

# Management of Investments Policy

**This Policy replaces all previous policies related to this topic.**

## 1. Policy Purpose

- 1.1 The objective of this policy is to provide a framework for the investment of the Town's excess funds. While exercising the power to invest, consideration will be given to the following:
- a. Preservation of capital: Investment management is to be undertaken in a manner that seeks to ensure security and safeguarding the investment portfolio. This includes managing credit and interest rate risk where applicable within identified threshold and parameters.
  - b. Liquidity: There is to be sufficient liquidity to meet all reasonably anticipated cash flow requirements as and when they fall due without incurring significant costs due to the unanticipated sale of an investment.
  - c. Investment Return: Investments are expected to achieve a market average rate of return taking into account the Town's risk tolerance.

## 2. Policy Scope

- 2.1. This policy applies to all employees or other entities that invest funds on behalf of the Town.

## 3. Policy Principles

### Legislative Requirements

- 3.1 All investments are to comply with the following:
- a. Local Government Act 1995 Section 6.14
  - b. The Trustees Act 1962 Part III Investments
  - c. Local Government (Financial Management) Regulations 1996 Regulation 19 and 19C.
  - d. Australian Accounting Standards

### Prudent Person Standard

- 3.2 Investments will be managed with the care, diligence and skill that a prudent person will exercise. Officers are to manage the investment to safeguard the portfolios in accordance with the spirit of this Investment Policy, and not for speculative purposes.
- 3.3 The Local Government (Financial Management) Amendment Regulations 2017 specifically prohibits investment in a foreign currency.

### Approved investments

- 3.4 Investments are limited to:
- a. Interest Bearing term deposits with Authorised Deposit Taking Institutions (ADIs – Australian banks, building societies and credit unions) for a term not exceeding 12 months.

- b. Interest Bearing deposits with the Western Australian Treasury Corporation (WATC) for a term not exceeding 12 months.
- c. Bonds guaranteed by the Commonwealth Government or State or Territory for a term not exceeding 3 years.

The *Local Government (Financial Management) Amendment Regulations 1996* specifically prohibits investment in a foreign currency.

### Risk Management Guidelines

3.5 Investments obtained are to comply with three key criteria relating to:

- a. Portfolio Credit Framework: limit overall credit exposure of the portfolio.
- b. Counterparty Credit Framework: limit exposure to individual ADIs and government.
- c. Term to Maturity Framework: limits based upon maturity of investments.
- d. Overall Portfolio Limits

#### 3.5.1 Institution Credit Framework

Exposure to an individual ADI will be restricted by their credit rating so that single entity exposure is limited, as detailed in the table below:

S&P* Long Term Rating Category Applicable for Government Bonds Only Investments Overall	S&P Short Term Rating Category Applicable for ADI and WATC Only Investments	Portfolio Maximum Limit
AAA/AA	A-1	45%
	A-2	40%
	A-3 to Unrated ADI	10%

\*or Moody's/ Fitch equivalents.

If any of the Town's investments are downgraded such that they no longer fall within the investment policy category limits, they will be divested as soon as practicable.

#### 3.5.2 Term to Maturity Framework

The investment portfolio is to be invested within the following maturity constraints.

Overall Portfolio Term to Maturity		
Portfolio < 1 year	Min 30%	Max 100%
< 1 year <3 years	Min 0%	Max 70%

### Delegated Authorities

3.6 These acronyms are used in the below table:

- Chief Executive Officer (CEO)
- Director of Corporate and Community Services (DCCS)
- Director Engineering Services (DES)
- Director Development and Regulatory Services (DDRS)
- Finance Manager (FM)

Authority to conduct investment activities is delegated in line with the table below:

Activity	Authorising Officers	Amount
Investment decision:	Two of the following three:	\$0 to <\$2,000,000
Deposit withdrawal:	CEO, DCCS, DES, DDRS and FM.	

Decisions made in excess of these limits will be referred to Council.

### **Benchmarking**

- 3.7 The performance of the investment portfolio shall be measured against the UBS Warburg 90 day Bank Bill Index and/ or the Cash Rate.

### **Reporting and Review**

- 3.8 A monthly report will be provided to Council in support of the monthly statement of activity. The report will detail the investment portfolio in terms of performance, percentage exposure of total portfolio, maturity date and changes in market value.
- 3.9 Documentary evidence must be held for each investment and details thereof maintained in an Investment Register.
- 3.10 Certificates must be obtained from the financial institutions confirming the amounts of investments held on the Town's behalf as at 30 June each year and reconciled to the Investment Register.
- 3.11 This Policy will be reviewed at least every four years or as required in the event of legislative changes. Where, as a result of changes to legislation or the ability arises to invest to the advantage of the Town contrary to the provisions of this policy, the Chief Executive Officer may initiate such variations as deemed necessary subject to the submission of a report to the Council approving any variation to the Policy in advance.

## **4. Exemptions**

There are no exemptions to this policy.

## **Definitions**

- 4.1. *Prudent Person Standard* - Investment will be managed with the care, diligence and skill that a prudent person would exercise. Officers are to manage the investment to safeguard the portfolios in accordance with the spirit of this Investment Policy and funds are not to be used speculative purposes.

## **5. Legislation**

- 5.1. *Local Government Act 1995*
- 5.2. *The Trustees Act 1962* Part III Investments
- 5.3. Local Government (Financial Management) Regulations 1996 Regulation 19 and Regulation 19C
- 5.4. Australian Accounting Standards

## **6. Other Relevant Procedures / Key Documents**

- 6.1. Nil.

## 7. Appendix

## Appendix One – Standard and Poor’s Rating Description

<b>Council Policy Number:</b>	POL/95	<b>Council Adoption Date:</b>	24/04/2018
<b>Policy Area:</b>	Corporate Services - Community	<b>Version Number:</b>	V2
<b>Responsible Officer:</b>	Director Corporate and Community Services	<b>Amendment Dates:</b>	19/09/2023
		<b>Next Review Date:</b>	30/07/2027

<b>Reference:</b>	<i>Strategic Community Plan 2013-2023</i>	<i>Corp. Business Plan 2020-2024</i>
Priority Area: 1		Priority Area: 1
Major Strategy: 1.3		Actions: 1.4

## **MANAGEMENT OF INVESTMENTS POLICY**

### **APPENDIX ONE - STANDARD & POOR'S RATINGS DESCRIPTION**

#### **1. Standard & Poor's Ratings Description**

Standard & Poor's (S&P) is a professional organisation that provides analytical services. An S&P rating is an opinion of the general creditworthiness of an obligor with respect to particular debt security or other financial obligation — based on relevant risk factors.

Credit ratings are based, in varying degrees, on the following considerations:

- Likelihood of payment.
- Nature and provisions of the obligation.
- Protection afforded by, and relative position of, the obligation in the event of bankruptcy, reorganisation or other laws affecting creditors' rights.

The issue rating definitions are expressed in terms of default risk.

#### **2. Short Term Obligation Ratings**

##### **2.1. A-1**

This is the highest short-term category used by S&P. The obligor's capacity to meet its financial commitment on the obligation is strong. Within this category, certain obligations are designated with a plus sign (+). This indicates that the obligor's capacity to meet its financial commitment on these obligations is extremely strong.

##### **2.2. A-2**

A short-term obligation rated A-2 is somewhat more susceptible to the adverse effects of changes in circumstances and economic conditions than obligations in higher rating categories. However, the obligor's capacity to meet its financial commitment on the obligation is satisfactory.

##### **2.3. A-3**

A short-term obligation rated A-3 exhibits adequate protection parameters. However, adverse economic conditions or changing circumstances are more likely to lead to a weakened capacity of the obligor to meet its financial commitment on the obligation.

##### **2.4. Unrated**

Are not rated by S&P however the City's Investment Policy does allow limited investment in those ADIs that are supervised by the Australian Prudential Regulatory Authority (APRA).

### **3. Long Term Obligation Ratings**

#### **3.1. AAA**

An obligation/obligor rated AAA has the highest rating assigned by S&P. The obligor's capacity to meet its financial commitment on the obligation is extremely strong.

#### **3.2. AA**

An obligation/obligor rated AA differs from the highest rated obligations only in a small degree. The obligor's capacity to meet its financial commitment on the obligations is very strong.

#### **3.3. Plus (+) or Minus (-)**

The ratings from 'AA' to 'CCC' may be modified by the addition of a plus or minus sign to show relative standing within the major rating categories.

#### **3.4. CreditWatch**

CreditWatch highlights an emerging situation, which may materially affect the profile of a rated corporation and can be designed as positive, developing or negative.

Following a full review the rating may either be affirmed or changed in the direction indicated.

#### **3.5. Rating Outlook**

A Rating Outlook highlights an emerging situation, which may materially affect the profile of a rated corporation and can be designed as positive, developing or negative.

Following a full review the rating may either be affirmed or changed in the direction indicated.