



APPROVED BY THE BOARD OF TRUSTEES: EFFECTIVE JANUARY 2, 2020*

The Virginia Retirement System (VRS) sponsors several primary and supplemental defined contribution (DC) plans. Most plans operate fully under an unbundled (open architecture) approach whereby the investment function is contracted separately from the recordkeeping, enrollment and marketing functions. The purposes of the plans are set forth in the Plan Documents and Master Trusts, which are accessible on the VRS website at varetire.org.

This Investment Policy Statement has been adopted by the VRS Board of Trustees (Board) to provide guidelines for the investment offerings under an unbundled plan construct. Plans using an unbundled structure approach include the Deferred Compensation Plan of the Commonwealth of Virginia, the Virginia Cash Match Plan, the Optional Retirement Plan of the Commonwealth of Virginia for Political Appointees, the Optional Retirement Plan of the Commonwealth of Virginia for Public School Superintendents, the Virginia Supplemental Retirement Plan, the defined contribution component of the Hybrid Retirement Plan and the Optional Retirement Plan of the Commonwealth of Virginia for Employees of Institutions of Higher Education.

1. Investment Objectives

In a defined contribution investment program, each participant has his or her own risk tolerance, time horizon and investment objectives. Participants are responsible for their own investment decisions. To help meet these varying needs, the VRS unbundled DC plans seek to provide participants with an array of investment choices across a range of asset classes, risk levels, and investment strategies so they can construct and/or invest in portfolios that address their individual needs, and do so using investment vehicles and structures that provide competitive risk-adjusted returns at a reasonable cost.

The Board recognizes that DC plan participants have varying levels of investment knowledge and/or interest in actively managing their investments. The following organizational framework has been designed to categorize the types of investment options available to VRS unbundled DC plan participants:

- *Do-It-For-Me Investors:* These investors may have limited investment knowledge, confidence, or interest in managing their investments. For whatever reason, they prefer a pre-packaged, diversified investment option that has been designed to reasonably fit most people of their ages and retirement planning horizons. To meet this need, a series of Target Date Portfolios is made available whose investment policy, glide paths, and investment strategies are expected to meet the general needs of the average DC plan participant, based on a periodic analysis of the demographic characteristics of participants and the long-term investment opportunity set.

- *Help-Me-Do-It Investors:* These investors have some knowledge of investments and want to be more involved in structuring their portfolios, but they would like the ability to pick from a menu of fund options that have been screened by VRS and for which investment fees and expenses have been negotiated to institutional price levels through VRS bargaining power. To meet this need, a menu of Core Investment Options is made available, each targeted to a different asset class or strategy. The core fund lineup will generally consist of funds representing the constituent asset classes included in the target date portfolios, but there may be funds included in the core lineup that are not included in the target date portfolios, and vice versa.
- *Do-It-Myself Investors:* Some investors are very knowledgeable and/or desire to take a very active approach to their investments, and therefore may desire investment alternatives in addition to those offered as part of the Target Date Portfolios or Core Investment Options. To meet this need, a self-directed brokerage account (SDBA) is made available to self-designated knowledgeable investors who are willing to accept all risks, costs, and operational rules and procedures related to participating in a SDBA.

2. Decision Making

The Board is responsible for the following:

- Selection of the default investment option. (Appendix 1)
- Within Target Date Portfolios, ensuring a robust process is used to establish the glide path's asset allocation and to determine which asset classes and strategies to include. (Appendix 1)
- Within the Core Investment Options, included asset classes. (Appendix 2)
- Whether to offer a Self-Directed Brokerage Account (SDBA). (Appendix 3)
- Whether individual investment advice will be provided and the terms on which it will be available to participants.

Beyond these guidelines, the Board delegates to the Chief Investment Officer (CIO) all other decisions related to VRS unbundled defined contribution investments. Changes that are contemplated are expected to be done with due consideration of administrative needs as to the operations, outreach, and communications, etc. The CIO or a designee will report regularly to the Defined Contribution Plans Advisory Committee (DCPAC) and Board on the status and investment results of the DC investment program. Included in such reporting will be performance benchmarks selected by the CIO to appropriately measure or compare the risk and investment objectives of the various investment options.

In carrying out its fiduciary duty to oversee DC investments, the Board will consider advice and recommendations provided by the DCPAC. The specific duties and responsibilities of the DCPAC are described in the DCPAC Charter.

Additionally, the Board developed a set of twelve Defined Contribution Plans Investment Belief Statements intended to help guide the strategic management of the VRS DC investment program.

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3. Plan Level Policies

The CIO has full authority to hire and terminate investment managers and negotiate or renegotiate fees. The CIO shall develop policies and procedures for hiring, monitoring, and terminating investment managers and other investment related service providers. The CIO shall also develop procedures for appropriate mapping of plan assets and/or funds as situations arise. Mapping means the transfer of assets from a discontinued investment option or terminated investment manager to another investment option or investment manager under the DC plans. The CIO works with the Director to coordinate implementation relating to changes to the unbundled DC plans investment program and may consult with the DCPAC as needed.

The CIO is responsible for ensuring that adequate due diligence is being performed in the evaluation of potential and existing investments, and that all investment activity will be in compliance with applicable regulatory requirements.

4. Trading Restrictions and Redemption Fees

The Board and the investment managers may impose restrictions and/or fees that discourage investment trading that could have an adverse impact on the management of a fund, other plan participants, or clients of the fund's management.

5. Best Execution

Generally, all investment transactions executed on behalf of the plans should be made on the basis of best execution. VRS defines best execution as the process and price that results in the best overall performance impact, as judged by the portfolio manager, taking into account current market conditions. VRS will generally discourage the use of soft dollar arrangements, and where such arrangements are utilized, staff will review this usage for reasonableness.

6. Use of Consultants/Service Providers

The CIO has the authority to hire consultants, research providers, and other service providers providing that such expenditures are in alignment with the Board approved operating budget.

7. Code of Ethics

The investment staff will conduct its affairs in a manner that reflects the highest standards of ethical conduct. The staff is expected to comply with the [CFA Institute of Code of Ethics and Standards of Professional Conduct](#).

**Target Date Portfolios
As of November 14, 2013
Appendix 1**

A series of target date portfolios with investment policy glide paths and investment strategies that are expected to meet the general needs of the average DC plan participant in different age cohorts is offered through the plans. A glide path represents the changes made to the asset allocation mix over time as the target date approaches. There is a higher equity allocation in the longer dated portfolios because of the long-term investment time horizon. Over time, the equity allocation decreases as the investment time horizon decreases.

The Board expects target date portfolios to be broadly diversified. These portfolios may include exposure to various sub-segments of the broad asset classes as well as to alternative asset classes as determined by the target date provider using reasonable optimization techniques to measure the risk/reward trade off. Asset classes used within target date portfolios may include: large cap domestic equity, small/mid cap domestic equity, international equity, emerging market equity and debt, domestic core fixed income, high-yield bonds, inflation-protected securities, international/global fixed income, commodities, real estate and cash. A target date portfolio is not required to include each of these asset classes and may include other asset classes.

The target date portfolios' glide paths shall be based on sound investment theory and investment methodology as well as reasonable capital market assumptions. Plan demographics shall be taken into consideration when developing a custom glide path or selecting an off the shelf provider. Based on work done by a consultant together with VRS staff, advice from the DCPAC, and general investment philosophy of VRS, the Board expects to employ a glide path that is more on the conservative side of the target date portfolios available at the time of the study. The percentage allocation to equities in a more conservative glide path is comparatively lower than that of an aggressive glide path at retirement.

The target date portfolios serve as the unbundled DC plans default investment option.

**Asset Classes: Core Funds
As of November 14, 2013
Appendix 2**

Core investment options shall represent the broad asset classes available in the capital markets to the extent they are practical and, when prudent, certain sub-asset classes. The core fund lineup will generally consist of funds representing the constituent asset classes included in the target date portfolios, but there may be funds included in the core lineup that are not included in the target date portfolios, and vice versa. From time to time additional asset classes may be added or existing asset classes may be deleted in order to maintain an array of investment options that address participants' changing needs or changes in the investment industry.

The Board delegates to the CIO decisions as to 1) whether a fund investment option shall utilize a passive or active investment strategy or a combination of both; 2) whether a fund should exhibit a large, mid, or small capitalization structure or a combination thereof; 3) whether a fund should exhibit a growth, value, blended style, or targeted volatility orientation; 4) whether a fund should have a single investment manager or use multiple investment managers or firms; and 5) whether a fund invests in a single asset class or more than one asset class.

The following asset class categories are considered for possible inclusion in the plans:

Capital Preservation

- Money Market
- Stable Value

Fixed Income

- Investment grade (short-term, intermediate, long-term)
- Inflation-Protected
- High-Yield
- International/Global

Global Public Equity

- U.S. Equity
- Non-U.S. Developed Equity
- Emerging Equity

Real Estate (public & private)**Asset Allocation**

- VRS unitized investment portfolio (VRSIP) – includes all asset classes utilized in the VRS investment portfolio.



**Self-Directed Brokerage Account
As of November 14, 2013
Appendix 3**

A Self-Directed Brokerage Account (SDBA) is available for self-designated knowledgeable investors who acknowledge and understand the SDBA's operational rules and procedures as well as the risks and costs associated with the investments allowed in the SDBA. Subject to limitations imposed by the SDBA provider, allowable SDBA investments include mutual funds, exchange traded funds (ETFs) and individual securities. Participants must complete the SDBA enrollment materials prior to investing in the SDBA.

The SDBA is made available through the plans' third party administrator and is not contracted for separately. The third party administrator may change the SDBA provider from time to time.