure for settlement.

Subject to Audit

All collateral shall be subject to inspection and audit by the Town's designated financial officer or the Town's independent auditors.

Competitive Conditions

It is the policy of the Town to create a competitive environment for all investment activities. To achieve that objective, multiple investment sources and products will be considered, with the Investment Officer selecting the best value determined by an appropriate risk/return analysis.

Rather than relying solely on yield, investment in money market mutual funds and intergovernmental investment pools shall be based on criteria determined by the Town or its Investment Advisor to demonstrate reasonable and prudent investment strategies of the fund/pool.

At least three potential providers must be contacted in all transactions involving individual securities. Quotes may be solicited in any manner provided by law. For those situations where it may be impractical or unreasonable to receive three quotes for a transaction due to a rapidly changing market environment or to secondary market availability, documentation of a competitive market survey of comparable options or an explanation of the specific circumstance must be included with the transaction documentation.

Internal Controls

The Primary Investment Officer shall establish written internal controls and operations procedures. The internal controls should be designed to prevent losses of funds, which might arise from fraud, error, misrepresentation, or imprudent actions. No person may engage in an investment transaction except as authorized under the terms of this Policy.

The controls and procedures shall address the following points:

- Control of collusion,
- Prevention of fraud,
- Reduction of employee error,
- Limitation of imprudent employee action,
- Separation of transactions authority from accounting and record-keeping,
- Requirement of third-party custody and safekeeping,
- Clear delegation of authority to subordinate staff members,
- Prevention of misrepresentation by third parties,
- Written confirmation of all transactions for investments and wire transfers, and
- Adherence to all ethics and investment policies.

Continuing Education

In compliance with s.218.415(14), F.S., the Investment Officer(s) and any other staff responsible for investment-related activities shall annually complete eight (8) hours of continuing education in subjects or courses of study related to investment practices or products.

Reporting

The Investment Officer shall provide a quarterly investment report including the listing of holdings in the portfolio at cost and market value to the Town Council. Such reports shall include:

- Individual investment descriptions,
- Coupon/Discount rate and yield to maturity,
- Final maturity and call dates,
- Credit Ratings,
- Book value and market value, and
- Quarterly interest earnings.

Sale of Securities

When invested funds are needed prior to maturity of a security, or when more optimal investment positions are available and a swap would be deemed to be effective and prudent, the Town may sell a security at the then-prevailing market price.

In the event that an authorized investment loses its required minimum credit rating, all prudent measures will be taken to liquidate said investment. Additionally, the Town is not required to liquidate investments that were authorized at the time of purchase.

Audits

As part of its annual audit, the external auditing firm shall review adherence to the Investment Policy and compliance with State investment law. Additionally, the auditors shall conduct a review of the system of internal controls to ensure compliance with policies and procedures.

Selection of Investment Advisory Services

An RFP for Investment Advisory Services may be issued prior to the then current contract termination date. Proposals shall be received and ranked by a selection committee consistent with the Town's current PSA practices. Upon recommendation by the Town Manager and approval by the Town Council, a new contract can be signed.

Investment Policy Review

The Policy shall be subject to revisions consistent with changing laws, regulations, and needs of the Town. The Town Council shall review the Policy on a periodic basis and adopt a resolution stating that it has reviewed the Policy and approves any changes or modifications.