



UTAH SCHOOL & INSTITUTIONAL TRUST FUNDS OFFICE

Investment Policy Statement

DECEMBER 2025

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INTRODUCTION

Authority and Beneficiaries

The Utah State Legislature created the School & Institutional Trust Funds Office (SITFO) as an independent agency within state government to manage trust assets with a clear fiduciary mandate. SITFO is governed by a five-member Board of Trustees (Board), chaired ex officio by the State Treasurer. The Board is composed of experienced investment professionals selected through a robust, statutorily defined process to ensure independence and accountability.

The purpose of SITFO is to invest Trust Lands Administration (TLA) revenues in a manner that sustains a perpetual distribution policy and preserves intergenerational equity among current and future beneficiaries. Trusts are managed for the sole benefit of their designated beneficiaries.

SITFO employs similar strategic asset allocations across trusts, reflecting shared long-term return and risk objectives. This unified approach enhances efficiency, governance consistency, and economies of scale. There is significant benefit for the smaller trusts to be invested alongside the permanent School Trust Fund, which accounts for 95% of combined assets. In addition to the School Trust Fund, there are 10 smaller institutional trust funds:

- Miners' Hospital
- Institute for the Blind
- Reservoirs Fund
- Normal School
- University of Utah
- School of Mines
- Utah State University
- Utah State Hospital
- Deaf School Fund
- State Industrial School

This investment policy is subject to all applicable state and national laws. Specific laws of the State of Utah for reference include:

- Utah Code Title 53D, Chapter 1
- State of Utah Constitution Article VI, Section 29 and Article X, Sections 5 and 7
- Utah Code 53C-3-102, 53F-9-201, 63G-6a-107, and 63E-1-102

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State of Utah, School and Institutional Trust Funds Office
(SITFO)



Purpose and Fiduciary Duty

The purpose of this investment policy statement (IPS) is to provide a clear framework to assist SITFO and its Board in the prudent supervision, monitoring, and evaluation of the investment of the trust assets. The IPS serves as both a governance tool and a repository of institutional knowledge, ensuring continuity of approach across market cycles and leadership transitions. SITFO staff and the Board review and evaluate the IPS periodically. This periodic review is designed to reaffirm adherence to policy, refine language for clarity, incorporate updates to investment processes or structures, and formalize any Board-approved amendments. Given SITFO’s long-term investment horizon, significant policy changes are not expected from year to year. However, the review process ensures the IPS remains current, relevant, and aligned with SITFO’s fiduciary duties and statutory mandate.

SITFO and its Board have a fiduciary responsibility to make investment decisions and take actions solely in the best interest of the beneficiaries. Fiduciaries must adhere to the highest standards of integrity, loyalty, and prudence, consistent with their duty to manage the trust assets for the exclusive benefit of current and future beneficiaries. Fiduciaries are required to provide full and fair disclosure of all material facts regarding any actual or potential conflicts of interest and must take appropriate measures to avoid or mitigate such conflicts. In pursuing the investment objectives set forth in this policy, the Board, staff, consultants, and investment managers shall exercise prudence, skill, and due care, in accordance with the prudent investor standard and other applicable fiduciary principles established under Utah law. All investment actions and decisions must be based solely on the interest of the beneficiaries. For additional guidance, SITFO and the Board have articulated their core investment beliefs in an accompanying document titled “Statement of Investment Beliefs.” These beliefs are foundational principles that inform judgement and decision-making but do not constitute policy, and therefore are not included within this IPS. The statutes governing SITFO’s structure, authority, and fiduciary obligations are referenced throughout this document and can be found in Utah Code Title [53-D-1 School and Institutional Trust Fund Management and Land Trusts Protection and Advocacy Office](#).



DUTIES AND RESPONSIBILITIES

Creation and Membership of the Board

The creation, structure, and membership of SITFO’s Board of Trustees are established under Utah Code §53D-1-301 and can be summarized as follows:

- The board consists of the State Treasurer, who serves as ex officio Chairperson, and four additional members as appointed by the State Treasurer.
- Appointments are made:
 - From a list of qualified candidates provided by the Nominating Committee,
 - On a non-partisan basis,
 - From individuals who possess demonstrated expertise in institutional investment management, and
 - For six-year staggered terms, ensuring continuity and preservation of institutional knowledge.

Trustee	Appointed	Re-Appointed	Term Expires
Chair Marlo Oaks	Ex-Officio	Ex-Officio	Ex-Officio
Vice-Chair Bong Choi	July 1, 2024	N/A	June 30, 2030
Rahki Patel	July 1, 2025	N/A	June 30, 2031
David Zucker	June 6, 2023	N/A	June 30, 2026
Mark Siddoway	July 1, 2023	N/A	June 30, 2029

Duties and Responsibilities of the Board

The Board is vested with the authority to establish investment policy for SITFO. The Board determines its own meeting schedule and convenes no fewer than four times per year to review, evaluate, and take action on matters of policy, performance, and governance.

The Board's primary responsibilities include, but are not limited to, the following:

- Periodically review and approve:
 - The strategic asset allocation and capital market assumptions.
 - The Investment Policy Statement.
 - The Statement of Investment Beliefs.
 - Changes to SITFO's operating budget, staffing and compensation, and operations.
 - The Director's performance, goals, and compensation.
- Annually review:
 - The underlying structure and implementation framework of each asset class.
- Quarterly review:
 - The investment performance and market value of each trust.
 - The asset class weights relative to the strategic target allocation and policy ranges.
 - Compliance with the Investment Policy Statement.
- Ongoing governance and oversight:
 - Maintain a comprehensive understanding of the investment process, including asset allocation, manager selection, and risk management practices.
 - Review the annual audit report and consult with the external auditor, as necessary, to address findings or recommendations.
 - Review and approve SITFO hiring or termination of consultants and custodian.
 - Review the distribution policy governing disbursements to beneficiaries.

Duties and Responsibilities of SITFO

SITFO staff is charged with the day-to-day management and oversight of the trust assets, operating under the strategic direction and policies established by the Board. Staff responsibilities include, but are not limited to, the following:

- Implementation, management and monitoring of the investments of each trust in accordance with the Risk Tolerance Guidelines and other parameters outlined in this IPS.
- Hiring and termination of investment managers as necessary to implement the approved strategic asset allocation and achieve the trusts' investment objectives.
- Execution of portfolio rebalancing transactions to maintain target allocations within approved ranges and ensure portfolio alignment with long-term strategy.
- Regularly review and monitor:
 - Total portfolio and asset class-level performance to assess the continued appropriateness of the strategic asset allocation, asset class structures, and investment managers.
 - Portfolio risk exposures in alignment with the Risk Tolerance Guidelines outlined in this IPS.
 - Capital market developments and emerging investment opportunities that may impact the trusts' risk-return profile.
 - Effectiveness and prudence of the securities lending program and other ancillary investment activities.
- Ensuring compliance with this Investment Policy Statement, applicable statutes, and all fiduciary standards governing SITFO's operations.



- Advise the Board on:
 - Broad investment objectives, beliefs, and policies, including risk management frameworks, strategic asset allocation, asset class structures, and risk tolerance guidelines.
 - Sufficiency of resources—financial, technological, and human—necessary to effectively conduct the agency’s affairs and fulfill its statutory responsibilities.
 - The appointment, evaluation, and effectiveness of key service providers including the custodian, investment consultant, and other external vendors essential to the management and administration of the trusts.
 - Development of Board meeting agendas, ensuring that materials are comprehensive, relevant, and distributed in advance to facilitate informed and efficient decision-making.

Duties and Responsibilities of the Investment Consultants

Investment Consultants may be retained to support the Board and SITFO staff in fulfilling their fiduciary duties. Investment Consultants serve in an advisory capacity and operate under the direction of SITFO staff and the Board, with responsibilities that include, but are not limited to, the following:

- Review and monitor:
 - Total portfolio and asset class level performance to ensure the continued appropriateness of the strategic asset allocation, asset class structures, and individual investment managers.
 - Portfolio risk exposures in alignment with the Risk Tolerance Guidelines outlined in this IPS.
 - Capital market developments and emerging investment opportunities that may impact the trusts’ risk-return profile.
- Recommend, coordinate, and advise SITFO staff and the Board on:
 - Broad investment objectives, beliefs, and policies, including risk management frameworks, , strategic asset allocation, asset class structures, and risk tolerance guidelines.
- Assist with any other investment, policy, or operational issues as requested by the Board.
- Prepare comprehensive due diligence monitoring and investment performance reports with respect to trust investments as requested by the Board of SITFO staff.
- Provide independent, research0based recommendations on portfolio positioning and potential adjustments in response to changes in market conditions and/or relative value.
- Assist with the implementation of investment decisions and support ongoing investment operations as requested.
- Provide appropriate education on investment, operational, and governance topics as necessary to strengthen fiduciary decision-making.
- Attend Board meetings and related sessions as requested to present analyses, discuss findings, and participate in strategic discussions.

Duties and Responsibilities of the Investment Managers



The duties and responsibilities of investment managers are defined and agreed upon in the legal governing documents executed prior to the investment of any trust assets. These documents outline the specific mandate, objectives, guidelines, and constraints applicable to each investment manager. In addition to those contractual terms, investment managers are expected to adhere to the following responsibilities:

- Manage the underlying assets in accordance with their stated investment mandate, this IPS, and other applicable guidelines provided by SITFO.
- Report investment results and meet with the Board, SITFO staff, and/or investment consultant as requested to review performance, strategy, and outlook.
- Promptly notify SITFO and its investment consultant of any material developments, including but not limited to organizational changes, investment team departures, ownership transitions, regulatory issues, or material deviations from the stated investment process.
- Exercise the care, skill, prudence, and due diligence that a prudent investment professional—acting in a like capacity and fully familiar with such matters—would use:
 - in like activities for like trusts with like aims and constraints;
 - in accordance and compliance with all applicable laws, rules, and regulations from local, state, federal, and international political entities;
 - as it pertains to fiduciary duties and responsibilities associated with the management of public trust assets.

Duties and Responsibilities of the Custodian (Custody Policy)

The custodian's primary function is to provide secure custody of SITFO's trust assets, including individual securities, commingled fund interests, and other investment holdings. The custodian acts as the fiduciary agent responsible for the safekeeping, settlement, accounting, and reporting of trust assets in accordance with governing agreements and applicable law. The custodian's responsibilities include, but are not limited to, the following:

- Provide safe custody over the assets of each trust, including appointment and oversight of qualified sub-custodians as needed to ensure global coverage and asset protection.
- Report to SITFO (no less frequently than annually) on all outstanding withholding tax reclaims, required global market documentation updates, and necessary power of attorney renewal related to proxy voting or other legal actions.
- Facilitate cash flows and transactions, including the provision of methods for secure delivery of authorized instructions, settlement of purchases and sales, temporary investment of uninvested cash, and the provision of foreign exchange services as required.
- Reconcile account positions and activity on an ongoing basis, including monthly reconciliation with separate account investment managers.
- Account for all portfolio transactions, ensuring the accurate collection and accrual of income such as interest and dividends.



- Maintain sub-accounting records to reflect various trust ownership interests within pooled investments.
- Provide comprehensive accounting, reporting, and other value-added services (with scope and fees, if any, subject to separate written agreements) including:
 - General Ledger Reporting Templates and Ledger Activity and Trial Balance Reports
 - ASC Topic 820 Fair Value Reporting Legal Determination Services
 - ASC Topic 820 Enhanced Fair Value Reporting / GASB 72 Level Determination Services including Documentation of Practical Expedient Application
 - Enhanced GASB Financial Reporting Services including drafting and tabular production for Financial Statement Footnotes
- Administer the Securities Lending Program in accordance with SITFO's Securities Lending Policy and the Securities Lending Authorization Agreement, ensuring appropriate risk management, transparency, and compliance.

STATEMENT OF RETURN AND RISK OBJECTIVES

SITFO does not target a specific quantitative risk level. Rather, it seeks to minimize volatility to the extent practicable while still achieving the long-term return objective. See Risk Tolerance Guidelines contained within this IPS.

The return and risk objectives serve as the foundational principles of the asset allocation process and are directly incorporated into its construction and periodic review. Asset allocation decisions are made with explicit reference to SITFO's risk tolerance, return expectations, and long-term fiduciary obligations.

SITFO's long-term investment objective is to achieve a total return of Consumer Price Index (CPI) + 5% over full market cycles. The primary return objective is to preserve and enhance the purchasing power of the trusts while sustaining an annual distribution of up to 5% of the current market value of the trusts, as defined the Distribution Policy contained in this IPS.

DISTRIBUTION POLICY

The School Trust Fund shall make an annual distribution based on the formula prescribed in Utah Code Section 53F-9-201. The calculation is designed to provide a stable, inflation-adjusted distribution while preserving the long-term purchasing power of the fund. The details of the formula are as follows:

1. "Annual distribution calculation" means, for a given fiscal year, the average of:
 - (a) 5% of the average market value of the State School Fund for that fiscal year; and
 - (b) the distribution amount for the prior fiscal year, multiplied by the sum of:
 - (i) one;
 - (ii) the percent change in student enrollment from the school year two years prior to the prior school year; and
 - (iii) the actual total percent change of the consumer price index during the last 12 months as measured in June of the prior fiscal year.
2. "Average market value of the State School Fund" means the results of a calculation completed by the SITFO director each fiscal year that averages the value of the State School Fund for the past 20 consecutive quarters ending in the prior fiscal year.
3. "Consumer price index" means the Consumer Price Index for All Urban Consumers: All Items Less Food & Energy, as published by the Bureau of Labor Statistics of the United States Department of Labor.
4. "SITFO director" means the director of the School and Institutional Trust Fund Office appointed under Section 53D-1-401.
5. "State School Fund investment earnings distribution amount" or "distribution amount" means, for a fiscal year, the lesser of:
 - (a) the annual distribution calculation; or
 - (b) 5% of the average market value of the State School Fund.

The other 10 trusts will make an annual distribution based on the formula outlined in Utah Code Section 53C-3-102(7):

“Distributions to the respective institutions from the associated permanent funds created from lands granted in Sections 8 and 12 of the Utah Enabling Act shall consist of 5% of the average market value of each institutional permanent fund over the past 20 consecutive quarters.”



ASSET ALLOCATION

The long-term strategic asset allocation (SAA) is the principal driver of portfolio risk and return and serves as the foundation for achieving the trusts' investment objectives. The SAA establishes the target exposures across asset classes and is designed to produce an expected total return equal to or greater than the trusts' long-term investment objective, while maintaining prudent diversification and risk control. SITFO evaluates the effectiveness of the SAA over a full market or business cycle, recognizing that short-term market fluctuations are not an appropriate measure of strategic success. The asset allocation process seeks to avoid undue concentration in any single asset class, sector, or factor exposure, thereby enhancing the portfolio resilience under a wide range of market and economic conditions.

Time Horizon

SITFO's investment time horizon is theoretically infinite, as the trusts are expected to be invested and managed in perpetuity for the benefit of current and future beneficiaries. This long-term perspective is a defining element of SITFO's investment philosophy and exerts significant influence on all strategic and tactical decisions. A long-term horizon allows SITFO to tolerate short-term volatility, capture illiquidity premiums, and invest opportunistically across market cycles, consistent with its fiduciary duty to preserve and enhance the trusts' purchasing power over generations.

Portfolio Rebalancing

The portfolio is governed by the strategic asset allocation weights and the maximum/minimum allocation constraints established in the Strategic Asset Allocation Table within the Risk Tolerance Guidelines section of this IPS. Allocations are monitored by SITFO and the consultant on a regular basis and reported to the Board at least quarterly. The board relies on SITFO to initiate and execute rebalancing actions consistent with the approved allocation ranges, risk guidelines, and prevailing liquidity conditions.

At any point in time, the actual asset mix may diverge from target allocations due to market fluctuations, cash contributions, capital calls and distributions, or other operational factors. The role of the allocation constraints and risk guidelines is to accommodate these short-term variations while maintaining



discipline around the approved long-term strategic targets. These parameters also define the permissible limits for tactical deviations, intentional or otherwise, from the approved asset allocation and benchmarks. Such flexibility enables SITFO to respond to market conditions in a controlled and transparent manner, while avoiding excess turnover or unintended risk exposures. The Board reviews asset allocations relative to strategic benchmarks each quarter and assesses the portfolio's adherence to the IPS, rebalancing policies, and overall risk posture.

RISK TOLERANCE GUIDELINES

The Risk Tolerance Guidelines establish the boundaries of investment risk that the Board authorizes SITFO to assume in pursuit of the trusts' long-term investment objectives. These guidelines define the framework within which SITFO exercises discretion to implement the strategic asset allocation and to manage the portfolio in alignment with its risk and return objectives.

SITFO and the Board recognize the inherent challenge of achieving the investment objective within complex and uncertain global investment markets. Accordingly, SITFO's approach to risk management is grounded in quantitative and qualitative portfolio analysis, ensuring that the portfolio's capacity to withstand volatility, illiquidity, and adverse market conditions is continuously assessed and managed within the authorized risk parameters.

Volatility

In alignment with SITFO's commitment to appropriate diversification and prudent risk management, the portfolio's overall volatility is expected to be less than that of a reference portfolio comprised of 70% MSCI All Country World Index (ACWI) and 30% Bloomberg U.S. Aggregate Bond Index.

Liquidity

Given SITFO's long-term investment horizon and the size and predictability of annual distributions, the portfolio can prudently tolerate a considerable level of illiquidity to support higher expected returns and to further enhance diversification efforts. Accordingly, SITFO maintains a disciplined balance between investment goals and liquidity requirements, ensuring that sufficient liquid reserves are available across a range of market environments. SITFO and the Board periodically review the portfolio's liquidity position to confirm that it remains consistent with both short- and long-term objectives and overall Strategic Asset Allocation (SAA). At the time of investment, the following limits apply:

- At least 15% of the total portfolio shall be available for redemption on at least a weekly basis.
- Further constraints on illiquidity are defined by the SAA targets and its ranges defined in this IPS.

Strategic Asset Allocation Benchmark

SITFO evaluates its performance relative to a strategic asset allocation benchmark designed to reflect the strategic asset allocation using best efforts. Where possible, each asset class is benchmarked to a publicly available, investable index that best represents its intended market exposure and underlying



factor risks. For asset classes in which no suitable public benchmark exists, SITFO constructs benchmarks using appropriate peer groups to ensure meaningful comparison. The specific benchmarks and their construction methodology are detailed in the table below.

During periods of transition— the Strategic Asset Allocation Benchmark shall be temporarily replaced by the Interim Benchmark. The Interim Benchmark reflects the portfolio’s actual investable opportunity set and provides an appropriate reference for evaluating performance during the transition phase.

Strategic Asset Allocation Table

Level	Asset Class	Min	Target	Max	Benchmark
2	Growth	40%	45%	50%	Composite of Public & Private, Pro Rata
3	Public Equity	19%	25%	30%	MSCI ACWI IMI
3	Private Equity	15%	20%	26%	Hamilton Lane Private Equity Composite
2	Real Assets	10%	15%	20%	Composite of Public & Private, Pro Rata
3	Public Real Assets	0%	5%	8%	S&P Real Assets Equity Index
3	Private Real Assets	7%	10%	15%	Hamilton Lane Private Real Assets Composite
2	Income	25%	30%	35%	Composite of Public & Private, Pro Rata
3	Public Income	15%	20%	23%	U.S. High Yield 1-3 Years Index
3	Private Income	7%	10%	15%	Hamilton Lane Private Credit Composite
2	Defensive	5%	10%	15%	Composite, Pro Rata
3	Duration	0%	3%	6%	Bloomberg 20-30 Year STRIP
3	Convexity	3%	7%	11%	HFRI Macro Index
3	Cash	0%	0%	3%	3 Mo U.S. T-Bill
1	Total Portfolio		100%		

Interim Benchmark

SITFO recognizes that it may take considerable time to fully implement the SAA, particularly as the portfolio increases its exposure to private markets and pursues greater diversification across asset classes and strategies,

During this transitional period, the Board authorizes the use of an Interim Benchmark, which reflects the portfolio’s evolving composition. The Interim Benchmark’s allocation weights are incrementally adjusted toward the Board-approved SAA policy weights as new investments are made and capital commitments are deployed. Specifically, each quarter, the allocation weight of any approved GRID category or asset class that has not been fully implemented shall be adjusted, towards the target, in 0.25% increments based upon invested capital. These increased allocation weights are offset with a commensurate pro-rata change in allocation weights for the other asset classes within the GRID category framework.

Once the portfolio has achieved the target asset allocation defined in the SAA, the Interim Benchmark will be replaced by the Strategic Asset Allocation Benchmark. At that point, performance measurement

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and reporting will reference the SAA Benchmark as the primary standard for evaluating total portfolio results.

Position Sizing

SITFO pursues diversification with the intent to minimize the risk of significant investment losses at the total portfolio level. Consequently, the total portfolio is constructed and maintained to provide prudent diversification with respect to the concentration of holdings in individual strategies, managers, sectors, or securities. Capital is deployed in tranches, whenever practicable, to mitigate market-timing risk and to facilitate cost-effective entry into positions over time. To ensure proper concentration control and risk management, the following position-sizing limits apply:

- No single investment shall represent more than 5% of the total portfolio at the time of initial investment, except in circumstances involving a transition of or exchange between managers or vehicles pursuing a substantially similar strategy and/or style.
- No active investment manager shall represent more than 10% of the total portfolio at market value at any time.

These limits are designed to maintain diversification, mitigate idiosyncratic manager risk, and preserve portfolio flexibility while allow for scale where appropriate.

REPORTING & COMMUNICATION

Executive Summary – Performance and Risk

The Board will periodically receive a performance and risk report summarizing performance, attribution, and the portfolio’s primary risk exposures and compliance with the IPS. The objective of this dashboard report is to provide clear and timely insight for the Board into the overall level of portfolio risk profile, both in absolute terms and relative to the benchmark, as well as the primary portfolio risk sensitivities. The report may include, but is not limited to, the following metrics and analyses:

- **Tracking Error (TE)** – measures deviation of actual portfolio returns from benchmark returns.
- **Value at Risk (VaR)** – estimates the potential loss under normal market conditions over a defined time horizon.
- **Equity Beta** – quantifies the portfolio’s sensitivity to global equity markets.
- **Interest Rate Beta / Duration** – measures sensitivity to interest rate movements.
- **Scenario and, Stress Test** – evaluates potential portfolio impact under various macroeconomic or market shock scenarios.
- **Currency and Geographic Exposures** – provides transparency into non-U.S. market and FX risk.

Performance Measurement and Portfolio Reporting

The consultant, custodian, or other independent third party will provide the Board comprehensive quarterly performance reports sufficient to monitor, measure, and analyze the portfolio’s performance, risk profile, and asset allocation. These reports serve as a primary mechanism of transparency and accountability, enabling the Board to assess progress toward meeting the portfolio’s investment objectives and adherence to the IPS. SITFO expects to achieve its investment objective over the long term, not each year. The Board recognizes that over shorter periods, the portfolio may outperform or underperform its benchmarks and peer groups due to market conditions, implementation timing, or investment strategy. Performance should therefore be evaluated within the context of the portfolio’s long-term objectives, investment horizon, and risk posture rather than on short-term fluctuations.

Asset Class Structure Reporting

To support the Board in its oversight and portfolio monitoring responsibilities, SITFO staff and the investment consultant will prepare Asset Class Structure Reviews that define the philosophy, objectives, and implementation of each GRID category and its respective asset classes. These reports provide transparency into how each portion of the portfolio contributes to the overall investment objectives and risk management framework. Asset Class Structure Reports will be reviewed quarterly on a rotating basis by GRID category to ensure ongoing evaluation of design, implementation, and performance alignment. Asset Class Structure Reviews will include the investment philosophy and objectives, role within the total portfolio, implementation approach, expected risk and return characteristics and any material changes or recommendations.