



American Endowment Foundation Statement of Investment Objectives and Guidelines - Revision July 12, 2013

I. Scope

This Statement of Investment Objectives and Guidelines is intended to establish guidelines that will govern the investment activities of American Endowment Foundation ("AEF") and Registered Investment Advisors ("Investment Manager") in a managed account relationship.

II. The Board of Directors of AEF

AEF's Board of Directors has ultimate responsibility for the investment of the foundation's assets. More specifically, the Board, as required by IRS regulations and provided in AEF's Code of Regulations, has certain responsibilities concerning its relationships with Investment Managers. In carrying out these responsibilities, the Board is committed to obtain information and take other appropriate steps with the view of seeing that each Investment Manager operates in accordance with the terms of AEF's Code of Regulations and accepted standards of fiduciary conduct to produce a reasonable rate of return, with due regard to safety of principal. AEF's Board is also required to replace any Investment Manager for breach of fiduciary duty under State law, or failure to produce a reasonable rate of return over a reasonable period of time as determined by the Board.

III. President

The President shall have responsibility for: (i) formulating investment strategies, (ii) authorizing the acquisition and/or disposition of investments, (iii) monitoring the portfolio for compliance with the approved policies and guidelines, and (iv) reporting to the Board of Directors on all material matters relating to the portfolio.

The President is empowered to appoint Investment Managers to manage assets and/or to provide investment advice regarding such assets. Only the President can approve a written request of an Investment Manager to deviate from this policy. The President shall report all material deviations at the next regular meeting of the Board of Directors.

IV. Investment Manager(s)

An Investment Manager shall be classified either as follows:

- A. Non Discretionary Advisor** - The advisor does not have discretionary trading authority. Purchases and sales of securities can only be made with AEF's prior authorization and within AEF's Statement of Investment Objectives and Guidelines and the Advisor's Investment Advisory Agreement.

Specific responsibilities of a Non Discretionary Manager include:

- 1) Providing advice to AEF regarding investment strategy within AEF's Statement of Investment Objectives and Guidelines and the Advisor's Investment Advisory Agreement.
- 2) Monitoring and reviewing the Fund on an ongoing basis and recommending changes to the securities held within the Fund.
- 3) Providing summary comments, as required by AEF, on investment performance results of the Fund.
- 4) Communicating any investment strategy or major changes in investment strategy, or any other factors that may affect investment objectives established by AEF.
- 5) Informing AEF of any qualitative change in the investment management organization. Examples include changes in portfolio management personnel, ownership structure, investment philosophy, etc.
- 6) Voting proxies on behalf of AEF.
- 7) Meeting annually, or more frequently if circumstances dictate, in person or by teleconference call, to review the Fund's status and long term performance and to inquire whether anything has changed in the Fund's financial situation or investment objective that might affect the manner in which assets in the Fund are managed.

B. **Discretionary Manager** - AEF authorizes the Advisor as its agent to manage the account in such manner as the Advisor may deem advisable within AEF's Statement of Investment Objectives and Guidelines and the Advisor's Investment Advisory Agreement.

Specific responsibilities of a Discretionary Manager include:

- 1) Providing advice to AEF regarding investment strategy within AEF's Statement of Investment Objectives and Guidelines and the Advisor's Investment Advisory Agreement.
- 2) Monitoring and reviewing the Fund on an ongoing basis and implementing changes to the securities held within the Fund as the Advisor deems advisable.
- 3) Providing summary comments, as required by AEF, on investment performance results of the Fund.
- 4) Informing AEF of any qualitative change in the investment management organization. Examples include changes in portfolio management personnel, ownership structure, investment philosophy, etc.
- 5) Voting proxies on behalf of AEF.
- 6) Meeting annually or more frequently if circumstances dictate, in person or by teleconference call, to review the Fund's status and long term performance and to inquire whether anything has changed in the fund's financial situation or investment objective that might affect the manner in which assets in the Fund are managed.

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V. General Investment Principles

Investments shall be made solely in the best interest of AEF and consistent with the guidelines and objectives established by the President, and approved by AEF's Board of Directors and the Advisor's Investment Advisory Agreement.

- 1) Each managed account shall be invested with the care, skill, prudence, and diligence under the prevailing circumstances that a prudent person in a like position would exercise under similar circumstances and in a manner the President reasonably believes to be in the best interest of AEF.
- 2) Investment of AEF assets shall generally be diversified so as to minimize the risk of large losses.
- 3) Cash is to be employed productively at all times, by investment in short-term cash equivalents to provide safety, liquidity and return.

VI. Investment Objectives

AEF's primary investment objective for segregated investment accounts shall be to strive to achieve a five-year rate of return, adjusted for additions, withdrawals and investment management expense, that is at least Four (4.0) percent greater than inflation, as expressed in the Consumer Price Index. In addition, assets shall be managed in such a manner that reflects AEF's grant-making and other liquidity needs.

It is recognized the rate of return target may be difficult to attain in every five-year period, but should be attainable over a majority of five-year periods.

VII. Volatility of Returns

AEF recognizes that in order to achieve its investment objectives, managed portfolios will experience volatility of returns and fluctuations in market value.

VIII. Asset Allocation

AEF recognizes that the prime factor influencing the risk, and ultimately the performance of a Fund's investments is the allocation of assets between equities securities and fixed-income securities. Equity securities will generally comprise a range of up to 100%, and no less than 50% of invested assets.

IX. Marketability of Assets

AEF generally requires that the majority of its assets shall be invested in liquid, publicly traded securities, subject to the exception process described in the Statement of Investment Objectives and Guidelines. Exceptions may be approved in writing by the President, in advance of the investment, providing that the Investment Manager presents a detailed investment plan. Liquid securities are those that can be traded quickly and efficiently on behalf of AEF free of significant liquidation penalties or fees and with minimal impact on market price.

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X. Investment Guidelines

It is AEF's intention not to employ market-timing techniques and not to experience high portfolio turnover rates. An Investment Manager may petition AEF for its approval of exceptions to these guidelines, including those items prohibited by Paragraph 2 of the Article X. The President is hereby authorized to approve the investment of assets in any investment including those prohibited by Paragraph 2 of this Article X.

The following boundaries apply to the investment of AEF assets:

- 1) Specifically allowable investments:
 - a) Cash equivalents including treasury bills, money market funds, commercial paper, repurchase agreements, certificates of deposit, and interest-bearing checking and savings accounts.
 - b) Publicly traded domestic and international equities and fixed-income securities including common stocks, bonds notes, preferred stocks, mortgage-backed securities, and American Depository Receipts of non-U.S. companies.
 - c) Mutual funds which invest primarily in securities that are allowed in this Statement.
 - d) Real estate investment trusts.
 - e) Exchange traded funds.
 - f) Covered calls.
 - g) Hedge Funds

- 2) Specifically disallowed investments or investment practices (without prior, written approval from the President):
 - a) Debt financed investments, including margin purchases.
 - b) Short-selling.
 - c) Derivative securities, including options and futures contracts.
 - d) Restricted stock.
 - e) Stock of closely held companies.
 - f) Real estate.
 - g) Partnership interests.
 - h) Loans to individuals or businesses (except specifically allowed fixed income securities as previously defined).
 - i) Artwork.
 - j) Municipal bonds and other tax-exempt securities.
 - k) Other non-marketable, hard-to-value assets.
 - l) Variable annuities.

Each Investment Manager is responsible for advising the President of any restriction within this Statement that prevents the investment program from obtaining the objectives and goals set forth herein.

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XI. Safekeeping and Custody

All securities purchased by each Investment Manager shall be held in a safekeeping account with a reputable and insured custodial institution.

XII. Performance Review and Evaluation

AEF will provide performance information to the investment manager at least annually after the end of the calendar year. Investment performance will be calculated on a net total rate of return basis that takes into consideration dividend and interest income, changes in market value and investment management fees. The investment return on each Fund will be measured against AEF's primary benchmark (CPI plus 4.0%), and AEF's Composite Market Index, assuming a 60%/ 40% allocation with 60% invested in the S & P 500 Index and 40% invested in the Barclay Aggregate Bond Index. Comparisons will show results for the previous one-, three-, and five-year time periods, as available. AEF will also provide information on performance of AEF's investment manager universe.

In exercising its fiduciary responsibilities, AEF reserves the right to terminate an Investment Manager for the following reasons:

- 1) Investment performance which shows a pattern of significant underperformance over the long term (five-year and three-year time period as available) relative to AEF's benchmarks.
- 2) Failure to adhere in a material way to this Statement of Investment Objectives and Guidelines, including communication and reporting requirements.
- 3) Significant qualitative changes to the investment management organization.

The President shall review the performance of each Investment Manager at least annually. The President shall submit a written summary of the annual investment review to AEF's Board of Directors at a regularly scheduled Board Meeting.

XII. Investment Policy Review

To ensure continued relevance of the guidelines, objectives, financial status and capital markets expectations as established in this Statement, the Board intends to review this Statement of Investment Objectives and Guidelines annually.