

Retirement Board

Timothy M. Ross
Chair
Yolanda T. King
Vice Chair

Dawn E. Huckaby
Todd H. Ingalsbee
Norma Santoyo
Mark Stevens
Brian A. Wallace



Executive Staff

Tina Leiss
Executive Officer

Kabrina Feser
Operations Officer

Steve Edmundson
Chief Investment
Officer

PERS' FUND

INVESTMENT OBJECTIVES & POLICIES

Amended by the Retirement Board
June 16, 2022

I. MISSION

It is the mission of the Public Employees' Retirement System (System) to:

- Provide public workers and their dependents with a retirement program that provides a reasonable base income for retirement or for periods where a disability has removed a worker's earning capacity.
- Encourage those workers to enter into and remain in government service for such periods of time to give public employers and the people of the State of Nevada the full benefit of their training and experience.

The investment program is to be managed for the exclusive benefit of the System's members and beneficiaries and support the actuarial funding and investment objectives of the System within the framework of the Nevada Revised Statutes, System policies and directives adopted by the Public Employees' Retirement Board (Board).

The purpose of this document is to define the Board's investment objectives and policies and to delineate the duties and responsibilities of the entities involved in the investment process.

II. OBJECTIVE

It is the investment objective of the System to:

- Generate a 7.25% long-term annualized return with the least possible volatility by producing a long-term total return from investments which exceeds the rate of inflation (CPI) by 4.75% by capturing market returns within each asset class;
- Invest so that the short-term volatility of returns will not cause the System to alter its long-term strategy; and
- Structure a simple investment program to control the ability to meet long-term return and risk objectives.

III. INVESTMENT PHILOSOPHY

Maintain consistent exposure to capital markets and systematically buy assets low and sell them high. To implement this strategy, we emphasize a simple, low cost structure that relies primarily on intelligent asset allocation and rebalancing.

- **Consistently Apply Time Tested Investment Principles**
 - Focus on the long term
 - Maintain consistent exposure to the capital markets
 - Adhere to disciplined rebalancing process
 - Broadly diversify
 - Implement changes intelligently – act from a position of strength
 - Align strategy with risk tolerance and goals
 - Emphasize an uncomplicated structure
 - Keep costs low

- **Implementation**
 - Primary focus on asset allocation
 - Make asset allocation changes at opportunistic points in the market cycle
 - Emphasize index management
 - Adhere to an intelligent, disciplined rebalancing process
 - Utilize fewer portfolios/managers
 - Keep manager and asset turnover low
 - Emphasize higher quality assets

IV. POLICIES

A. Board:

1. Each member of the Board shall discharge duties with respect to the fund solely in the interest of the member and benefit recipients, and with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims.
2. The Board shall:
 - a. Make investment decisions recognizing the System's funding requirements and in accordance with these Investment Objectives and Policies or adopt necessary revisions;
 - b. Employ Investment Consultant (Consultant) and Investment Counsel (Counsel) services as well as Investment Staff (Staff), to ensure that the System's funds are invested effectively and with proper risk control;
 - c. Issue Interim Directives that provide for the dispersal of funds;
 - d. Enter into written agreements covering performance expectations with Staff, Consultant, and Counsel; and
3. Formally review the System's Investment Objectives and Policies at least annually.
4. The Board and its individual members are not liable for investment decisions made by Counsel if they obtain qualified Counsel, establish proper Investment Objectives and Policies, issue appropriate Interim Directives, and monitor Counsel.

B. The System's Staff shall:

1. Provide advice and recommendations to the Board on all investment matters and discharge their investment duties solely in the interest of the members and benefit recipients with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims.
2. Make sufficient information available so that Board members can reasonably be expected to make prudent investment policy decisions.
3. Prepare necessary revisions to Investment Objectives and Policies, Investment Plans, Interim Directives, and other operating guidelines for Board consideration and adoption and effectively implement the Policies, Plans and Directives.
4. Ensure that monitoring programs, including performance reporting that incorporates the Global Investment Performance Standards where appropriate, are in place in order to adequately inform the Board.
5. Review asset allocation annually.

C. Consultants and Counsel:

1. Consultants and Counsel are fiduciaries and shall discharge their duties with respect to this fund solely in the interest of the members and benefit recipients with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims.
2. Counsel shall be liable for any investment decision that is not made in accordance with Investment Objectives and Policies and applicable Interim Directives established by the Board.
3. Qualified Consultants include those professionals with the background, expertise, and demonstrated success as institutional investment consultants for at least ten years, and research/database access, to provide investment program advice, including selection of qualified Counsel.
4. Qualified Counsel includes SEC registered investment advisors, banks, or insurance companies recognized by the System's Consultant and the Board as providing investment expertise with demonstrated success for at least the prior five years.
5. The Board's hiring process shall include directing Staff and Consultant to:
 - a. Screen manager profiles which shall include, but not be limited to:
 - i. Investment style/process
 - ii. Return/risk criteria
 - iii. Assets under management
 - iv. Organization/personnel
 - v. Trading capabilities

- b. Staff shall meet with semi-finalists and recommend finalists for consideration by the Board.
 - c. The Board shall review Staff's written recommendations in a public meeting and take action as they deem appropriate.
6. Staff and Consultant shall provide evaluations to the Board at any time it is not likely that Counsel will achieve the System's performance objectives. The Board shall then take action which may include, but not be limited to, more frequent special reporting, on-site staff reviews, or termination. Prior to termination, Staff shall notify the custodian of potential action. Upon termination Staff shall notify the custodian as soon as possible to sever account trading authority as appropriate.
7. No more than 10% of the System's publicly traded assets shall be managed on a permanent basis by a single investment firm in active strategies. A single firm may manage up to 30% of the System's assets on a permanent basis in index strategies. No asset manager may oversee more than 30% of the System's assets on a permanent basis in index strategies. The System's assets shall not permanently constitute more than 20% of any firm's assets within the asset class (equity, bonds, real estate, or private equity) managed for the System. Staff shall provide an annual report to the Board of assets under management consistent with this policy.
8. Staff shall provide a report to the Board of investment costs including management fees and commission costs annually.
9. Securities and foreign exchange transactions are considered by the Board to be investment decisions. As such, they will be carried out at the discretion of Counsel for the benefit of the System with brokers and dealers qualified to execute institutional orders on an ongoing basis at the best net cost to the System. Any commission arrangements (including commission recapture) are to be between the broker and Counsel. No person engaged in business as a broker or dealer in securities or who has a direct pecuniary interest in any such business who receives commissions for transactions performed as agent for the Board is eligible for employment as investment counsel for the Board. Counsel will select brokers based on:
 - a. Execution capability;
 - b. Transaction size/execution difficulty;
 - c. Research services;
 - d. Institutional experience/firm infrastructure; and
 - e. Commission rates.

Counsel and/or Custodian Bank shall annually provide a written report of brokerage activity which Staff will summarize and submit to the Board in the annual investment cost report. The report shall include:

Bonds- Total transactions detailed by brokerage firm.

Equities- Total transaction and commission activity, including commissions per share, and commissions as a percent of total, detailed by brokerage firm.

Foreign Exchange- Total transactions detailed by brokerage firm

For any soft dollar arrangements used provide the following:

- A description of goods and services obtained.
 - How the goods and services directly benefited the System.
 - Names of applicable brokers.
 - The total costs.
 - The percentage cost paid by the System.
 - Whether the same goods and services are available for purchase with hard dollars.
10. All investment transaction decisions shall be made by qualified Counsel.
 11. Proxy voting is considered by the Board to be a component of the investment decision process, therefore, Counsel is responsible for voting all proxies in a manner consistent with the best economic interest of the System. Counsel shall provide an annual report of proxy votes to Staff.
 12. In the event of a change in a security's characteristics such that it is no longer compliant with the System's policies, the security shall be liquidated within 90 days of the date of the change. Counsel shall notify Staff of policy violations as soon as possible. Staff will notify the Board of any individual security violation in excess of \$20 million and in the portfolio for more than 90 days.
 13. The System's assets must not be loaned to the State of Nevada or invested to purchase any obligations of the State.
 14. The System shall monitor security class action lawsuit settlements and file as necessary to ensure PERS receives damages to which it is entitled, unless PERS' investment Counsel deems another course of action is in the best financial interest of the System. Monitoring, filing and collection of domestic class action proceeds shall be coordinated by the System's Custodian Bank.
 15. Nevada Attorney General Opinion dated August 18, 2008, states: *Article 9, § 2 of the Nevada Constitution is clear and unambiguous and its meaning is plain. The trust fund monies in the PERS Fund "must never be used for any other purposes." There are no exceptions contained within this language. Any attempt to legislate or impose a social purpose in the PERS Fund investments is prohibited by the plain language of Article 9, § 2.3 PERS Fund investment must not become influenced by political or social issues, as its only purpose is to fund the members' retirement through prudent investing.*

V. ASSET ALLOCATION

A. Asset allocation shall be as follows:

	Target	Liquid Asset Target	Liquid Asset Rebalance Trigger
U.S. Equity	42%	47.7%	45.3% – 52.4%
International Equity	18%	20.5%	18.6% – 22.9%
U.S. Bonds	28%	31.8%	26.8%
Private Markets	12%		

1. The Private Markets allocation Target will be permitted to operate within a range of 8% and 16% during a market cycle.

- a. The private equity target allocation is 6% of the total fund assets, with an allocation range tolerance between 4% and 8% of total fund assets.
- b. The private real estate target allocation is 6% of the total fund assets, with an allocation range tolerance between 4% and 8% of total fund assets.
- c. Staff will notify the Board should either the Private Equity allocation or the Private Real Estate allocation breach their respective policy ranges.

Assets shall be rebalanced only if the liquid asset allocation reaches the rebalance trigger. When a trigger is hit, asset classes shall be brought all the way back to the liquid asset allocation target. The funding source/destination shall be those asset classes that are the farthest from their policy target.

The total fund market objective shall be comprised of market index returns (as defined in Section VI below for each asset class) weighted consistent with the above allocations.

- B. Asset class investments shall be consistent with the following targets.
1. Stocks
 - a. U.S. Stocks shall be invested in 100% S & P 500 Index
 - b. International Stocks shall be invested in 100% MSCI World ex USA Index
 2. Bonds
 - a. U.S. Bonds shall be invested in 100% Bloomberg U.S. Treasury Index
 3. Private Markets
 - a. The targeted allocation within Private Markets is:
 - 50% Core Private U.S. Real Estate
 - 50% Private Equity

VI. OBJECTIVES & POLICIES BY INVESTMENT CATEGORY

A. Short-term Investments:

1. The objective of short-term investments is to produce a return that equates to prevailing short-term rates applicable to the quality specified below.
2. All monies not deployed in permanent investments shall be invested in short-term investment vehicles as provided below.
3. Money market instruments shall include:
 - a. Direct obligations of the U. S. Treasury including bills, notes, and bonds, and repurchase agreements secured by those obligations.

- b. U.S. Treasury money market mutual funds that are SEC registered 2(a)-7 and AAA rated by at least two of Moody's, Standard and Poor's or Fitch and whose investment guidelines are substantially equivalent to and consistent with the System's overall short-term investment criteria.

B. Bonds:

1. The investment objective of the U.S. Bond portfolio is to produce a total return (time weighted rate of return), after fees, which captures the return of the Bloomberg U.S. Treasury Index with commensurate volatility.
2. The following dollar denominated securities are authorized:
 - a. Direct Obligations of the U.S. Treasury, including bills, notes, and bonds, and repurchase agreements secured by those obligations.
3. Short selling and the use of leverage are not permitted.

C. Stocks:

1. The investment objective of the U.S. Stock portfolio is to produce a total return (time-weighted rate of return), after fees, which captures the return of the Standard and Poor's 500 Common Stock Index with commensurate volatility.
2. The investment objective of the International Stock portfolio is to produce a total return (time-weighted rate of return), after fees, which captures the return of the Morgan Stanley Capital International World ex USA (MSCI World ex USA) Index (unhedged) with commensurate volatility.
3. Counsel with U.S. mandates are authorized to invest in the following securities:
 - a. All securities within the S&P 500 Index. All securities that have been publicly announced for inclusion in the S&P 500 Index. Counsel is permitted to hold a security that has been removed from the S&P 500 Index up to a maximum holding limit of 10 business days.
 - b. Counsel is permitted to purchase/sell the appropriate Exchange Traded Fund index tracking security (ETF) to maintain exposure to the index for the purpose of managing cash.
 - c. Short selling and the use of leverage are not permitted.
4. Counsel with international mandates are authorized to invest in the following securities:
 - a. All securities within the MSCI World ex USA Index. Counsel is permitted to hold a security that has been removed from the MSCI World ex USA Index up to a maximum holding limit of 10 business days.
 - b. American Depositary Receipts (ADR) when appropriate locally domiciled security is suboptimal and Foreign currency deposits (non-USD securities) in countries in the MSCI World ex USA Index.
 - c. Short selling and the use of leverage are not permitted.

- d. Counsel is permitted to purchase/sell the appropriate Exchange Traded Fund index tracking security (ETF) to maintain exposure to the index for the purpose of managing cash.

D. Private Markets:

The investment objective of the private markets portfolio is to produce a total return (time-weighted rate of return), which captures the blended return (based on the System's actual allocation) of the NCREIF (National Council of Real Estate Investment Fiduciaries) Index less 0.75% per year and S&P 500 Index +3% per year over rolling 10 year periods with commensurate volatility.

1. Private Real Estate:

- a. The investment objective of the U.S. real estate portfolio is to produce a total return (time weighted rate of return), which captures the return of the NCREIF (National Council of Real Estate Investment Fiduciaries) Property Index less 0.75% per year net of fees, over rolling 10-year periods with commensurate volatility (as measured by standard deviation). Net investment income shall exceed two-thirds of total return over rolling 10-year periods. The private real estate target allocation is 6% of the total fund assets, with an allocation range tolerance between 4% and 8% of total fund assets.
- b. Counsel will operate in accordance with the Investment Objectives and Policies, the Private Markets Reporting Guidelines and applicable Interim Directives.
- c. The real estate portfolio shall be suitably diversified to the extent that an adversity affecting a particular sector will not impact a disproportionate share of the real estate portfolio.
- d. Eligible property types for investment include industrial, multi-family, office, and retail.
- e. Qualified investments include substantially leased (not less than 60%), income-producing properties located in areas in the U.S. which exhibit reasonable economic diversification.
- f. The Real Estate portfolio shall maintain a minimum overall leased level commensurate with NCREIF or higher.
- g. Real estate shall be acquired using 501(c)(25) holding corporations or limited liability companies with the System as sole shareholder unless Counsel deems another structure appropriate.
- h. Forward commitments are agreements to acquire property at completion of construction and are limited to 15% of the manager's invested portfolio value. If a manager elects to use forward commitments they must meet the following parameters:
 - i. The buyer must have the ability to void purchase if the project is not completed on time and on budget, and in accordance with plans and specifications.

- ii. The forward commitment period shall not exceed eighteen months.
- iii. The investment should generate a minimum initial income return at least 0.5% higher than a comparable investment that requires immediate funding.
- iv. The developer of the property must have a strong track record of constructing quality buildings with creditworthy tenants on time and on budget.

2. Private Equity:

- a. The objective of the private equity portfolio is to produce a net return (internal rate of return), that exceeds the S&P 500 +3% per year over rolling 10-year periods with commensurate volatility. The private equity target allocation is 6% of the total fund assets, with an allocation range tolerance between 4% and 8% of total fund assets.
- b. Counsel will operate in accordance with the Investment Objectives and Policies, the Private Equity Reporting Guidelines and applicable Interim Investment Directives.
- c. The private equity portfolio shall be suitably diversified so that an adversity affecting a particular sector will not impact a disproportionate share of the private equity portfolio.
- d. Private equity may include primary partnership investments and secondary partnership interests and co-investments in U.S. and international investments in the following strategies:

Acquisitions - purchase of a majority interest of the stock of a company using leverage. Investments are categorized by size (small, medium, large and mega) as well as strategy (value, growth, industry consolidation and platform).

Growth Equity - purchase of a minority equity position in a company for the purpose of growth and expansion.

Debt Related - investment in the debt of the company. This may include mezzanine debt, subordinated debt, or debt of companies under varying levels of distress.

Special Situations - comprises several different partnership strategies, including industry-focused, turnaround, or a combination of multiple strategies.

Venture Capital - financing of rapidly growing companies that typically have a technology component. Investments are categorized by stage, ranging from seed to late-stage.

Co-Investments - Investments directly in portfolio companies alongside a fund's General Partner

- e. Private equity primary partnership minimum criteria:

-
- i. **Cohesive management team.** At least two partners must have a minimum of 5-years investment experience as a team.
 - ii. **Strong identifiable deal flow.** Partnership must have access to investment opportunities in the stated strategy that are demonstrably superior.
 - iii. **Appropriate strategy.** Stated strategy must be in sync with current and expected investment environment.
 - iv. **Multiple cycle experience.** Team must have relevant experience over a long enough period of time to cover multiple business and investment cycles.
 - v. **Successful, replicable performance.** Team has historically generated strong performance relative to peers.
 - vi. **Liquidations for profit.** Experience must include at least ten "roundtrip" (development through profit realization) investments of which most were for substantial profit.
- f. Commitment to each new primary and secondary partnership is limited to 15% of that partnership's total commitments at time of final closing.
 - g. A maximum of 15% of Counsel's portfolio may be invested with a single general partner. No more than 25% of Counsel's portfolio may be invested in partnerships whose primary focus is international investments in countries included in the MSCI World ex USA Index.
 - h. Private equity primary and secondary investments shall be made using a limited partnership structure with the System as a limited partner unless Counsel deems another structure appropriate.
 - i. Private equity co-investments:
 - i. **Qualified General Partners.** The System will only make co-investments alongside private equity partnerships in which the System has previously made an investment following extensive due diligence. These qualified general partners must have suitable strategies and attractive investment success ratios. Counsel will only consider opportunities in sectors, geographies, and deal size ranges in which the qualified general partner has historically been successful.
 - ii. **Enhanced Economics.** A co-investment opportunity must be expected to have enhanced economics (e.g., no annual management and no carry, but permitting administrative fees and expenses and broken deal fees and expenses) when compared with a primary investment.
 - iii. **Appropriate Governance.** Counsel will reasonably determine that the System has appropriate investment and governance rights for the co-investment opportunity.
 - iv. **Portfolio Guidelines and Diversification.** A co-investment opportunity will comply with the System's co-investment investment guidelines (discussed

below in Section VI(D)(2)(j)-(k)) and, over time, the System will seek to build a well-diversified portfolio of co-investments across industry, region, transaction size, and time period, while maintaining the flexibility to be opportunistic.

- v. **Due Diligence Process.** Before Counsel commits the System to a co-investment opportunity, it will review due diligence materials from the general partner and its Consultants, assess the general partner's due diligence process, determine key risks and negotiate the key legal terms.
- j. The System's co-investment program allocation will be limited to an annual amount of up to 15% of the annual target allocation for primary partnership investments and secondary investments as calculated by Counsel.
- k. Inclusive of the indirect investment through each primary partnership commitment, an individual co-investment shall not exceed 1% of the market value of the System's private equity portfolio at the time the co-investment is completed.

E. Securities Lending:

1. The investment objective for the securities lending program is to maximize incremental income within a high quality investment program that safeguards the return of principal, maintains adequate daily liquidity, ensures diversification and tightly controls exposure to fluctuating interest rates. Mutually acceptable revenue objectives shall be established at the beginning of each fiscal year.
2. The System's share of income earned shall be distributed within eight working days following the end of each month.
3. The securities lending process shall be transparent to other Counsel.
4. No more than 33 1/3% of total assets (not including collateral) may be on loan. Lending assets shall be defined as the value of assets on loan.
5. In all cases, loans will be collateralized by cash or securities issued or guaranteed by the U.S. Government, its agencies or instrumentalities. Collateral received for the lending of U.S. securities must equal at least 102% of market value, plus accrued interest in the case of fixed income securities. Collateral received for the lending of international securities must equal at least 105% of market value, plus accrued interest in the case of fixed income securities. Securities Lending Counsel shall be responsible for monitoring collateral levels and exercising daily marks to market.
6. Loan maturities shall not be negotiated for longer than one year. No more than 15% of the portfolio shall be on loan longer than six months.
7. Securities Lending Counsel shall perform ongoing credit analysis of brokers and establish individual concentration limits, which may be amended from time to time. Broker default indemnification, provided by Securities Lending Counsel, shall not relieve Securities Lending Counsel from ongoing credit review.
8. Securities Lending Counsel is authorized to invest cash collateral in the following investment vehicles:

- a. Overnight repurchase agreements, 102% collateralized by U.S. government obligations issued or guaranteed by the U.S. Government, its agencies, or instrumentalities.