

Public Agenda Item #14

** Consideration of Investment Compliance Annual Report for 2023*

March 20, 2024

Tony Chavez, Internal Audit Director
Tressie Landry, Internal Audit Manager

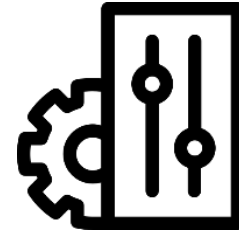
Agenda



Investment
Compliance Overview

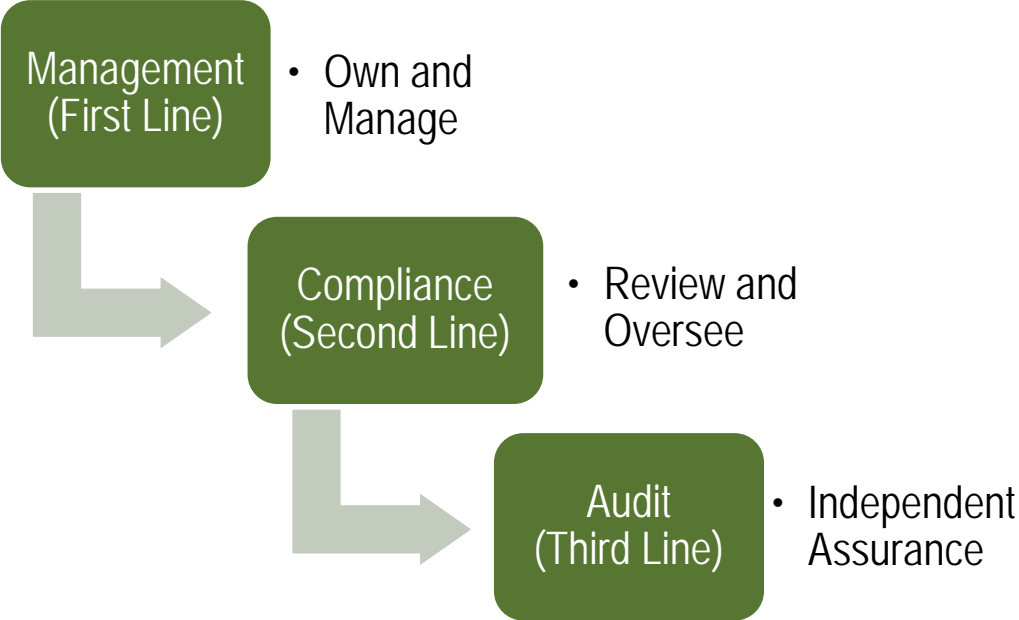
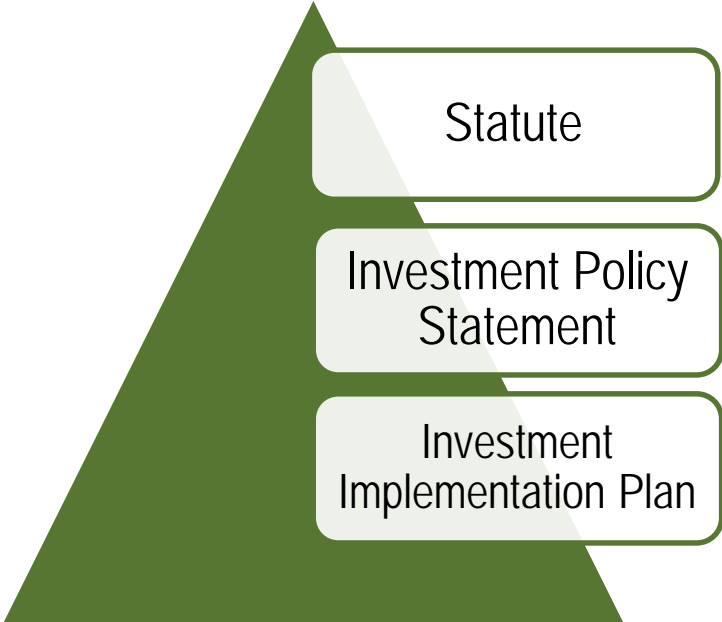


Annual Results



Action Plans

Governance Overview



Compliance Areas

Investment Compliance



Portfolio Compliance

Diversification

Tracking Error

Alternatives



Regulatory

Scrutinized Investments



Special Programs

Proxy Voting

Securities Lending

Ethics Compliance



Ethics Compliance

Misuse of Information

Conflict of Interest

Front Running/ Insider Trading

Outside Relationships
Gifts

Annual Results for 2023



Compliance Area	Function	CY23 Results
Portfolio Compliance	Diversification	No Exceptions
	Active Risk	
	Alternative Investment	
Regulatory	Scrutinized Investments	
Other Programs	Proxy Voting	
	Securities Lending	
Ethics	Standards of Conduct	
	Misuse of Information	
	Conflict of Interest	

Action Plan



Compliance Area	Action Item
Investment Compliance	<ul style="list-style-type: none">• Incorporate Risk Management assessments<ul style="list-style-type: none">- Focus of compliance activities- Frequency of compliance activities• Coordinate w/Investment Operations on compliance reports• Coordinate w/Stewardship Committee on Proxy Voting rules
Ethics Compliance	<ul style="list-style-type: none">• Automated approval of personal trades• Electronic tracking of gift receipts• Review Covered and Restricted Persons designations• Review Affirmation statements

Discussion