An Effective Investment Policy in a Changing Regulatory Environment

Deborah A. Cunningham, CFA
Chief Investment Officer
Federated Investors, Inc.

Ken Bodell
Director, Treasury Operations
The Mosaic Company
Why have a Policy

• Framework for making investment decisions and acting on external events such as downgrades
• Develops internal consensus on such topics as risk tolerance
• Gives comfort to bank lenders and rating agencies
Investment Policy Definition

• A document drafted by a firm that outlines general investment rules and parameters for specific accounts designed to protect a company from the financial risks associated with its business activities. This statement provides general investment goals and objectives of a firm and describes the strategies that the firm should employ to meet these objectives. It addresses such matters as asset allocation, risk tolerance and liquidity requirements.
Investment Policy Items to Consider:

- One Single Investment Policy or Many
- Security Types and Characteristics
- Ratings Requirements
- Liquidity Requirements
- Periodic Review
Regulatory Changes to Consider:

- Rule 2a7 MMF 2010 Amendments
- Rule 2a7 MMF 2013 Proposed Changes
- PWG & FSOC changes regarding rating requirements
One or Many Investment Policies:

- **Liquidity or Short-Term Investment Policy**
- Pension Investment Policy
- Project Finance Investment Policy

Regulatory Change Impact
Security Types and Characteristics:

- Maturity
- Quality
- Diversification
- Taxability
- Domicile
- Sovereign Tolerances
- Currencies

Better to reference a rule rather than the rule’s requirements?
Ratings Requirements:

- Current references in Rule 2a7
- Historical references in Rule 2a7
- PWG & FSOC changes regarding ratings requirements
Liquidity Requirements:

- CNAV or VNAV
- Tiering?

Regulatory Change Impact
Periodic Review:

- Annually or more often?
- As needed due to regulatory change
- Steering Committee
- Other Committees