



STATEMENT OF INVESTMENT POLICY

INTRODUCTION

This statement of Investment Policy serves the following purposes:

- Establishes objectives and guidelines for the investment of The Chicago Community Foundation (“Foundation”) assets that are consistent with the financial goals of the Foundation.
- Provides written documentation of the expectations regarding the investment of the assets for which the Investment Committee has responsibility.
- Outlines criteria and procedures for the ongoing evaluation of the investments of the Foundation.
- Outlines the duties and responsibilities of the various parties involved in the investment and oversight of the Foundation assets.

INVESTMENT OBJECTIVES AND GOALS

The Foundation's investment objectives are to manage the portfolio in a manner that will support the programs of the Foundation and achieve, over time, a total return (i.e., both income and capital appreciation) sufficient to preserve the purchasing power of the portfolio, while at the same time maintaining a prudent level of risk. While superior investment performance in excess of spending and inflation will increase the purchasing power of the portfolio, the Foundation acknowledges that new gifts and bequests will be the primary contributor of growth in the portfolio.

The investment goal is to achieve, over time, an average annual total return (net of fees and expenses) at least equal to the spending policy of the Foundation plus the rate of inflation as measured by the Consumer Price Index. The Foundation recognizes that its investment goal will not be met in every year or every measuring period and that these goals and objectives are intended to be achieved over time.

The total portfolio should be measured against its absolute investment goal (as set forth above), a custom benchmark that approximates as closely as possible the portfolio's target asset allocation, and a universe of comparable foundation and endowment funds.

Specifically, the performance of the portfolio as a whole should be measured against:

1. The Chicago Community Foundation's spending policy plus inflation as measured by the Consumer Price Index.
2. A balanced index composed of: 24% of the S&P 500 Index, 6% of the Russell 2500 Index, 7% of the MSCI EAFE Index, 5% of the MSCI EM Index, 15% of the MSCI World Index, 15% of the Barclays US Aggregate Bond Index, 15% of the HFRX Absolute Return Index, 10% of the C|A Global All Private Equity Index, and 3% of the 90-day US Treasury Bill Index. The Investment Committee will evaluate the risk and return of the policy



benchmark versus the composite performance over long term periods (three years and longer).

3. A peer group of similar foundation and endowment funds.

INVESTMENT GUIDELINES

Investment guidelines are the broad parameters within which the Investment Managers operate in executing and implementing the Investment Policy and making specific investment decisions. Outlined below are the Foundation's investment guidelines:

- The Investment Manager should assure itself of the appropriateness of any individual investment.
- The appropriateness and use of asset types not specified in this Investment Policy Statement is subject to the approval of the Investment Committee.
- Cash equivalents may be held in the equity portfolio at the discretion of the Investment Manager.
- The volatility of the portfolio, as measured by standard deviation, should be similar or not significantly greater than that of the policy benchmark.
- No single issue may exceed the greater of 10% of the portfolio or 3% over the weight in the benchmark index, at market value.
- The portfolio may contain no more than 5% of the outstanding shares of any company, nor may the portfolio contain any stock where the manager's aggregate holdings for all clients exceed 15% of the outstanding shares.
- The average quality of the fixed income portfolio should be no less than A rated or better.
- Commingled or mutual funds are governed by the prospectus or stated guidelines of the fund and are exempt from the above guidelines.
- Investments in derivative securities and any investment that generates unrelated business tax liability are prohibited unless prior approval is given by the Investment Committee. Current prohibited securities include, but are not limited to:
 - Restricted (letter) stock
 - Short-sale contracts
 - Option contracts
 - Futures contracts
 - Private placements
- The portfolio may contain opportunistic investments. Examples of opportunistic investments include real assets (timber, oil and gas), private placements, real estate, venture capital, REITS, and commodity trading. The Investment Committee's approval is required prior to making an opportunistic investment. In addition, the following guidelines must be met:



- The investment must be diversified and exhibit prudent risk characteristics so as not to unnecessarily expose the portfolio to a high level of risk.
 - The investment must have a minimum track record of three years.
 - The portfolio's exposure should not represent more than 5% of the assets of the total opportunistic investment.
- The Foundation has made strategic allocations to asset classes such as high yield fixed income and absolute return. These alternative asset classes employ strategies which involve the use of lower rated securities, short selling, derivative contracts and leverage. Therefore, the prohibited transactions noted above do not apply to these asset classes; however, prior approval by the Investment Committee is required for all alternative asset classes.

INVESTMENT MANAGER DIVERSIFICATION POLICY

The Chicago Community Trust's vision is a thriving, equitable and connected Chicago region where people of all races, places and identities have the opportunity to reach their potential. As part of our work to advance this goal, we believe it is important that the management of our investment portfolio is diverse in all respects, including race and gender, and we are committed to retaining a diverse pool of investment managers while achieving the investment objectives outlined elsewhere in this investment policy statement. Our investment manager diversification policy advances that commitment by encouraging investment with minority- or women-owned firms.

For purposes of this policy, a minority owned firm is defined as a firm that is at least 33% owned, controlled and operated by minority group members. For the purpose of this definition, minority group members include but are not limited to members of the Black, Latine, Asian or Pacific Island American, Native American, Alaskan Native, American Aleut and native Hawaiian communities. A woman-owned firm is defined as a firm that is at least 33% owned, controlled and operated by women.

In general, the following definitions apply:

- Owned = at least 33% of the business or 33% of the stock is owned by minorities and/or women
- Controlled = actively exercising the power to make policy decisions
- Operated = actively involved in the day-to-day management of the enterprise

While The Chicago Community Foundation supports the advancement of all minority groups, the Foundation understands that Black- and Latine-owned firms have been particularly underrepresented in the Chicago region.

To ensure continuing consideration of a diverse group of candidates, whenever there is a search for a new investment manager or during the re-balancing of the portfolio, the Foundation will take concrete steps to ensure that at least one qualified minority- or women-owned firm is considered for the opportunity. In the event that the finalists for the investment manager opportunity do not include a qualified minority- or women-owned firm, the Investment Committee will receive a description of the effort to locate minority- or women-owned firms within the search parameters.



The target allocation for minority- and women-owned manager representation in the investment portfolio is 20%.

Notwithstanding the Foundation’s commitment to maintaining a diverse pool of investment managers, the Foundation will at all times pursue its diversity goals and target allocation through nondiscriminatory means. In particular, the Foundation will take concrete steps to expand the diversity of the firms it considers for opportunities, but the Foundation will not select or prioritize any firm in the consideration process based on the race or gender of the firm’s owners or operators.

The Chicago Community Foundation also believes that regardless of ownership, all investment managers have a role to play in developing diverse investment talent. To complement the target allocation to minority- and women-owned managers listed above, at least annually, the Foundation will evaluate the diversity and inclusion efforts of all investment managers utilized in our pooled portfolios.

ASSET ALLOCATION STRATEGY AND PERFORMANCE BENCHMARKS

The following asset allocation strategy has been established to provide a diversified portfolio for the Foundation’s growth pool, in order to enhance total return and to minimize the risk of loss in any individual asset class.

Asset Class	Target Allocation	Range	Benchmark
Public Equity	57%	50-70%	MSCI World and MSCI ACWI
Large Cap	24%	15-40%	S&P 500
Small/SMID Cap	6%	0-10%	Russell 2500
Developed International	7%	0-10%	MSCI EAFE
Emerging Markets	5%	0-10%	MSCI EM
Global Equity	15%	0-20%	MSCI World and MSCI ACWI
Hedged Equity	0%	0-20%	S&P 500 and HFRX Hedged Equity
Fixed Income	15%	10-25%	Bloomberg US Aggregate
Diversifiers	15%	0-30%	HFRX Absolute Return
Private Assets	10%	0-30%	C A Global All PE
Private Equity	10%	0-30%	C A Global All PE
Private Debt	0%	0-5%	C A Private Credit
Cash	3%	0-10%	90 day US Treasury Bill

REBALANCING



The Investment Manager is responsible for maintaining the investments within their permissible ranges. If any asset class moves outside of the established rebalancing range for two consecutive quarters, the Investment Manager should rebalance the portfolio.

The Investment Committee of the Foundation will periodically review the policy asset allocation and policy benchmarks to ensure they remain appropriate for the needs of the Foundation.

SPENDING POLICY

The Foundation invests on a total return basis and distributions are made in accordance with a spending policy established by the Foundation. The annual spending rate falls within a range of 4% - 6% of the average market value, using a 12-quarter trailing average. The spending allocation includes/covers cash required for the Foundation's grant-making, administrative cost, investment management and custody expenses. (Donor advised funds are excluded from the spending policy unless this election is made.)

DUTIES AND RESPONSIBILITIES

Responsibilities of the Investment Committee:

- To act prudently and in good faith on behalf of the Foundation.
- Oversee the investment of the Foundation assets.
- Establish and adopt an investment policy for Foundation assets.
- Review investment policy on an ongoing basis and make such changes as may be required.
- Determine if the policy objectives and guidelines are being met.
- Set desired performance objectives and monitor the performance of the Investment Managers in meeting the objectives.
- Review the recommendations provided by the Investment Consultant and act in the best interest of the Foundation.
- Remove and replace an Investment Manager as appropriate to meet the investment goals and objectives of the Foundation.
- Select and replace the Investment Consultant as appropriate.

Responsibilities of the Investment Managers:

- Manage the Foundation assets under their control in accordance with the policy, objectives and guidelines included herein, as may be revised from time to time by the Investment Committee, and subject to the authority and oversight of the Investment Committee.
- Recommend changes in the investment policies, objectives or guidelines to the Investment Committee, as appropriate.
- Act in a prudent manner with respect to investment of the Foundation assets.
- Promptly inform Foundation staff and the Investment Committee regarding significant matters pertaining to the investment of the Foundation assets. This includes, at a minimum, the following:
 - Monthly portfolio asset statements.



- Monthly report of performance.
- Substantive changes in investment strategy and portfolio structure.
- Significant changes in ownership, organization structure, financial condition or professional staffing
- Brokerage commissions paid, in total and by broker, during each quarterly period and the average cost per share where commingled or mutual funds are used, a statement of brokerage policy and the average cents per share commission experience is acceptable.
- Proxies voted, in accordance with and where appropriate, by the policies established by the Investment Committee. Where commingled or mutual funds are used, a statement of proxy voting policy is acceptable.

Responsibilities of the Investment Consultants:

- Report monthly investment performance.
- Analyze trends in manager performance, asset allocation and other objectives and make recommendations to the Investment Committee regarding the same.
- Evaluate and propose strategies relevant to the future of the portfolio.
- Assist in the selection of investment managers.
- Model portfolios and calculate investment results under selected scenarios.
- Assist in the continuity of the Investment Committee and staff education.
- Analyze recommendations proposed by Investment Managers and advise the Investment Committee as to the appropriateness of the recommendations.

Responsibilities of the Foundation Staff:

- Act as the liaison between the Investment Committee, the Investment Managers and the Investment Consultant.
- Manage the investment activity to ensure sufficient Cash Flow to meet distribution requirements.
- Work with the Investment Consultants to compile information on investment return and performance for the Investment Committee's review.
- Interface with the Investment Committee to ensure necessary action items are brought to the Committee and that Committee decisions are implemented.

REVIEW PROCEDURES

Review of Policy

The Investment Committee, on an ongoing basis, will review all investment policies, objectives, and guidelines.

Review of Investment Results



The Investment Committee will monitor the performance of the Foundation assets quarterly (investment flash reports will be provided monthly) with the assistance of the Foundation Staff, the Consultant, and the Investment Managers. The components to be included in these reviews are as follows:

- Review of the results for each Investment Manager given their investment strategy and market conditions.
- Comparison of the results of each Investment Manager against the objectives and policy guidelines set forth in this document.
- Comparison of the total fund performance against:
 - a universe of other professionally managed funds with a similar asset mix.
 - the Chicago Community Foundation's spending policy plus inflation as measured by the Consumer Price Index.
 - a balanced index composed of: 24% of the S&P 500 Index, 6% of the Russell 2500 Index, 7% of the MSCI EAFE Index, 5% of the MSCI EM Index, 15% of the MSCI World Index, 15% of the Barclays US Aggregate Bond Index, 15% of the HFRX Absolute Return Index, 10% of the CJA Global All Private Equity Index, and 3% of the 90-day US Treasury Bill Index.
 - a peer group of similar foundation and endowment funds

Review of the Investment Managers

- The Investment Committee, the Foundation staff and the Consultant will review the performance of the Investment Managers and their adherence to the restrictions and policies applicable to the assets under management on a regular basis to determine whether the managers have performed in accordance with their stated investment approaches. On a quarterly basis, the managers are expected to provide a comprehensive review of strategy and performance, as well as an indication of anticipated portfolio changes. Each manager must promptly communicate significant changes in staffing, organization structure, assets under management or investment philosophy.
- On an ongoing basis, the managers will be evaluated to determine their progress toward achieving the investment objectives specified herein. Failure by a manager to achieve policy objectives may cause the Investment Committee to reexamine the manager's investment style and philosophy and may lead to a revised investment strategy.
- As requested, each manager will be expected to meet with the Investment Committee, the Foundation Staff, and the Consultant to provide:
 - A verbal and written review of their investment performance and portfolio structure.
 - A synopsis of their key investment decisions, their underlying rationale and expected future implications.
 - An organizational update