

CONSOLIDATED INVESTMENT FUND INVESTMENT POLICY



**THE UNIVERSITY OF
NEW MEXICO®**



**THE UNIVERSITY OF
NEW MEXICO®
FOUNDATION**

THE UNIVERSITY OF NEW MEXICO

THE UNIVERSITY OF NEW MEXICO FOUNDATION, INC.

February 14, 2023

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CONSOLIDATED INVESTMENT FUND POLICY STATEMENT

In accordance with Sections 21-1-38.B(1)(b) and 21-1-38.B(2), New Mexico Statutes Annotated 1978, the University of New Mexico Board of Regents (the “Board of Regents”) has designated the University of New Mexico Foundation Investment Committee (the “Investment Committee”) to act as the official Advisory Committee to oversee and manage the investment of both the University of New Mexico (the “University”)’s and the University of New Mexico Foundation, Inc. (the “Foundation”)’s endowment funds. The combined endowment assets of the University and the Foundation are known as the Consolidated Investment Fund (the “CIF”). The Investment Committee will apply the standards of conduct described in Sections 6-8-10 and 46-9A-1 through 46-9-12, NMSA 1978, in managing the CIF, subject to the standards set forth herein.

In accepting this responsibility, the Investment Committee agrees to follow the Consolidated Investment Fund Investment Policy (the “Policy”), which has been approved by the Board of Regents pursuant to Section 21-1-38.B(1)(c), NMSA 1978 and the Investment Committee of the Board of Trustees of the Foundation.

The Policy is to be effective February 14, 2023, and supersedes all previous versions.

The Policy governs the investment of gifts and donations to the University or the Foundation in the form of endowments, quasi-endowments, and other investments with long-term objectives. All common endowment and quasi-endowment funds of the University and the Foundation will be managed through the CIF. Participants in the CIF will receive units in the pooled fund. At all times the Policy shall recognize and implement all legally enforceable restrictions and directions that may have been placed on gifts by donors and the Policy shall comply with all applicable laws and shall be changed as necessary to comply with changes in applicable law or legal advice.

1. INVESTMENT PHILOSOPHY

The CIF has a long-term investment horizon, and allocates its assets accordingly. A strategic long-term asset allocation plan implemented in a consistent and disciplined manner that is consistent with the long and short-term needs of the University in carrying out its educational mission will be the major determinant of the CIF’s investment performance.

The assets will be managed on a total return basis. The Policy also recognizes the importance of preservation of capital. It is appropriate to consider alternative investment strategies if such strategies are in the CIF’s best interest on a risk-adjusted basis and are consistent with sufficient liquidity and investment risks that are prudent and reasonable, given the prevailing capital market conditions.

Risk management of the investment program is focused on understanding both the investment and operational risks to which the CIF is exposed. The objective is to minimize operational risks and realize an appropriate return for the investment risks that the Investment Committee is willing to accept.

2. INVESTMENT OBJECTIVES AND POLICIES

Return Goal: The long-term objective of the CIF is to earn a return sufficient to preserve the purchasing power of the CIF for future generations, as well as to provide for current needs and strategic investments. As a result, the goal is to achieve a long-term annual total return, net of management and custodial fees, that equals or exceeds the annual Spending Distribution, the annual Development Funding Allocation, and inflation as measured by the U.S. Department of Labor All Urban Consumer Price Index “CPI-U”.

Return Measurement: To achieve the Return Goal, the CIF assets will be invested to generate a total return consisting of market appreciation and depreciation and dividend and interest income. While there cannot be complete assurance that the Return Goal will be realized, it is believed that the likelihood of realization is enhanced by diversifying the assets of the CIF. Over time, the Policy will aim to achieve the Return Goal while maintaining acceptable risk levels. To accomplish this goal, the CIF will diversify assets among several differentiated asset classes. The following objectives are designed to support achievement of the Return Goal and are net of (after) investment expense:

- Total CIF assets should achieve a long-term annualized nominal rate of return equal to or greater than that of the Return Goal.
- In general, active managers will be expected to provide returns greater than their appropriate benchmark, net of fees, while utilizing acceptable risk levels. In contrast, passive managers will be expected to provide returns nearly identical to the appropriate benchmark, before reasonable fees, with no more volatility than the benchmark.

Preservation of Capital: Consistent with their respective investment styles and philosophies, investment managers shall make reasonable efforts to preserve capital, understanding that losses may occur in individual securities.

Cash Reserves: In accordance with the CIF's long-term investment horizon, a fully invested position should be maintained for the overall portfolio with minimal, but sufficient cash reserves to meet all current spending and capital calls.

Risk: All investments carry some degree of risk, which should be considered so that the CIF assets are managed in a manner consistent with investment objectives and strategies. Some of the key investment risks are the following:

- Overall Investment Risk - the probability of not maintaining purchasing power over the CIF's investment time horizon, net of spending and investment expenses.
- Operational Risk - the potential of loss arising from deficiencies in internal controls, human errors, physical systems failures and other business execution risks.
- Cash Flow Risk - the probability of not achieving the CIF's short term cash flow requirements.
- Compliance Risk - non-compliance with applicable State of New Mexico statutes concerning the investment of public funds.
- Interest Rate Risk - the potential for fluctuations in bond prices due to changes in interest rates and/or a duration/liability mismatch.
- Credit Risk - the possibility that a bond issuer will fail to make timely payment of either interest or principal to the portfolio.
- Reinvestment Risk - the possibility that the proceeds of a maturing or called security will be reinvested at lower yields as a result of a general interest rate decline in the bond market.
- Liquidity Risk - the possibility that the liquidity of the market for a security may decline thereby making it more difficult to dispose of the security promptly; presenting difficulties in valuation of the security; or causing the security to experience greater price volatility.

Asset Allocation: Asset allocation is the single most important decision which affects the CIF. The primary driver of investment returns can be attributed to (1) the asset classes/styles which are employed by the portfolio, and (2) the weighting of each asset class/style. Given its importance, the asset allocation will be reviewed at least annually and revised as necessary.

- The asset allocation shall be determined taking into consideration a comprehensive allocation study completed by the Investment Consultant and taking into consideration the asset allocations of peer institutions as published in the NACUBO-Commonfund Study of Endowments.
- The asset allocation shall be designed to give balance to the overall structure of the investment program over a long-term horizon.
- Asset allocation decisions will not be based on market timing. However, some factors may impact the policy allocation, thereby requiring an asset allocation review and possible rebalancing. Some of these factors may include a change in the assessment of the intermediate and long-term outlook for different types of asset classes and styles or a major divergence in the performance of the different asset classes and styles.
- In consultation with the Investment Consultant, specific target asset allocations may be established by the Investment Committee within the minimum and maximum ranges of the Policy to address current economic and/or market conditions while taking into account investments in University strategic priorities.

Assets shall be invested within the following maximum and minimum ranges for each asset class:

Percent of Total Assets		
Asset Class	Minimum	Maximum
Domestic Equity ¹	10%	50%
International Equity ¹	10%	40%
Fixed Income/Cash	5%	50%
Real Assets	0%	15%
Private Investments	0%	30%
Marketable Alternatives	0%	20%
Investments in University Strategic Priorities ²	0%	10.5%

¹ The combined maximum allocation to domestic and international equities shall not exceed 70% at any point in time.

² Investments in University Strategic Priorities include the following:

Direct Investments in University Strategic Priorities: Up to 10% of total CIF assets may be invested in University projects, subject to the following requirements:

1. Investments must be structured as a loan to the University or a University component unit.
2. Investments must have a defined payback term.
 - A. Open-ended investments are not allowed.
 - B. Maximum investment term is 10 years.
3. Maximum investment in each project is 5% of total CIF assets, measured at the time of the loan approval.
4. The interest rate must take into consideration:
 - A. The expected return of the CIF (as estimated by the Investment Consultant),
 - B. The loan term, and
 - C. The risk of the proposed investment.

5. Prior to consideration by the Investment Committee, the University's Executive Vice President for Finance and Administration must certify on behalf of the University President that the project is a University Strategic Priority.
6. Prior to consideration by the Investment Committee, the Foundation's CFO must certify that the proposed investment meets the criteria outlined in paragraphs 1-5, above.
7. Investments require Investment Committee approval based on the criteria outlined in paragraphs 1-5, above. To avoid any potential for or appearance of a conflict of interest, University officials who are voting members of the Investment Committee will not vote on the approval of loans to the University or any University component unit.

UNM Rainforest Innovations Co-Investments: Up to 0.5% of total CIF assets may be invested by the University of New Mexico's technology transfer nonprofit corporation, UNM Rainforest Innovations, in qualifying early stage venture capital investments. An investment will be considered a qualifying early stage venture capital investment if:

1. the investment is in a company created to utilize technologies transferred by UNM Rainforest Innovations;
2. the investment is matched on at least a 1 to 1 basis by a co-investor with experience in early stage capital ventures; and
3. UNM Rainforest Innovations has conducted due diligence on its own or in concert with a co-investor; and
4. UNM Rainforest Innovations provides the Investment Committee with reports regarding each specific early stage venture selected and quarterly updates thereafter to monitor the progress of the venture and the performance of the investment.

The University of New Mexico Foundation Investment Committee is not responsible for the evaluation, selection or management of any early stage venture capital investments made by UNM Rainforest Innovations with Consolidated Investment Fund assets.

It is anticipated that long-range returns for early stage venture capital investments will be equal to or better than the long-range expected return for the Consolidated Investment Fund.

Portfolio Rebalancing: It is desirable to rebalance the CIF's holdings periodically to minimize deviations from the Policy's asset allocation mix. The Investment Consultant shall inform the Investment Committee at the close of any quarter in which rebalancing the CIF is necessary. The Investment Committee shall review and approve any rebalancing actions and the Investment Consultant shall assist as needed in implementing such actions. If an asset class exceeds the maximum limit defined herein, no new investments will be added to that asset class.

Manager Concentration Limits: The Investment Consultant shall identify at the close of each quarter any actively managed investments which are in excess of 5% of total assets. The Investment Committee shall consider whether the concentration in these accounts warrants rebalancing towards a goal of 5%.

Passively managed investments and investments in University Strategic Priorities in excess of 5% will be identified in quarterly reports and monitored for compliance with asset allocation limits.

Spending Distribution: The Policy aims to distribute on an annual basis a percentage, established as discussed below, of the average market value of the CIF at the calendar year-end of the previous 20 quarters (the "Spending Distribution"). The Spending Distribution rate shall not exceed 6% nor be less than 4% of the 20-quarter average market value per unit. The Policy allows for the Spending Distribution regardless of whether the fair market value of an individual account exceeds its historic gift value, unless otherwise precluded by the donor or by law. This practice is consistent with the Uniform Prudent Management of Institutional Funds Act, and recognizes that not spending from an endowment is likely to be contrary to a donor's intent to provide

current benefits for the designated purpose. The Investment Committee shall establish at its first meeting of each calendar year the Spending Distribution to be used for the following fiscal year. The Investment Committee shall strive to maintain a Spending Distribution which achieves intergenerational equity, so today's beneficiaries do not unfairly benefit at the expense of future beneficiaries. In addition to considering this Policy and the objectives as stated above, the Investment Committee shall consider, if relevant, the following items in their annual deliberations to determine a reasonable Spending Distribution:

- The net rate of return earned by the CIF in each of the five most recent fiscal years.
- The net real (after adjusting for inflation as measured by the CPI-U) rate of return earned by the CIF in each of the five most recent fiscal years.
- Payout rates established by other university endowments as published in the NACUBO-Commonfund Study of Endowments.
- Other resources available to University and any unusual or extraordinary circumstances impacting these resources (tuition revenues, State appropriations, etc.).
- The extent to which programs benefiting from the Spending Distribution rely on these funds to achieve their goals and objectives.
- Recommendations from the CFO.
- The Spending Distribution in effect at the time of deliberations.
- General economic conditions.
- The possible effect of inflation or deflation.
- The expected total return of the CIF per the most recent asset allocation study.
- Significant inflows to and outflows from the CIF (if any)

Development Funding Allocation (the “DFA”): The Board of Regents and the Board of Trustees have agreed that a fair and reasonable uniform basis point fee applicable to all endowment accounts is an appropriate means to assist the operations of the Foundation. The DFA does not provide support for any direct costs of investing and administering the CIF, such as investment consultant fees, custodial fees and investment manager fees. These costs are assigned directly to the CIF. The DFA is subject to review and approval by the Board of Trustees and the Board of Regents as necessary.

The following items shall be considered in establishing a reasonable DFA:

- Any external costs including the Investment Consultant, custodian, and investment manager fees of managing the CIF.
- The internal (i.e., accounting, fund raising, information systems, gift administration) costs to raise funds for, manage the assets of and provide stewardship for the CIF.
- Cost Recovery Fee rates established by other university endowments if published in the NACUBO-Commonfund Study of Endowments.
- Recommendations from the CFO.
- The Development Funding Allocation in effect at the time of deliberations.
- The impact on the Spending Distribution.

Environmental, Social, and Governance (ESG) Considerations: The Investment Committee considers the endowment to be an economic resource in advancing UNM's mission and defines its fiduciary responsibility as investing and managing the endowment assets as set forth in the Policy. The CIF's assets shall be invested for the long-term using a diversified approach with the principal goal of generating an attractive return to provide continued support to UNM at a commensurate and acceptable level of risk. Implementation is guided by the concept of complementary managers who are responsible for specific asset categories and management styles in a diversified portfolio.

The CIF has a long-term investment horizon and recognizes that the successful management of the CIF is linked to global economic growth. Consistent with its fiduciary responsibilities, the CIF seeks to invest in managers and underlying assets that strive for long-term sustainability in their operations. As such, the Investment Committee will consider ESG factors which present material business risks or opportunities. ESG considerations will be integrated into investment decisions through investment manager due diligence conducted by the Investment Committee and the Investment Consultant.

ESG may encompass a wide range of factors, such as but not limited to:

- *Environmental*: how a fund or its investments performs as environmental stewards (energy efficiency, waste management, pollution, natural resource conservation, climate change, sustainability, water usage, consumer protection, biodiversity, deforestation, environmental risks, and treatment of animals)
- *Social*: how a fund or its investments manages relationships with employees, vendors, stakeholders and locales in which they operate (business relationships, vendors' values, ethics, philanthropy, employee engagement, community relations, volunteerism, labor standards/working conditions, employee health & safety, gender, diversity, equity & inclusion, human rights, customer satisfaction, data protection & privacy)
- *Governance*: how a fund and the entities in which it invests handles leadership, compensation, audits/audit committee structure, internal controls and investor rights (accurate and transparent accounting techniques, limited partner committee roles, conflict of interest policies, avoidance of corruption & other illegal practices, board composition, & proper government relations/lobbying & political contributions standards)

The Policy and its implementation shall be subject at all times to applicable law and to the fiduciary duties of the Board of Regents and Investment Committee, including without limitation the duty to manage and invest the assets solely in the interest of the University and for the exclusive benefit of providing financial benefits to the University.

Donor Directed Investments: The UNM Foundation's Gift Acceptance Committee will consider requests from donors who approach the Foundation with a desire to support the important work of UNM and express an interest in having their endowment or quasi-endowment gifts invested in a cause-related way. If the donor's gift is accepted, the Foundation's Investment Committee will strive to identify an appropriate endowment investment vehicle outside the CIF to meet the donor's concerns while ensuring that the University's goals, objectives and values are maintained. The restriction or designation of a particular donor shall not be imposed on any other gifts or endowment assets.

Previous donations invested within the CIF will not be considered for divestment from the CIF and reinvestment outside the CIF.

3. AUTHORITY AND RESPONSIBILITY

University of New Mexico Board of Regents

The Board of Regents shall review the performance of the Investment Committee and the CIF at least annually. The Board of Regents shall approve annually, along with the Board of Trustees:

- The Investment Policy and any changes thereto.
- The Development Funding Allocation basis point fee.
- The Investment Consultant and its fees.

University of New Mexico Foundation Board of Trustees

In accordance with the bylaws of the Foundation, the Board of Trustees shall appoint an Investment Committee. The Board of Trustees shall approve, along with the Board of Regents:

- The Investment Policy and any changes thereto.
- The Development Funding Allocation basis point fee.
- The Investment Consultant and its fees.

The Investment Committee

The Investment Committee has fiduciary responsibility for directing and monitoring the investment of the CIF, and is authorized to retain and solicit recommendations of qualified professionals including the CFO, Investment Consultant and Investment Managers.

The Investment Committee's responsibilities include:

- Recommending an Investment Consultant and the terms of the contract.
- Selecting an Investment Custodian and approving the terms of the contract.
- Approving all CIF investment decisions (investment purchases, redemptions, capital commitments, etc.).
- Monitoring the CIF investments based on the guidelines described in this policy, and for compliance with all laws, rules and regulations, including but not limited to the Management of Charitable Funds Act as implemented by the State of New Mexico from time to time.
- Developing an investment policy for approval by the Board of Trustees to include an asset allocation model taking into consideration the appropriate rates of return and risk for each asset class.
- Reviewing performance at both the manager and portfolio level on a periodic basis and, if necessary, instructing the CFO and/or the Investment Consultant to conduct additional due diligence on any investment manager/product.
- Rebalancing the CIF in accordance with the asset allocation ranges.
- Providing regular reports to the Board of Trustees and to the Board of Regents, including recommendations with respect to any suggested changes in investment policies.

The University of New Mexico Executive Vice President for Finance and Administration

The Executive Vice President for Finance and Administration serves as voting member of the Investment Committee. Additional responsibilities include:

- Certifying Strategic Priorities on behalf of the University President; and
- Certifying requests for direct investments in University Strategic Priorities for compliance with the CIF investment policy, prior to consideration by the Investment Committee.

The UNM Foundation's Chief Financial Officer

The UNM Foundation's CFO serves as an advisor to the Investment Committee, and shall assist the Investment Committee as needed in carrying out their responsibilities noted above. Additional responsibilities of the CFO include:

- Implementing Investment Committee decisions as directed;
- Working directly with the Investment Consultant as needed;
- Preparing an annual report on the CIF, including performance and allocation information important to the donor community;

- Coordinating agenda items with the Investment Committee Chair and scheduling meetings of the Investment Committee such that all important matters are brought to the Committee's attention in a timely fashion;
- Reviewing and executing, in consultation with legal counsel, all offering documents for new investment products approved by the Investment Committee; and
- Certifying requests for direct investments in University Strategic Priorities for compliance with the CIF investment policy, prior to consideration by the Investment Committee.

The Investment Consultant

The Investment Consultant is responsible for providing advice to the Investment Committee as follows:

- Reviewing the asset allocation as appropriate and no less than annually.
- Monitoring the portfolios to ensure that assets remain within the designated ranges as specified in the asset allocation models, and recommending appropriate actions to address situations outside the designated ranges.
- Providing written comments and recommendations on the Policy as needed, but on no less than an annual basis.
- Assisting in selecting, monitoring, and replacing investment managers and products.
- Monitoring the CIF investments based on the guidelines described in this policy
- Recommending appropriate benchmarks and peer groups with which to monitor selected investment managers.
- Providing written quarterly reports no less than quarterly to the Investment Committee on investment products and managers, including departures of key personnel, style drift, changes in investment process and any other matter requiring the Investment Committee's attention including a recommendation that an investment manager be retained or terminated.
- Disclosing any fee relationships with investment managers, advertisers, placement agents or other providers of service for the CIF.
- Presenting reports to the Board of Regents and the Board of Trustees as needed.
- Providing the Investment Committee with reports comparing investment performance and asset allocation with the NACUBO-Commonfund Study of Endowments; and
- Reviewing all offering documents for new investment products prior to submission to the CFO for signature.

The Investment Managers

Investment managers shall, subject to the note regarding commingled funds:

- Act as responsible fiduciaries in all matters involving their management of CIF assets and comply with all applicable laws, rules and regulations.
- Report all activity to the CFO and Investment Consultant on a timely basis as agreed, but in no event will such report be provided on less than a quarterly basis. Such reports shall include a comparison of performance with the agreed-upon benchmark, and might include details about the holdings and strategies of the applicable product.
- Vote, or cause to be voted, all proxies on securities held by the CIF.
- Provide CFO with copies of audited financial statements covering the investment product in a timely manner.
- Make presentations to the Investment Committee when and as requested.
- Maintain a strict adherence to the mandate under which they were engaged.

- Provide CFO and Investment Consultant with a written report within five business days of the following matters: (a) change in ownership or legal entity status; (b) change in key personnel, including a change in anyone on the product portfolio management team; (c) change in investment philosophy or style; (d) civil or criminal charges filed against the firm by a regulator.
- Disclose any fee relationship with the investment consultant, advertisers, placement agents or other providers of service for the CIF.

Commingled funds pool the monies of multiple investors. Investors have a direct ownership interest in the fund, not in the underlying securities of the fund. Examples include mutual funds, bank collective funds, hedge funds, limited partnerships, and other similar investment vehicles. Since the duties and responsibilities of a commingled fund investment manager are set forth in the fund's governing documents, the requirements for investment managers described here may not apply to such commingled funds. The investment consultant, investment committee, and/or legal counsel shall evaluate a commingled fund investment manager's duties and responsibilities to investors as set forth in the fund's governing documents and that evaluation should be a factor in the determination of the suitability of the investment for the CIF.

The Investment Custodian:

The Investment Custodian shall:

- Provide monthly reports detailing investment holdings and account transactions within **15** business days following the end of each month and an annual report summarizing the following within 15 business days following each fiscal year end.
- Establish and maintain an account(s) for each Investment Manager of the portfolio as requested by the CFO.
- Provide all normal custodial functions including security safekeeping, collection of income, settlement of trades, collection of proceeds of maturing securities, daily investment of uninvested cash, etc., effect trades, if applicable, manage securities lending program, if applicable.
- Prepare additional accounting reports as requested by the CFO or Investment Consultant.

4. PERFORMANCE MEASUREMENT AND REPORTING

Performance Measurement

The performance of the CIF will be reviewed at least annually to determine the continued feasibility of achieving the investment objectives and the appropriateness of the investment policy for achieving these objectives. In consideration of the CIF's goals and objectives, several standards will be utilized in evaluating investment performance as opposed to a single measure. These standards reflect several aspects of investment performance, including the specific objectives and the market indices used to measure the performance of individual Managers.

- **TOTAL FUND PERFORMANCE:** The total fund's performance should be compared to the CIF's return goal, to a portfolio benchmark consisting of a weighted average of the underlying asset class benchmarks, and to an acceptable comparable peer universe, over a market cycle or a three to five year period if shorter.
- **ASSET CLASS LEVEL PERFORMANCE:** Each asset class approved by the Investment Committee should be compared to a clearly defined and if possible investable benchmark that reflects the addressable universe in that specific asset class.

- **INVESTMENT MANAGER PERFORMANCE:** Each Investment Manager's performance should be compared to a clearly defined and if possible investable benchmark that reflects the addressable universe of that specific investment strategy.

5. CONFLICT OF INTEREST

All persons responsible for investment decisions or who are involved in the management of the Foundation or who are consulting to, or providing any advice whatsoever to the Investment Committee, shall disclose in writing at the beginning of any discussion or consideration by the Investment Committee, any relationships, material beneficial ownership, or other material interest(s) which the person has or may reasonably be expected to have, with respect to any investment issue under consideration. The Investment Committee will require such persons to remove themselves from the decision-making process.

Any members of the Investment Committee responsible for investment decisions or who are involved in the management of the Foundation shall refuse any remuneration, commission, gift, favor, service or benefit that might influence them in the discharge of their duties, except as disclosed in writing to and agreed upon in writing by the Investment Committee. The intent of this provision is to eliminate conflicts of interest between committee membership and the Foundation. Failure to disclose any material benefit shall be grounds for immediate removal from the Investment Committee. This provision shall not preclude the payment of ordinary fees and expenses to the Foundation's custodian(s), Investment Managers, or Investment Consultant in the course of their services on behalf of the Foundation.