Central Indiana Community Foundation, Inc.
The Indianapolis Foundation
Legacy Fund, Inc.

Investment Policy Statement
Date Approved: November 2007

I. DEFINITIONS

A. Purpose

This Investment Policy Statement was adopted by Central Indiana Community Foundation, Inc., The Indianapolis Foundation and Legacy Fund, Inc. (hereinafter collectively referred to as 'Foundations') to establish a clear understanding of the Foundations' philosophies and investment objectives. This document will describe the standards utilized by the Joint Investment Board (hereinafter, "JIB") in monitoring investment performance, as well as, serve as a guideline for any investment manager retained.

The Foundations share a purpose to accumulate a pool of assets sufficient to build capital for future use with the corresponding obligation to support current and future community needs. While shorter-term investment results will be monitored, adherence to a sound long-term investment policy, which balances short-term spending needs with preservation of the real inflation-adjusted value of assets, is crucial to the long-term success of the Foundations.

B. Scope

This Policy applies to all assets that are currently included in the Foundations' investment portfolio which is referred to as the "CICF Endowment Pool" (hereinafter referred to as the "Fund").

C. Investment Objective

The primary investment objective of the Fund is to achieve an annualized total return (net of fees and expenses), through appreciation and income, equal to or greater than the rate of inflation (as measured by the broad, domestic Consumer Price Index) plus any spending and administrative expenses thus, at a minimum maintaining the purchasing power of the Fund. The assets are to be managed in a manner that will meet the primary investment objective, while at the same time attempting to limit volatility in year-to-year spending.

D. Fiduciary Duty

In seeking to attain the investment objectives set forth in the policy, the JIB shall exercise prudence and appropriate care in accordance with the Uniform Prudent Investor Act (UPIA). UPIA requires fiduciaries to apply the standard of prudence "to any investment as part of the total portfolio, rather than to individual investments." All investment actions and decisions must be based solely in the interest of the Foundations. Fiduciaries must provide full and fair disclosure to the Foundations' boards and JIB of all material facts regarding any potential conflicts of interests.

As summarized for the purposes of this Investment Policy Statement, the UPIA states that the JIB is under a duty to the Foundations to manage the funds as a prudent investor would, in light of the purposes, scope, objectives and other relevant circumstances. This standard requires the exercise of reasonable care, skill, and caution while being applied to investments not in isolation, but in the context of the portfolio as a whole and as a part of an overall investment strategy having risk and return objectives reasonably suited to the Foundations. In making and implementing investment decisions, the JIB has a duty to diversify the investments unless, under special circumstances, the purposes of the Foundations are better served without diversifying.

In addition, the JIB must conform to fundamental fiduciary duties of loyalty and impartiality. This requires the JIB to act with prudence in deciding whether and how to delegate authority, in the selection and supervision of agents, and incurring costs where reasonable and appropriate.

E. Description of Roles

1. **Central Indiana Community Foundation, Inc. Board of Directors**
   The Indianapolis Foundation, Board of Trustees
   Legacy Fund, Inc., Board of Directors
   The individual Boards of each of the three Foundations have the ultimate fiduciary responsibility for their Foundation's investment portfolio. The Boards must ensure that appropriate policies governing the management of the Foundations are in place and that these policies are being effectively implemented. To implement these responsibilities, the Board sets and approves the Investment Policy Statement and delegates responsibility to the Joint Investment Board for implementation, execution and ongoing monitoring.

2. **Joint Investment Board (JIB)**
   The Joint Investment Board is responsible for implementing the Investment Policy. This responsibility includes approving investment strategy, hiring and firing of investment managers, custodians and investment consultants, monitoring performance of the investment portfolio on a regular basis, annually reviewing this Investment Policy Statement, and maintaining sufficient knowledge about the portfolio and its managers so as to be reasonably assured of their compliance with the Investment Policy Statement.

3. **Management & Staff**
   CEO has ultimate management oversight responsibility for the investments of the Foundations and will assure that the investment approach is aligned with the Foundations' overall strategic plan. CEO will receive regular, periodic updates from the CFO and Investment Analyst and will keep abreast of current investment trends.

   CFO is responsible for all actions of the Investment Analyst and will have frequent, periodic meetings regarding daily happenings within the investment portfolio. CFO will keep abreast of current investment trends, play an active role in meeting with managers and investment consultants, and will also assure that the investment approach is aligned with the Foundations' overall strategic plan.

   Investment Analyst will be responsible for the daily activities in implementing decisions made by the JIB including new account/fund relationships, capital calls, distributions, and other related activities. Investment Analyst will serve as the main staff liaison with the JIB and will keep the CFO informed of all activities. Investment Analyst is responsible for maintaining adequate documentation for due diligence and on-going monitoring of all investments to meet annual audit requirements.

4. **Investment Consultant**
   The investment consultant is responsible for assisting the JIB and management in all aspects of managing and overseeing the investment portfolio. The consultant is the primary source of investment education and investment manager information. On an ongoing basis the consultant will:
   a. Provide proactive recommendations
   b. Supply the JIB with reports (e.g. asset allocation studies, investment research and education) or information as reasonably requested
   c. Monitor the activities of each investment manager or investment fund
   d. Provide the JIB with quarterly performance reports
   e. Review this Investment Policy Statement with the JIB

F. Spending Policy

The current spending policy for the Fund is 5% as adopted by each of the three Foundations. The spending policy is subject to change, by the approval of each Board. The spending rate is applied to each fund's year end balance to calculate the recommended amount of grant distributions for the subsequent year. Based on years of research and analysis by various endowment and investment professionals, the Boards believe the 5% spending policy provides both investment growth and consistent grant distributions

II. INVESTMENT PHILOSOPHY

A. Strategy

The JIB understands the long-term nature of the Fund and believes that investing in assets with higher return expectations outweighs their short-term volatility risk. As a result, the majority of assets will be invested in equity or equity-like securities, including real assets (real estate and natural resources). Real assets provide the added benefit of inflation protection.

Fixed income and absolute return strategies will be used to lower short-term volatility and provide stability, especially during periods of deflation and negative equity markets. Cash is not a strategic asset of the Fund, but is a residual to the investment process and used to meet short-term liquidity needs.

B. Asset Allocation

Asset allocation will likely be the key determinant of the Fund's returns over the long-term. Therefore, diversification of investments across multiple markets that are not similarly affected by economic, political, or social developments is highly desirable. A globally diversified portfolio, with uncorrelated returns from various assets, should reduce the variability of returns across time. In determining the appropriate asset allocation, the inclusion or exclusion of asset categories shall be based on the impact to the total Fund, rather than judging asset categories on a stand alone basis.

The target asset allocation should provide an expected total return equal to or greater than the primary objective of the Fund while avoiding undue risk concentrations in any single asset class or category, thus reducing risk at the overall portfolio level. To achieve these goals, the asset allocation will be set with the following target percentages and within the following ranges:

ASSET CATEGORY	TARGET	RANGE
GLOBAL EQUITY	**64.5%**	**50-80%**
Public	***45***	***30-80***
U.S. Equities	25	15-50
Large Cap	*10*	*5-25*
Mid Cap	*8*	*0-15*
Small Cap	*7*	*0-15*
International Equities	20	5-30
Developed Large Cap	*10*	*5-20*
Developed Small Cap	*5*	*0-10*
Emerging Markets	*5*	*0-10*
Hedge Funds - Directional	***7.5***	***2-15***
Private	***12***	***0-20***
Buyout	6	
Venture Capital	4	
Special Situations	2	
GLOBAL FIXED INCOME	**15**	**10-40**
Interest Rate Sensitive	***10***	***5-30***
Investment Grade	5	
Inflation Protected (TIPS)	5	
Credit	***5***	***0-15***
High Yield	2.5	
Bank Loans	2.5	
REAL ASSETS	**13**	**0-20**
Real Estate	***5***	***0-15***
Public (REITs)	2	
Private	3	
Natural Resources	***8***	***0-15***
Private Energy	4	
Timber	4	
ABSOLUTE RETURN	**7.5**	**2-15**
CASH	**0**	**0-10**

C. Active vs. Passive Management

The asset allocation will be implemented using both active and passive investment managers. Highly efficient areas of the capital markets will be managed using primarily index funds and enhanced index/portable alpha strategies due to the low probability of traditional active management outperforming an appropriate benchmark.

D. Investment Styles

The JIB understands investment styles (growth and value) are cyclical, but believes that over the long-term, value stocks outperform growth stocks and this is more pronounced for smaller market capitalization (cap) stocks. Therefore, the Fund will employ a strategic overweight to value stocks, with a larger value overweight to mid and small cap stocks. Additionally, the Fund will employ a strategic tilt towards smaller market cap stocks, due to the JIB’s belief that over the long-term, small cap stocks outperform large cap stocks, although with higher volatility relative to larger cap stocks.

E. Rebalancing

The Investment Analyst will monitor the asset allocation structure of the Fund and attempt to stay within the ranges allowed for each asset category. If the portfolio moves outside of the ranges the Investment Analyst, with advice from the CFO and investment consultant, will develop a plan of action to rebalance. In many cases the additions of new money or withdrawals for spending will be used to rebalance in a cost effective manner.

F. Liquidity

A goal of the Fund is to maintain a balance between investment goals and liquidity needs. Liquidity is necessary to meet the spending policy payout requirements and any extraordinary events. The JIB understands that in many instances, the most appropriate investment option is one that comes with liquidity constraints. The tradeoff between appropriateness and liquidity will be considered throughout the portfolio construction process.

G. Illiquid and Semi-Liquid Investments

Illiquid investments include private equity, private real estate, and natural resources. Hedge funds are considered semi-liquid due to lock-up periods, redemptions, restrictions, and in some cases, illiquidity of the underlying investments.

1. Private Equity

The objective of the private equity allocation is to outperform, over the long-term, the public equity markets by 3-5% points, net of fees. The return premium exists due to the lower cost of capital, higher risk, lack of liquidity, and the uneven distribution of information and access inherent in private markets.

For the private equity allocation to achieve the expected objectives without unnecessary risk, the Fund should seek access to top-quality managers and be diversified. Individual funds may be concentrated in a particular sector, stage, or geographic region, but the overall private equity allocation should be diversified. A prudent investment strategy will consider the following areas for diversification.

a. Sub-Category

The target allocations to venture capital, buyout, and special situations (distressed, mezzanine, infrastructure etc.) will serve as a guideline for committing capital. As commitments to private equity are drawn down and invested over a period of years, and distributions are returned, the committed capital will be greater than the target allocation in order to reach the target market value.

b. Vintage Year

Capital should be committed continuously and thoughtfully over time. Returns are highly dependent on market cycles and stage of the investment cycle. A portfolio diversified by vintage years will reduce unnecessary risk and provide more consistent long-term returns.

c. Manager

Investments should be considered with several private partnerships (and fund of funds) to mitigate manager specific, as well as deal specific risk.

d. **Stage**
Investments should be considered across the life cycle of businesses. Within venture capital, this includes early, mid, and late stage companies. Buyout investments consist of small, mid, and large market firms, and may be in the form of traditional buyouts, growth equity, recapitalizations, or restructuring.

e. **Geography**
Investments should be considered across the U.S. and internationally (developed and emerging markets).

f. **Sector**
The portfolio should be diversified by sector, as well as across industries within a sector.

2. **Private Real Estate**
The objective of the private real estate allocation is to provide low correlation to the public equity and fixed income markets and serve as an inflation hedge.

For the real estate allocation to achieve the expected objectives without unnecessary risk, the Fund should seek access to top-quality managers and be diversified. Individual funds may be concentrated in a particular region or property type, but the overall real estate allocation should be diversified. A prudent investment strategy will consider the following areas for diversification.

a. **Sub-Category**
Private real estate investments should be considered in either value-added or opportunistic funds, which are designed to generate excess return for the overall real estate allocation. These strategies typically require some lease-up, development or repositioning, as well as utilize more leverage than public REITs. As commitments to private real estate are drawn down and invested over a period of years, and distributions are returned, the committed capital will be greater than the target allocation in order to reach the target market value.

b. **Vintage Year**
Capital should be committed continuously and thoughtfully over time. Returns are highly dependent on market cycles and stage of the investment cycle. A portfolio diversified by vintage years will reduce unnecessary risk and provide more consistent long-term returns.

c. **Manager**
By combining a public REIT allocation as a core holding (also provides liquidity) with investments in several private partnerships (and fund of funds), manager specific, as well as property specific risk, within the real estate allocation can be diminished.

d. **Geography**
Investments should be considered across the U.S. and internationally.

e. **Property Type**
The portfolio should be diversified across property types (e.g. apartments, office, industrial, and retail).

3. **Natural Resources (Energy and Timber)**
   The objective of the natural resources allocation is provide low correlation to the public equity and fixed income markets and serve as an inflation hedge. These investments should be primarily in the private markets, which offer inefficiencies that can be exploited.

   For the natural resource allocation to achieve the expected objectives without unnecessary risk, the Fund should seek access to top-quality managers and be diversified. Individual investments may be concentrated in a particular region, production stage, or commodity exposure, but the overall allocation should be diversified. A prudent investment strategy will consider the following areas for diversification.

   a. **Sub-Category**
      The target allocations to energy and timber investments will serve as a guideline for committing capital. As commitments to natural resources are drawn down and invested over a period of years, and distributions are returned, the committed capital will be greater than the target allocation in order to reach the target market value.

   b. **Vintage Year**
      Capital should be committed continuously and thoughtfully over time. Returns are highly dependent on market cycles and stage of the investment cycle. A portfolio diversified by vintage years will reduce unnecessary risk and provide more consistent long-term returns.

   c. **Manager**
      Investments should be committed to several private partnerships (and fund of funds) to mitigate manager specific, as well as deal specific risk.

   d. **Geography**
      Investments should be spread across the U.S. and internationally.

   e. **Stage/Type**

      i. **Energy**
         Investments in energy funds will focus primarily on the upstream end of the energy market with development and production, and to a lesser extent exploration. Exposure to the upstream markets will be gained through private equity investments, working interests, and royalty interests. Investment in downstream activities such as refining, transmission, and distribution may be considered opportunistically. Upstream markets offer two primary benefits:

         1) Inefficiencies, which offer attractive investment opportunities, and

         2) Exposure to the underlying commodity (oil and gas), which provides an inflation hedge.

      ii. **Timber**
         Investments with Timber Investment Management Organizations (TIMOs) should be diversified by wood type (hard and softwood, species, etc.). Investing in TIMOs exposes the portfolio to timber prices, providing inflation protection, with the potential to generate additional return through the underlying management of the timberland.

4. **Hedge Funds**

The objective of the hedge fund allocation is to diversify the Fund and provide returns with low correlation to the public equity and fixed income markets via structural advantages, including controlling market exposure through hedging and increased exposure to manager skill through unconstrained investment management and opportunistic investing.

Hedge funds are not an asset class, but rather an investment vehicle. The majority of hedge funds will have a "lock-up" period of 1-3 years from the date of investment, during which money generally cannot be withdrawn. Once the lock-up period expires, most hedge funds will then allow redemptions only at scheduled intervals (quarterly, semi-annually, etc.). Hedge funds, therefore, are semi-liquid investments due to the structure of the vehicle rather than the underlying investments (which may or may not be liquid).

For the hedge fund allocation to achieve the expected objectives without unnecessary risk, the Fund should seek access to skilled managers and be diversified. Individual hedge funds may be concentrated on a particular strategy, market or geographic region, but the overall allocation should be diversified. A prudent investment strategy will consider the following areas for diversification.

a. **Strategy**

The hedge fund universe can be divided into two broad categories: Absolute Return and Directional. Below are the definitions and examples of these strategies.

i. **Absolute Return**

These strategies are generally non-directional (not correlated to the markets) and tend to utilize multiple strategies that seek to exploit idiosyncratic (unique, non-market) risks that are not impacted by broad economic, political, or social events. Examples of these strategies include: Equity Market Neutral, Fixed Income Arbitrage, Merger Arbitrage, Convertible Arbitrage, and Relative Value Arbitrage.

ii. **Directional (Equity Hedge)**

These strategies tend to opportunistically invest in a broadly defined market with few constraints. As directional strategies, these funds will tend to be somewhat correlated with market movements, but generally do not closely track a market benchmark. These funds will take both long and short positions, use leverage, and actively manage market exposure. Examples of these strategies include Equity Hedge, Event-Driven, Global Macro, Distressed Securities, Emerging Markets, and Short Selling.

b. **Manager Diversification**

A "core-satellite" approach of combining a core allocation of fund of funds, with satellite investments in direct funds mitigates manager specific, as well as strategy specific risk.

III. Evaluation & Performance Measurement

A. Total Fund Benchmarks

The JIB seeks to outperform its benchmarks over full market cycles and does not expect that all investment objectives will be attained in each year. Furthermore, the JIB recognizes that over various time periods, the Fund may produce significant deviations relative to the benchmarks. For this reason, investment returns will be evaluated over a full market cycle (for measurement purposes: 5 years).

1. The primary objective of the Fund is to achieve a total return, net of fees, equal to or greater than spending, administrative fees, and inflation. The primary objective of the Fund is:

   Total Return greater than Consumer Price Index + 5% + Administrative Fees

2. A secondary objective is to achieve a total return in excess of the Broad Policy Benchmark comprised of each broad asset category benchmark weighted by its target allocation.

   The current Broad Policy Benchmark is:

WEIGHT	INDEX	ASSET CATEGORIES
45%	Russell 3000	U.S. Equity / Real Assets
25	MSCI ACWI ex-US	International Equity / Real Assets
30	LB Aggregate Bond	Global Fixed Income / Absolute Return / Real Assets

3. Another investment objective is to achieve a total return in excess of the Target Weighted Benchmark (TWB) comprised of each asset category benchmark weighted by its target allocation. The TWB will be adjusted periodically to match the actual allocation of the Fund due to the illiquid investments long time period needed to draw down capital.

   The current Target Weighted Benchmark is:

WEIGHT	INDEX	ASSET CATEGORY
10%	S&P 500	U.S. Large Cap
8	Russell Midcap	U.S. Mid Cap
7	Russell 2000	U.S. Small Cap
10	MSCI EAFE	International Developed
5	MSCI EAFE Small Cap	International Small Cap
5	MSCI Emerging Markets	Emerging Markets
7.5	C/S Tremont HFI Long/Short	Hedge Funds- Directional
12	Venture Economics Pooled Average	Private Equity
5	LB Aggregate Bond	Investment Grade Bonds
5	LB TIPS	TIPS
2.5	Merrill Lynch High Yield	High Yield
2.5	CSFB Leveraged Loan	Bank Loans
2	Morgan Stanley US REIT	REITs
3	NCREIF Property	Private Real Estate
4	CPI + 8%	Private Energy
4	NCREIF Timberland	Timber
7.5	U.S. T-Bills + 5%	Hedge Funds- Absolute Return

B. Manager Evaluation

1. Each active liquid (and hedge fund) investment manager will be reviewed by the JIB on an ongoing basis and evaluated upon the criteria listed below. The JIB expects the managers to outperform the benchmarks over a full market cycle (for measurement purposes: 5 years). The JIB does not expect that all investment objectives will be attained in each year and recognizes that over various time periods, investment managers may significantly underperform their benchmarks. Each investment manager will be reviewed on an ongoing basis and evaluated on the following criteria:

    a. Stability of the organization
    b. Retention of key personnel
    c. Absence of regulatory actions against the firm, its principals, or employees
    d. Adherence to the guidelines and objectives of this Investment Policy Statement
    e. Consistency in the style and capitalization characteristics defined as "normal" for the manager
    f. Performance compared to the appropriate benchmark and, for equity managers, produce positive alpha (risk-adjusted return) within the volatility limits set in the "Summary of Quantitative Performance Objectives" table
    g. Performance compared to a peer group of managers with similar styles of investing

2. Although there are no strict guidelines that will be utilized in selecting managers, the JIB will consider the criteria above, as well as, the length of time the firm has been in existence, its track record, assets under management, and the amount of assets the Fund already has invested with the firm.

C. Summary of Quantitative Performance and Risk Objectives

1. **Liquid and Semi-Liquid Active Managers**
The following table summarizes the quantitative performance objectives for the liquid and semi-liquid (hedge fund) active managers. Managers failing to meet these criteria over a full market cycle will undergo extensive qualitative and quantitative analysis. This analysis will focus on the manager's personnel, philosophy, portfolio characteristics, and peer group performance to determine whether the manager is capable of implementing their defined portion of the overall portfolio structure. These managers are expected to outperform their primary benchmark, and the equity (and REIT) managers are expected to maintain a beta (vs. the primary benchmark) of less than 1.20.

ASSET CATEGORY	PRIMARY BENCHMARK	PEER UNIVERSE
Global Equity		
U.S. Large Cap	S&P 500	Top 50%
U.S. Mid Cap	Russell Midcap	Top 50%
U.S. Small Cap	Russell 2000	Top 50%
International Developed	MSCI EAFE	Top 50%
International Small Cap	MSCI EAFE Small Cap	Top 50%
Emerging Markets	MSCI Emerging Markets	Top 50%
Global Fixed Income		
Investment Grade Bonds	LB Aggregate Bond	Top 50%
TIPS	LB TIPS	Top 50%
High Yield	Merrill Lynch High Yield	Top 50%
Bank Loans	CSFB Leveraged Loan	Top 50%
Real Estate		
Global REITs	Morgan Stanley US REIT	Top 50%
Hedge Funds		
Directional	C/S Tremont HFI Long/Short	-
Absolute Return	U.S. T-Bills + 3%	-

2. **Public Liquid Passive Managers**
   Passive (or index) managers are expected to approximate the total return of its respective benchmark. The beta for passive equity managers should approximate 1.00.

3. **Private Illiquid Managers**
   The majority of private equity, private real estate, and natural resource funds will be invested with private partnerships. These partnerships typically range from 7-15 years in life, during which time the Fund may not be able to sell the investment. Additionally, the partnership may not produce meaningful returns for 3-5 years (depending on the strategy). New investments will create a drag on fund performance in the early years (3-5 years) until these investments begin to mature. This drag on performance is often referred to as the J-curve, due to the shape created by plotting a line graph with performance on the y-axis and time on the x-axis. Private, illiquid manager performance will be measured utilizing internal rate of return (IRR) calculations and compared to an appropriate peer group. An IRR calculated from the inception of the partnership will be the primary performance measurement tool utilized for all private equity, private real estate, and natural resource managers.

   a. **Private Equity**
      Returns will be compared to the appropriate peer group in the Venture Economics universe of similar style (buyout or venture capital) and vintage year.

   b. **Private real estate**
      Returns will be compared to the NCREIF Property Index, which is reported on a time-weighted basis, but will be translated into an IRR for measurement purposes.

   c. **Timber**
      Returns will be compared to the NCREIF Timberland Index, which is reported on a time-weighted basis, but will be translated into an IRR for measurement purposes.

   d. **Energy**
      There are no suitable benchmarks for private energy. Private energy funds are utilized as an inflation hedge and thus, their returns will be compared to CPI + 8%.

IV. GUIDELINES & RESTRICTIONS

A. Overview

In today's rapidly changing and complex financial world, no list or types of categories of investments can provide continuously adequate guidance for achieving the investment objectives. Any such list is likely to be too inflexible to be suitable for the market environment in which investment decisions must be evaluated. Therefore, the process by which investment strategies and decisions are developed, analyzed, adopted, implemented and monitored, and the overall manner in which investment risk is managed, will determine whether an appropriate standard of reasonableness, care and prudence has been met for the Fund's investments.

The requirements stated below apply to investments in non-mutual and non-pooled funds, where the investment manager is able to construct a separate, discretionary account on behalf of the Fund. Although the JIB cannot dictate policy to pooled/mutual fund investment managers, the JIB's intent is to select and retain only pooled/mutual funds with policies that are similar to this Investment Policy Statement. All managers (pooled/mutual and separate), however, are expected to achieve the performance objectives. Each traditional equity and fixed income investment manager shall:

1. Have full investment discretion with regard to security selection consistent with this Investment Policy Statement
2. Immediately notify the CFO and consultant in writing of any material changes in the investment philosophy, strategy, portfolio structure, ownership, or senior personnel
3. Make no purchase that would cause a position in the portfolio to exceed 5% of the outstanding voting shares of the company or invest with the intent of controlling management

B. Public Equity Manager Guidelines (including REITs)

Each active equity investment manager shall:

1. Assure that no position of any one company exceeds 8% of the manager’s total portfolio as measured at market
2. Maintain a fully invested portfolio, with no more than 10% allocated to cash equivalents
3. Maintain a minimum of 25 positions in the portfolio to provide adequate diversification
4. Construct a properly diversified portfolio across sectors, industries, and for international/global mandates, countries
5. U.S. equity managers should have no more than 20% of the total portfolio invested in foreign stocks or American Depository Receipts (ADRs)
6. Vote proxies and share tenders in a manner that is in the best interest of the Fund and consistent with the investment objectives contained herein

C. Public Fixed Income Manager Guidelines

1. Each investment grade fixed income investment manager shall:
   a. Maintain an overall weighted average credit rating of A or better by Moody's and Standard & Poor's
   b. Hold no more than 10% of the portfolio in below investment grade (Baa/BBB) securities. (Split rated securities will be governed by the lower rating)
   c. Maintain a duration within +/-20% of the effective duration of the appropriate benchmark (does not apply to TIPS managers)
   d. Assure that any one issuer does not exceed 5% of the manager's portfolio, as measured at market value, except for securities issued by the U. S. government or its agencies

2. Each high yield/bank loan investment manager shall:
   a. Maintain an overall weighted average credit rating of B or better by Moody's and Standard & Poor's
   b. Hold no more than 20% of the portfolio in investments rated below B. (Split rated securities will be governed by the lower rating)
   c. Assure that any one issuer does not exceed 5% of the manager's portfolio, as measured at market value, except for securities issued by the U. S. government or its agencies

D. Illiquid and Semi-Liquid Investment Guidelines

Each investment will require a signed Subscription Agreement and Limited Partnership Agreement. The Fund may wish to have these documents reviewed by independent legal counsel. As these investments are typically private limited partnerships or offshore corporations, the JIB cannot dictate policy. The JIB, however, can request side letters for revisions or addendums to the Limited Partnership Agreement. The manager is ultimately responsible to manage investments in accordance with the Private Placement Agreement (PPM) and Limited Partnership Agreement.

The Fund is a tax-exempt organization, but certain investments may be subject to taxation on Unrelated Business Taxable Income (UBTI). Given that net risk-adjusted returns are the primary objective of the Fund, potential tax ramifications must be considered during the investment analysis and selection process. The Fund shall seek to minimize UBTI by selecting investment structures and geographic locations most beneficial to the Fund.

E. Derivative Security Guidelines

1. For definition purposes, derivative securities include, but are not limited to, structured notes, lower class tranches of collateralized mortgage obligations (CMOs), collateralized loan obligations (CLOs), principal only (PO) or interest only (IO) strips, inverse floating rate securities, futures contracts, forward contracts, swaps, options, short sales, and margin trading. Before allowing managers to utilize derivative instruments, the JIB shall consider certain criteria including, but not limited to, the following:
   a. Manager's proven expertise
   b. Value added by utilizing derivatives
   c. Liquidity of instruments
   d. Amount of leverage
   e. Management of counterparty risk
   f. Manager's internal risk controls and procedures

2. The strategies in which derivatives can be used are:
   a. Index Funds – Derivatives (typically futures contracts) will be used to securitize cash in order to fully replicate the performance of the index being tracked.
   b. Portable Alpha – Derivatives (typically futures or swaps) will be used to generate “beta”, while the notional exposure amount is actively managed to generate “alpha”.
   c. Fixed Income – Derivatives will be used as a cost efficient means to control and/or hedge risks such as duration, credit, and currency.
   d. Overlay/Transition Management – Derivatives (typically futures contracts) will be used to securitize cash to maintain the target asset allocation without buying and selling physical securities.
   e. Hedge Funds – Derivatives will be used for many purposes. These uses include hedging, risk management, leverage, and market exposure.

V. ACKNOWLEDGEMENT

We recognize the importance of adhering to the philosophy and strategy detailed in this policy. We agree to work to fulfill the objectives stated herein, within the guidelines and restrictions, to the best of our ability. We acknowledge that open communications are essential to fulfilling this objective, and therefore, recognize that suggestions regarding appropriate adjustments to this Investment Policy Statement or the manner in which investment performance is reviewed are welcome.

______________________________	______________________________
Central Indiana Community Foundation, Inc.	(Date)
______________________________	______________________________
The Indianapolis Foundation	(Date)
______________________________	______________________________
Legacy Fund, Inc.	(Date)
______________________________	______________________________
Investment Manager	(Date)
______________________________	______________________________
Fund Evaluation Group, LLC	(Date)