



PO Box 1749
Halifax, Nova Scotia
B3J 3A5 Canada

MEMORANDUM

TO: Investment Policy Advisory Committee
FROM: Vicki Robertson, Deputy Treasurer
DATE: December 4, 2023
SUBJECT: **2023 Annual Investment Policy Review**

Background

The Halifax Regional Municipality Investment Policy (the 'Policy') requires that the Investment Policy Advisory Committee (the Committee) review the Policy annually.

Staff regularly conducts jurisdictional scans of investment policies and notes differences to the HRM Investment Policy (the "Policy") with a view to making improvements. This memo outlines the changes to the current Investment Policy staff have identified as part of the 2023 review.

Analysis

Sector weights

During a recent jurisdictional scan of investment policies, staff noted that the sector weight for financial institutions are set to 60% maximum or greater for Schedule 1 banks for those municipalities surveyed. The Policy currently limits Schedule 1 banks to 50% of the overall portfolio.

Staff believes that the liquidity offered by financial institutions over government instruments is appropriate for our investment requirements that are primarily short-term in nature. Exposure risk is managed by ensuring each counterparty with a credit rate of R-1 High does not exceed 20% of the overall portfolio, and counterparties with a credit rating of R-1 Mid do not exceed 15% of the overall portfolio. Therefore, staff maintains that raising the limit to 60% will not increase the risk to the portfolio; however, the change will allow additional options for liquid investments.

Eligible investments

The list of eligible investments in the Policy includes equities as well as a limit of 5% for corporations. Reviewing other investment policies made it clear that equities are generally not acceptable investments for other municipalities. Staff contends equities are not appropriate for our portfolio due to the inherent risk and is in fact incompatible with the Policy objective of capital preservation. Therefore, removal of equities as an eligible investment along with corporations as counterparties is consistent with the objectives of the Policy and with the investment policies of the reference municipalities.

Benchmark

Analysis of investment policies found in other Canadian municipalities showed a consistent pattern of using an average of the three-month Canadian T-bill yield over the reporting period (annually) to evaluate results. This instrument is generally accepted as a proxy for the no-risk rate-of-return and is appropriate for treasury investments where the funds should keep pace with inflation without undue risk. Incorporating the average of the three-month Canadian T-bill yield for will provide a single benchmark against which all investments can be evaluated and promotes prudent investment decisions.

IPAC meeting schedule

The mandate of the committee is to establish the investing framework as set out in the Policy, and to monitor investing operations. The current meeting schedule of IPAC has been set to quarterly to coincide with the reporting of the investment results; however, investing occurs semi-annually to coincide with the receipt of property taxes. The guidance provided by the Committee is best provided as investing season approaches. The quarterly investment report (Treasurer's Report) will still be provided to Committee members for their review and the staff report forwarded to the Audit and Finance Standing Committee.

Recommendation

Staff recommends the sector limits in the Policy be modified to increase the maximum portfolio limit of financial institutions to 60%. As noted, the risk of exposure to financial institutions is limited by maintaining the per issuer limits currently in place. The additional 10% maximum limit for financial institutions provides additional liquidity.

Staff further recommends removing both the investment instrument of equities and corporations as a counterparty. This is in addition to the following four counterparties removed from the prior annual review of 2022:

- i. CDP Financial Inc
- ii. Desjardins Group
- iii. Caisse Centrale Desjardins
- iv. OMERS Realty Corporation

Staff recommends the adoption of the average yield of the three-month Canadian T-bill as the benchmark for evaluating portfolio performance. This benchmark is a reasonable proxy for the no-risk rate-of-return and ensures the portfolio will not be devalued because of inflation.

Staff recommends the meeting schedule be changed to semi-annually from quarterly with the quarterly investment report (Treasurer's Report) provided for review quarterly.

Please refer to Appendix B for the draft amended Investment Policy based on these recommendations.

Supplemental Reference Material:

The following links are provided to the municipalities that were the focus of the jurisdictional scan when developing the recommendations herein.

1. City of Saint John Investment Management Policy Guidelines
[FAS - Investment Policy 2017.pdf \(saintjohn.ca\)](#)
2. City of Markham Investment Policy
[PROPOSED BUDGET LETTER \(markham.ca\)](#) (Reference Appendix 3 – page 392)
3. City of Burnaby Investment Report and Limits
[filestream.ashx \(escribemeetings.com\)](#) (Reference Attachment 1 – page 8)

Appendix A: Summary of Past Major Policy Amendments in Chronological Order*

Changes to Sector Weights	The Policy was updated for the maximum allowance for Schedule 1 financial institutions to increase from 25% to 50% of the total portfolio
Appendix of Definitions	Appendix A was added to the Policy, to include various definitions of investment terminology used throughout the Policy document
Policy Language & Objectives	Policy language for the objectives was split into two sections, going from six policy objectives to three objectives and three strategies
Changes to Sector Weights	To align with other municipalities, the sector weights for provincial counterparties and financial institutions were updated from a dollar value to a percentage.
Rebalance Frequency	The Policy was updated to state that there is a semi-annual rebalance of the portfolio, coinciding with the receipt of tax revenue.
Sector Weights Consolidations	Sector weights used to be listed for the municipality's Total Portfolio, Operating Fund, Capital Fund, Reserves, and Trust Funds. The Policy was updated to simplify Schedule A into one chart for the Total Portfolio, applying weights and minimum ratings to all portions of the portfolio.
Adding ESG considerations and clean up of counterparties	The policy was updated to monitor ESG ratings of the financial institutions on the counterparty list. Also removed some counterparties that had not been used for some time and for which ESG ratings are not available.

*Since 2007

Investment Policy

Approved by:

Regional Council
MMMM DD, 202X

Minister of Municipal Affairs
MMMM DD, 202X

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A. Terms of Reference

The Investment Policy Advisory Committee was created by Halifax Regional Municipality Council which is responsible for appointment of its members. Membership includes one member of Regional Council and one staff member who serve as Co-Chairs as well as volunteer members of the public. The volunteer members shall have a combination of finance and investment knowledge and relevant professional, business or educational experience.

The mandate of the Policy Committee includes establishing credit quality restrictions, recommending an appropriate set of guidelines, practices and procedures to guide the investment operations of the Halifax Regional Municipality (HRM), and monitoring same on an ongoing basis through periodic reports to Regional Council or any other body as directed by Regional Council.

B. Introduction

The Investment Policy of the Halifax Regional Municipality shall govern the investment of trust funds, reserve funds and surplus cash balances. Investments of the Halifax Regional Municipality Pension Plan are governed under a separate investment policy and are not addressed in this document. This Policy does not apply to loans permitted under the Municipal Government Act. Exceptions to this Policy shall be permitted from time to time upon approval by Regional Council and the Minister of Municipal Affairs.

The Investment Policy seeks to preserve and grow Halifax Regional Municipality revenues to fund both Operating and Capital Expenditures while adhering to strict legal requirements. Fundamental objectives of the Policy are built upon both preservation of capital and cash flow liquidity commensurate with HRM's expenditure requirements. For greater clarity, the vast majority of HRM investments shall be short term in nature as they exist only to provide a funding source for Operating and Capital Expenditures.

For the purpose of this policy, trust funds are funds which result from trust agreements through which the Municipality is accountable to third parties for the use and disposition of trust assets. In general these trusts are perpetual in nature with the majority of the income derived from the trust assets being used for the purpose of the trust and the principal being preserved.

Reserve funds are special purpose funds established through Provincial regulation or by motion of the Halifax Regional Municipality Council. Cash requirements are dependent on the purpose of the particular reserve fund. These requirements may be such that only a partial amount of a reserve may be expended in a given year which could allow for an investment time horizon spanning several years.

Surplus cash balances refer to the operating fund and capital fund. The operating fund pertains to the general operations of the Halifax Regional Municipality and the direct provision of services to its citizens. The investment time horizon for this fund would generally be short term in nature with some cash requirements daily while others are on bi-weekly and monthly cycles. The capital fund provides for expenditures on infrastructure and capital assets. Cash requirements would be driven by project expenditures that could span more than one year. Permanent funding of these project expenditures by cost sharing from other levels of government, debt, etc. may also be received over a number of years creating a requirement for bridge financing. This temporary financing is usually provided by operating fund cash flows and results in reduced liquidity and investment income for the operating fund.

Schedule A attached provides sector weights and investment quality restrictions for the portfolios anticipated above as well as for the total of all funds invested.

The Investment Policy of the Halifax Regional Municipality has been established on the basis of certain objectives which shall be adhered to in the investment of funds by or on behalf of the Halifax Regional Municipality.

The Policy Committee shall review the administration of the Investment Policy by the Halifax Regional Municipality staff responsible for on-going investment activities, as designated by the Treasurer. Such review shall focus on compliance with the specific investment objectives of the Policy and continued relevance of the Investment Policy itself. The Policy Committee shall submit reports to Regional Council or the body designated by Regional Council not less frequently than quarterly.

The Investment Policy shall be reviewed by the Policy Committee annually. Each annual review shall include the continued relevance of the Policy objectives as well as the strategies employed to meet the objectives in the context of evolving market conditions, experience in applying the Policy to actual decision making as well as the history of the Policy. In addition, staff periodically consult with other Municipalities with similar investment activities and bring to the Policy Committee best practices of these other Municipalities for consideration for inclusion in the HRM Investment Policy.

C. Investment Objectives

The three objectives of the Investment Policy, stated in order of priority of importance, are as follows:

1. Preservation of Capital
2. Liquidity
3. Competitive Returns on Investments

To accomplish these objectives a number of strategies will be used. These strategies include, but are not limited to, portfolio diversification, regular review of performance and various risk management practices such as limitations on the percentage of the portfolio that can be invested in any one sector or entity as shown in the attached Sector Weight Schedules.

The Policy Committee shall review the Investment Policy and monitor the administration of the Investment Policy. Policy amendments, as necessary, shall be presented to Regional Council upon recommendation of the Chief Administrative Officer. The Policy Committee shall approve investment asset mix parameters, establish credit quality restrictions, and recommend an appropriate set of guidelines, practices and procedures for the investment of funds by the Halifax Regional Municipality.

D. Investment Policy

The Treasurer shall be responsible for administering the investment activities of the Halifax Regional Municipality in accordance with the Investment Policy. The Treasurer shall recommend to the Policy Committee investment asset mix parameters and credit quality restrictions and shall develop and maintain appropriate procedures and controls for recording, reporting, and monitoring investments to ensure that investments are made in accordance with the Investment Policy. The Treasurer shall monitor investment performance and prepare reports not less frequently than quarterly for the Policy Committee and Regional Council or the body designated by Regional Council on performance and adherence to the Investment Policy.

Investments by or on behalf of the Halifax Regional Municipality shall be made in accordance with the objectives as discussed below.

The Sector Weight Schedules attached to this Policy should be used and interpreted in the context of the objectives of the Policy.

1. Preservation of Capital

Investment of public funds by or on behalf of the Halifax Regional Municipality shall be made in accordance with the objective of preserving and protecting the principal amount. Accordingly,

all investment opportunities shall be evaluated on the basis of risk of loss or diminution of capital. Investments which are determined to be inconsistent with the objective of preserving and protecting the principal amount are prohibited.

In assessing the degree of risk of an investment decision, greater relevant importance shall be given to the objective of preservation of capital than to the extent to which an investment provides for maintenance of necessary liquidity or a competitive return.

Investments which have been subject to a downgrade in their credit rating below the minimum level required by the Policy shall be converted to cash within a reasonable period of time, given prevailing market conditions.

2. Liquidity

Investment of public funds by or on behalf of the Halifax Regional Municipality shall be made in accordance with the objective of maintaining liquidity necessary in order to meet fluctuations in the cash flow requirements of the Halifax Regional Municipality.

The type and term of investments shall be determined by reviewing a forecast of the cash flow requirements of the Halifax Regional Municipality. The forecast of cash flow requirements will determine the proper proportion of investments that have terms to maturity which match the cash flow requirements of the Halifax Regional Municipality.

Approach: Staff of the Halifax Regional Municipality shall develop, not less frequently than monthly, forecasts of cash flow requirements based on revenue and expense projections.

Surplus and/or reserve funds not required for immediate or near-term expenses can be classified as follows:

- minimum cash balances
- temporary surpluses from operating funds
- longer term cash surpluses from reserve and trust funds

Investments: Efficient cash management results from a consideration of liquidity requirements and asset distribution within the parameters of preservation of capital, attainment of maximum return on investment, and diversification.

Funds not required for a specific short-term need can be invested in longer term securities; here, the most important consideration is the expectation of future interest rates and a reliable forecast of the timing of the need for these funds.

It is recognized that the Liquidity Objective may be satisfied by the sale of investments to selectively meet cash requirements as long as the sale does not result in a loss of capital.

3. Competitive Return on Investments

Investments by or on behalf of the Halifax Regional Municipality shall be made in accordance with the objective of obtaining a competitive return on investments and weighing investment

alternatives within the constraints of the policy objectives and subject to regular performance review. In evaluating the return on investments, performance of investments shall be measured against the risk-free rate of return, generally accepted to be the average yield of three-month Treasury bills on a one-year rolling basis.

An investment program can be implemented through in-house management where individual investments are placed by Halifax Regional Municipality staff or through the use of an external pooled fund vehicle whereby active management is delegated to an outside service provider. A combination of the above is also allowable.

In the context of in-house management competitive return also implies a bidding process for each investment to ensure that the best return available at a given time is selected under the constraints of Objectives 1 to 3.

In the context of the use of external management (i.e. pooled fund), competitive return implies the selection of a service provider based on historical performance, fee structure, stability of the organization, ability to satisfy the Investment Objectives and other aspects of the Investment Policy.

For a combined approach an optimal choice would be made based on the investment options available under the constraints of the Investment Policy.

E. Investment Strategies

1. Diversification of Investment Portfolio

Investment of public funds by or on behalf of the Halifax Regional Municipality shall be made in accordance with the objective of diversification of the investment portfolio in order to minimize risk and achieve optimal balance of risk and return.

The allocation and limitation of investments will be determined in accordance with the objective of diversification, using the following inter-related criteria:

- liquidity of investment
- credit rating of issuer
- maximum allocation by sector class (e.g. federal vs. provincial vs. municipal government issue / private sector)
- duration of investment (interest rate risk)

Foreign currency investments shall only be made to match foreign currency requirements to meet obligations payable in foreign currencies from time to time.

On the advice of the Treasurer, the Chief Administrative Officer shall recommend to Regional Council and or any body designated by Regional Council any changes to asset mix and the

minimum credit rating criteria applicable to each investment type, class, and sector. Schedule A contains recommended sector weights and minimum credit rating criteria for investments by the Halifax Regional Municipality. Schedule B contains a list of categories of investments in which the Halifax Regional Municipality may invest. Schedule C contains a list of entities in which the Halifax Regional Municipality may invest. This list may be amended on the recommendation of the Treasurer and the concurrence of the Policy Committee as long as any additions meet the credit quality restrictions of Schedule A.

HRM staff shall select investments based on the above criteria which shall be reviewed by the Policy Committee **not less frequently than semi-annually**.

Diversification involves the allocation of funds among various counterparties. There is an inherent cost associated with the movement of funds including wire fees and additional administrative overhead. To minimize this administrative overhead and cost while maintaining the diversification objective, the portfolio will be rebalanced semi-annually or at the discretion of the Treasurer or their delegate. Funds that are expected to be expended for operations prior to the next portfolio rebalance will be excluded from the calculation for the purpose of rebalancing and will be invested in an approved instrument that provides appropriate liquidity while maximizing the rate of return.

2. Regular Review of Performance

In order that a concise overview of the performance of investments may be gleaned by all stakeholders, all segments and the total investment portfolio shall operate within a sound system of regular measurement, reporting, review, and evaluation.

Performance of the portfolio shall be measured against appropriate external benchmarks as agreed to by the Policy Committee as well as the objectives of the Investment Policy taking into consideration the priority of each objective.

3. Risk Management Approach

As many of the aspects of the Investment Policy seek to address risk in its various forms, decisions that implement the Investment Policy must also be based on managing and balancing risks. Typical investment risks that can be managed are credit risk, liquidity risk and interest rate or market risk. It is also recognized that active management of risks does not guarantee particular outcomes.

There are also financial risks that are beyond the scope of this Investment Policy. For example, while Canadian Monetary Policy seeks a stable long term inflation rate of 2% which usually implies a short term interest rate structure above this inflation rate, there may be periods of time when interest rates may persist below the actual and desired rate of inflation. As a result the maintenance of a rate of return above the rate of inflation, although highly desirable, may not always be available given the constraints of the Investment Policy.

F. Valuation of Investments

Investments in publicly traded securities shall be recorded, by the custodian, on a mark to market basis and shall be reported to the Treasurer not less frequently than monthly.

Investment in pooled funds comprising publicly traded securities shall be valued according to the unit values published at least weekly by the pooled fund manager.

If a market valuation of the investment is not readily available, then a fair value shall be determined by the Treasurer in accordance with generally accepted accounting principles from time to time approved by the Canadian Institute of Chartered Accountants, or any successor institute, as published in the Handbook of the Canadian Institute of Chartered Accountants, or any successor publication. For each such non-traded investment, an estimate of fair value shall be supplied by the custodian no less frequently than monthly. In all cases, the methodology should be applied consistently over time.

Any Custodian acting on behalf of the Halifax Regional Municipality shall record the investments held by the Halifax Regional Municipality. The Custodian shall also record and receive any income from these investments as well as perform those other duties typically associated with a professional custodian.

G. Conflict of Interest

A conflict of interest occurs when any interested person may benefit materially from knowledge of, participation in, or by virtue of an investment decision.

An "interested person" includes:

- any employee of the Halifax Regional Municipality who is managing in-house portfolios or is involved in the investment of funds by the Halifax Regional Municipality
- any member of the Policy Committee, and
- any person related to any of the foregoing

Should a conflict of interest occur, the person who has a conflict of interest or any person who becomes aware of a conflict of interest situation, shall immediately disclose the conflict to the Treasurer. Any such party shall abstain from decision making with respect to the area of conflict, and a written record of the conflict shall be maintained by the Treasurer.

Interested persons 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.

The Code of Ethics and Standards of Professional Conduct adopted by the Chartered Financial Analysts (CFA) Institute shall be expected to apply to external investment managers.

SCHEDULE A

Sector Weights – Total Portfolio

	Maximum % or \$ of Portfolio Per Issuer	Maximum Allowable % of Portfolio Per Category	Minimum Credit Rating Required*
<u>CASH & EQUIVALENTS</u> (Treasury Bills, Banker's Acceptance, etc. under one year)		100%	
Federal Government & its Guarantees	100%	100%	N/A
Provincial Governments & their Guarantees	25%***	100%	R-1 Mid
Municipal Governments & their Guarantees	10%	25%	R-1 Mid
Schedule 1 Financial Institutions & their Guarantees	20% 15%	50 60%** 50 60%**	R-1 High R-1 Mid
Corporations	5%	5% **	R-1 High
<u>FIXED</u> (Bonds, etc. over one year)		20%	
Federal Government & its Guarantees	100%	100%	N/A
Provincial Governments & their Guarantees	25%***	100%	A
Municipal Governments & their Guarantees	10%	25%	AA
Schedule 1 Financial Institutions (1-5years)	20%	50%**	AA

The Maximum % or \$ of Portfolio Per Issuer and Maximum % of Portfolio Per Category refer to maximums at the time of placing an investment.

Investments in this Schedule are subject to the terms and conditions of this Investment Policy.

Investments denominated in foreign currency shall be limited to foreign currency requirements.

Total Portfolio refers to all invested funds prior to allocation to individual Funds. Risk exposure, through Maximum % or \$ of Portfolio Per Issuer, is managed at the Total Portfolio level.

* Rating agency as determined by the Investment Policy Advisory Committee from time to time.

** The Total Maximum Allowable for Schedule 1 Financial Institutions and their Guarantees and Corporations in total shall not exceed ~~50~~ 60%.

*** The Total Maximum Allowable exposure for individual Provinces and their Guarantees shall not exceed 25%.

SCHEDULE B

Eligible List of Investments

Investments by or on behalf of the Halifax Regional Municipality shall be made in accordance with the Investment Policy. The Halifax Regional Municipality may invest in the following asset categories:

- Banker's Acceptances
- Bearer Deposit Notes
- Canadian Treasury Bills
- Commercial Paper
- Municipal Promissory Notes
- Bank Subsidiary Paper
- Provincial Treasury Bills
- Term Deposits
- Guaranteed Investment Certificates
- CMHC Mortgage Backed Securities
- Federal, Provincial, Municipal Bonds and Debentures
- Corporate Bonds and Debentures
- ~~Equities~~

Any obligations unconditionally guaranteed by the federal government of Canada
Any obligations unconditionally guaranteed by a provincial government of Canada

SCHEDULE C

Eligible List of Counterparties (Investment Entities)

Investments by or on behalf of the Halifax Regional Municipality shall be made in accordance with the Investment Policy. The Halifax Regional Municipality may invest in the following entities:

The Government of Canada and its Guarantees:	
Federal Government	Business Development Bank
Canada Mortgage and Housing Corporation	Canadian Wheat Board
Export Development Canada	Farm Credit Corporation

Provincial Governments and their Guarantees:	
Province of Alberta and its Guarantees	Province of Ontario and its Guarantees
Province of British Columbia and its Guarantees	Province of Quebec and its Guarantees
Province of Manitoba and its Guarantees	Province of Saskatchewan and its Guarantees
Province of New Brunswick and its Guarantees	Province of Nova Scotia and its Guarantees

Municipal Governments and their Guarantees:
Municipality of Calgary and its Guarantees

Financial Institutions and their Guarantees (Schedule 1):	
Bank of Montreal and its Guarantees	Royal Bank of Canada and its Guarantees
Bank of Nova Scotia and its Guarantees	Toronto Dominion Bank and its Guarantees
National Bank of Canada	
Canadian Imperial Bank of Commerce and its Guarantees	

Appendix A

Definitions

Risk: The quantifiable likelihood of loss or less-than-expected returns. Examples: currency risk, inflation risk, principal risk, country risk, economic risk, mortgage risk, liquidity risk, market risk, opportunity risk, income risk, interest rate risk, prepayment risk, credit risk, unsystematic risk, call risk, business risk, counterparty risk, purchasing-power risk, event risk.

Principal Risk: The risk of losing the amount invested due to bankruptcy or default. There is always the possibility that through some set of circumstances, invested money will decrease or completely disappear. In this case, principal is lost, not just profits.

Liquidity Risk: The risk that arises from the difficulty of selling an asset. An investment may sometimes need to be sold quickly. Unfortunately, an insufficient secondary market may prevent the liquidation or limit the funds that can be generated from the asset. Some assets are highly liquid and have low liquidity risk (such as stock of a publicly traded company), while other assets are highly illiquid and have high liquidity risk (such as a house).

Furthermore, in the context of the HRM Investment Policy, Liquidity Risk also refers to the risk of not having sufficient funds available to meet financial obligations as they come due.

Market Risk: Risk which is common to an entire class of assets or liabilities. The value of investments may decline over a given time period simply because of economic changes or other events that impact large portions of the market. Asset allocation and diversification can protect against market risk because different portions of the market tend to underperform at different times.

Interest Rate Risk: The possibility of a reduction in the value of a security, especially a bond, resulting from a rise in interest rates. This risk can be reduced by diversifying the durations of the fixed-income investments that are held at a given time.

Preservation of Capital: A conservative investment strategy characterized by a desire to avoid risk of loss.

Liquidity: The ability of an asset to be converted into cash quickly and without any price discount.

Banker's Acceptance: A short-term credit investment which is created by a non-financial firm and whose payment is guaranteed by a bank. Often used in importing and exporting, and as a money market fund investment.

Treasury Bill: A negotiable debt obligation issued by a government and backed by its full faith and credit, having a maturity of one year or less.

Promissory Note: A document signed by a borrower promising to repay a loan under agreed-upon terms. also called note.

(Most of the definitions are from InvestorWords.com with some modifications to make them more relevant to the Investment Policy)