Statement of Investment Policies and Objectives

University of Rochester Retirement Plan

April 2023
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Purpose

The University of Rochester (the “University”) has established the University of Rochester Retirement Program (the “Plan”), a defined contribution retirement plan under Section 403(b) of the Internal Revenue Code of 1986, as amended (the “Code”). The purpose of the Plan is to provide eligible participants, as defined in the Plan, with a resource to help meet their financial needs during retirement and provide them with an opportunity to save and invest for retirement on a tax-deferred basis.

The Plan is a participant directed individual account plan, and participants are responsible for their investment choices. Participants alone bear the risk of investment results from the options and asset mixes that they select.

Pursuant to the terms of the Plan, the Retirement Plan Committee (the “Committee”) generally has the authority and responsibility to select and monitor the investments that are available under the Plan.

The purpose of this Statement of Investment Policies and Objectives (the “Investment Policy”) is to set forth nonbinding guidelines and principles the Committee will consider in fulfilling this responsibility. The Investment Policy is not intended to impose or create any requirements or standards beyond those set forth under applicable laws.

This Statement:

- Describes the investment philosophy for investments offered under the Plan;
- Describes certain responsibilities of the Committee and other parties under the Plan;
- Sets forth the current Plan investment structure and options; and
- Establishes the criteria for selecting and monitoring the investment options offered under the Plan.

If any term or condition of this investment policy conflicts with any term or condition in the Plan, the terms and conditions of the Plan shall control. The Committee reserves the right to amend the Policy at any time.
Philosophy

Objective

The objective of the Plan is to help eligible employees to accumulate savings for retirement by offering a flexible, lower cost and tax-effective way to set aside money for retirement.

Diversification/Number of Options

The Committee structures the Plan to provide sufficient investment options so that participants can create an investment program that is consistent with a variety of risk tolerances. The Plan is intended to comply with the requirements of Section 404(c) of the Employee Retirement Income Security Act of 1974, as amended (“ERISA”) and the Department of Labor regulations issued thereunder. These rules establish minimum standards regarding the number and type of options that should be offered in order to relieve fiduciaries of liability for participants’ investment decisions. Accordingly, the Plan will:

- Offer participants a broad range of investments, including at least three core options that are internally diversified, materially different in risk and return characteristics, and, in the aggregate, allow participants to tailor risk through diversification;

- Give participants the ability to transfer among the Plan’s core investment options with a frequency appropriate for each investment’s market volatility, and the ability to transfer among core investment options at least once in any three-month period (excepting annuity investments that may impose transfer restrictions in excess of three months); and

- Provide participants with certain information about the Plan, its investment options, and its operations, to assist participants in making their investment decisions.
Delegation of Responsibilities

Committee Responsibilities
The Committee is generally responsible for selecting investments available to participants in the Plan. Neither the Committee nor any other Plan fiduciary shall be responsible for the investment decisions made by a participant or beneficiary. With respect to the Plan’s investment options, the Committee’s responsibilities include:

- Developing and monitoring this Investment Policy, as well as revising this Investment Policy as the Committee deems appropriate;

- Selecting and monitoring the investment options available under the Plan (including number and types);

- Engaging investment consultants, attorneys and other professionals to assist the Committee in carrying out its responsibilities under the Plan;

- Selecting and monitoring Plan service providers;

- Employing such agents and other assistance as it may deem appropriate in carrying out its responsibilities under the Plan;

- Establishing such rules and procedures relating to the investment options as it deems appropriate;

- Reviewing fees and other costs associated with the management of the Plan for reasonableness; and

- Delegating proxy voting related to holdings in the Plan directly to participants.

Notwithstanding the forgoing, the Committee does not have the discretionary power, authority or responsibility to terminate certain investment options that are subject to contractual or other limitations that supersede the discretionary power of the Committee (e.g., the Committee does not have the power or authority to terminate certain individual insurance contracts/annuities offered through TIAA). The Committee does have the discretion to freeze future contributions to individual insurance contracts.

While the Committee is responsible for determining whether to offer a participant-directed mutual fund brokerage option under the Plan and for selecting and monitoring any provider of brokerage services offered under the Plan, the Committee is not responsible for the selection and monitoring of the actual mutual funds that are offered through the participant-directed mutual fund brokerage account, or a participant’s or beneficiary’s purchase of mutual funds through the brokerage account.
Investment Consultant Responsibilities

The Investment Consultant shall assist the Committee in fulfilling its fiduciary responsibilities under the Plan. Specifically, the Investment Consultant’s duties shall include:

- Providing the Committee information and advice about available investment options and assisting the Committee in the selection and review of the investment fund options offered by the Plan;
- Assisting the Committee in the development and review of the Investment Policy;
- Periodically providing the Committee with information and advice about the investment performance, risk and fees of investment options offered by the Plan, information that might affect future performance or suitability of the investment options currently offered to continue to be offered as investment options of the Plan, and the availability of more suitable alternatives;
- Keeping the Committee informed of developments and changes affecting investments offered by defined contribution retirement plans;
- Comparing fees incurred in administering the Plan against appropriate benchmarks to confirm reasonableness; and
- Assisting the Committee with its evaluation of the performance of the recordkeeper.

In its role, the investment consultant is expected to provide the following services:

- Produce periodic written investment performance, risk and fee evaluation reports of investment options offered by the Plan;
- Meet with the Committee to review investment performance, risk and fee results and the investment program’s offerings as a whole;
- Provide materials related to fund structure, policies and objectives, and other topics of relevance to the retirement plan investment program including developments in retirement plan administration and in the responsibilities of retirement plan fiduciaries;
- Recommend changes to the investment options offered under the Plan if the Investment Consultant believes such changes are warranted;
- Address topics of interest related to the retirement plan investment program; and
- Participate, as necessary, in various projects as requested by the Committee.

The Investment Consultant will act as a Plan fiduciary and will serve as an advisor to the Committee. The Committee is responsible for making the final decision on the investments that are made available to Plan participants.

Recordkeeper Responsibilities

The recordkeeper(s) of the Plan will be responsible for:
• Maintaining and updating individual account balances, including information regarding plan contributions, withdrawals, and distributions and otherwise acting on the directions of the Committee or its authorized delegates;

• Providing participants account access through the Internet, interactive voice response, presentations to large groups of participants, one on one meetings with participants on campus and a call center;

• Producing quarterly participant statements;

• Conducting compliance testing (if applicable);

• Providing education and consulting services including, but not necessarily limited to, pre-retirement education, investment newsletter, financial planning program, and new employee orientation;

• Providing regular reports to the plan administrator; and

• Participating, as necessary, in various projects as requested by the Committee.

Participant Responsibilities
The Plan’s participants have different investment objectives, time horizons, and risk tolerances. To meet these varying investment needs, participants will be able to direct their account balances among a range of investment options that vary in risk and return. Participants solely bear the investment risk and their accounts reflect the gains or losses that result from their chosen investment options.

Participants of the Plan are responsible for:

• Educating themselves regarding the various aspects of saving and investing;

• Making voluntary contributions to the Plan within the limits allowed by the law that are sufficient to provide for adequate retirement assets; and

• Selecting and monitoring their investments choice or accepting the Plan’s default investment choices.
Investment Structure and Investment Option Selection

While offering a variety of fund options is important, efforts will be made to keep the total number of investment options to a level that balances the benefits of broad diversification with the disadvantages of too much choice.

Investment Structure

The federal rules generally permit the Plan to offer only mutual funds and annuities. The Committee has decided that the Plan’s investment structure may include the following components:

Tier I: Target Retirement Funds — a series of multi-asset class investment funds where the allocation among investments of various risk levels changes based on a participant’s age and expected retirement date. The Committee has designated the Target Retirement Funds to be the Plan’s qualified default investment alternative.

Tier II: Core Funds — a limited number of investment funds that are pre-selected for distinct asset class risk and return characteristics. The funds can include both actively managed and passively managed (“index”) investment funds composed of at least one investment option from, but not limited to: money market funds, diversified bond funds, U.S. Stock Funds and Non-U.S./Global Stock Funds.

Tier III: Annuities — fixed annuities that allow participants to purchase fixed units of retirement income during the course of their working careers.

Tier IV: Mutual Fund Window — a self-directed brokerage service is provided for use by participants who want to make their own asset allocation and fund selection decisions. The window provides participants with access to numerous actively and passively managed mutual funds that are available on the brokerage provider platform. The options offered within the Mutual Fund Window are neither selected nor monitored by the Committee.

The Committee reviews the Plan’s investment structure bi-annually to determine the appropriate number and types of tiers and investment options. The review will consider the potential for participants to implement a range of investment strategies that may be appropriate for differing investment time horizons, objectives, and risk preferences. As part of its review, the Committee considers the investment and administrative fees associated with the Plan’s investment structure. The Committee is authorized to make changes to the structure as it deems necessary or advisable. The Plan’s current investment options, and the respective performance benchmarks, are listed in Addendum A: Investment Options and Benchmarks.
Investment Option Selection

The Committee considers the following Guidelines when selecting investment options to offer in the Plan:

- The investment manager should articulate the investment strategy that will be followed by the mutual fund, annuity or target date fund. This criterion shall not preclude, however, selection of a new fund without a historical track record so long as the investment strategy is well articulated.

- The fund/option should be able to provide historical (for 10 years or over the fund’s life, if shorter) quarterly performance numbers calculated on a time-weighted basis and reported net of all fees.

- The fund/option should provide volatility measurements so that an appropriate risk/return profile can be prepared.

- The fund/option should be able to provide information on its history, key personnel, fee schedules and expenses, and current investment exposure.

- The fund/option should have reasonable fees.

The above requirements and the following provisions of this Policy do not apply to mutual funds available through the brokerage window or annuities offered under the Plan that predate the adoption of this Policy and are frozen to new contributions. The Committee shall not have any responsibilities for the selection and monitoring of such investments.
**Investment Performance Objectives**

To facilitate ongoing review and evaluation of the Plan, the Committee has established performance benchmarks. The Committee reviews the performance of the investment options relative to benchmarks at least annually. The benchmarks may be changed if conditions warrant. The investment performance benchmarks for the current fund line-up are listed in Addendum A: Investment Options and Benchmarks.

**Capital Preservation Funds:**

The primary objective of a capital preservation fund (i.e., money market, stable value) is to preserve capital while producing returns consistent with this objective.

**Passively Managed Funds (Index Funds):**

The primary objective of passively managed funds is to produce annualized returns within ± 20 basis points of its benchmark index for domestic equity funds and ± 30 basis points for international index, fixed income and target date funds.

**Actively Managed Funds:**

The primary objective of actively managed funds is to exceed the results of a representative broad market index, while maintaining an appropriate level of volatility. The investment return of the funds will be evaluated against a universe of similar managers for similar asset classes. Performance will be evaluated with a perspective toward a three- to five-year period on an after fee basis.
Evaluation and Review

The Committee reviews actual investment results achieved by its investment funds to determine whether:

- The investment fund adhered to its stated investment style and market capitalization classifications;
- The investment fund performed in a manner consistent with its stated investment approach; and
- The investment fund performed satisfactorily when compared with stated objectives (relative to indices and where applicable, peer groups).

Among the events the Committee may examine in its review are:

- Performance below that of objectives over the majority of rolling three-year periods measured; longer period performance will be taken into account as appropriate.
- Performance substantially below that of objectives over a shorter period of time (e.g., one year);
- Significant changes in the portfolio composition that would constitute a change in investment objective;
- The departure of one or more key investment professionals;
- Violation of an investment guideline;
- A change in ownership or control of the investment management organization; and
- An expense ratio that becomes unreasonable.

For the Target Retirement Funds, the Committee will periodically consider the appropriateness of the asset allocation “glide path”. The asset classes employed and their weighting will be evaluated to ensure they are consistent with the investment objectives of the applicable retirement date.

In addition to the criteria described above, the financial stability of the Plan’s annuity provider(s) will be periodically evaluated from the available public information. The review may consider factors such as the following:

- Creditworthiness as determined by third-party credit rating organizations;
- Solvency as represented by financial, or capital-adequacy ratios; and
- Any legal and/or regulatory agency proceedings affecting the Investment fund or the annuity provider.

Taking into account this periodic evaluation and review and such other factors the Committee deems appropriate, the Committee has the right, in its sole discretion, to add or terminate an investment option at any time and for any reason. In the event the Committee decides to terminate an investment option, its alternatives include, without limitation, the following:

- Removing the investment option, replacing the investment option with a new alternative investment option and moving assets formerly invested in the terminated investment option to the new alternative investment option.

- Removing the investment option and moving assets formerly invested in the terminated investment option to an existing similar investment option or the Plan’s default investment option.

- Freezing new contributions that are invested in an investment option and directing new assets to a replacement investment option.

- Phasing out the investment option over a specific time period.
## Addendum A: Investment Options and Benchmarks (as of April 2023)

<table>
<thead>
<tr>
<th>Investment Option</th>
<th>Ticker</th>
<th>Active/Passive</th>
<th>Market Index Benchmark</th>
<th>Peer Group</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Tier 1: Target Date Funds Series</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Vanguard Target Retirement Series</td>
<td>Various</td>
<td>P</td>
<td>Custom</td>
<td>Mixed Asset Target (Passive)</td>
</tr>
<tr>
<td><strong>Tier 2: Core Funds - Passively Managed</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Vanguard Total Bond Market Index Instl Plus</td>
<td>VBMPX</td>
<td>P</td>
<td>Custom</td>
<td>Fixed Income Mutual Funds</td>
</tr>
<tr>
<td>Vanguard Institutional Index Instl Plus</td>
<td>VIIIX</td>
<td>P</td>
<td>S&amp;P 500 Index</td>
<td>US Large Cap Core Equity Mutual Funds (Passive)</td>
</tr>
<tr>
<td>Vanguard Extended Market Index Instl Plus</td>
<td>VEMPX</td>
<td>P</td>
<td>Custom</td>
<td>SMID Cap Core Equity Mutual Funds (Passive)</td>
</tr>
<tr>
<td>Vanguard Total International Stock Instl Plus</td>
<td>VTPSX</td>
<td>P</td>
<td>Custom</td>
<td>International Equity Mutual Funds</td>
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<tr>
<td>Vanguard Total World Stock Index Instl</td>
<td>VTWIX</td>
<td>P</td>
<td>Custom</td>
<td>Global Equity Mutual Funds</td>
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<td><strong>Tier 2: Core Funds - Actively Managed</strong></td>
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<td></td>
<td></td>
<td></td>
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<tr>
<td>Vanguard Federal Money Market Fund</td>
<td>VMFXX</td>
<td>A</td>
<td>90 Day U.S. Treasury Bill</td>
<td>Money Market Mutual Funds</td>
</tr>
<tr>
<td>PIMCO Total Return Fund Institutional Funds</td>
<td>PTTRX</td>
<td>A</td>
<td>Barclays Aggregate Bond Index</td>
<td>Core Fixed Income Mutual Funds</td>
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<tr>
<td>PIMCO Inflation Responsive Multi-Asset Fund Instl/PIRMX</td>
<td>A</td>
<td>Custom Benchmark</td>
<td></td>
<td>N/A</td>
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<tr>
<td>T. Rowe Price Inst Large Cap Growth Fund</td>
<td>TRLGX</td>
<td>A</td>
<td>Russell 1000 Growth Index</td>
<td>Large Cap Growth Mutual Funds</td>
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<tr>
<td>T. Rowe Price Inst Large Cap Value Fund</td>
<td>TILCX</td>
<td>A</td>
<td>Russell 1000 Value Index</td>
<td>Large Cap Value Mutual Funds</td>
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<tr>
<td>Lord Abbett Developing Growth Fund Class R6</td>
<td>LADVX</td>
<td>A</td>
<td>Russell 2000 Growth Index</td>
<td>SMID Cap Growth Funds</td>
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<td>MFS Institutional International Equity Fund</td>
<td>MIEIX</td>
<td>A</td>
<td>MSCI EAFE Index</td>
<td>International Equity Mutual Funds</td>
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<td>BNY Mellon Global Stock Fund Class Y</td>
<td>DGLYX</td>
<td>A</td>
<td>MSCI World Index</td>
<td>Global Equity Mutual Funds</td>
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<td><strong>Tier 3: Annuities</strong></td>
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<td>TIAA Traditional</td>
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<td>5-Year Constant Maturity Treasuries</td>
<td>Stable Value Funds</td>
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<td><strong>Tier 4: Self-Directed Brokerage Account</strong></td>
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<td></td>
<td>Custom</td>
<td>N/A</td>
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</tbody>
</table>

1 Custom Benchmark: 45% TIPS, 20% Commodities; 10% REITs; 10% Local EM Debt; 10% Precious Metals.