



---

# Commission Meeting Agenda

Thursday, April 16, 2026 at 9:30 a.m.

RSIC Presentation Center and Streaming Online at [www.rsic.sc.gov](http://www.rsic.sc.gov)

- I. Call to Order and Consent Agenda
  - A. Adoption of Proposed Agenda
  - B. Approval of March 2026 Minutes
- II. Chair's Report
- III. CEO's Report
  - A. Consolidated Annual Investment Plan and Statement of Investment Objectives and Policies – Approval
- IV. Delegated Investment Report
- V. Executive Session to discuss investment matters, including comprehensive review of the bond and portable alpha portfolios' performance and a discussion of various underlying holdings, and certain portions of the Consolidated Annual Investment Plan and Statement of Investment Objectives and Policies, pursuant to S.C. Code Sections 9-16-80 and 9-16-320; to discuss personnel matters and to receive advice from legal counsel pursuant to S.C. Code Section 30-4-70(a)(1)-(2).
- VI. Potential Actions Resulting from Executive Session
- VII. Adjourn

#### NOTICE OF PUBLIC MEETING

*This notice is given to meet the requirements of the S.C. Freedom of Information Act and the Americans with Disabilities Act. Furthermore, this facility is accessible to individuals with disabilities, and special accommodations will be provided if requested in advance.*

# South Carolina Retirement System Investment Commission Meeting Minutes

**Date and Time: March 5, 2026 9:30am Meeting**

**Location:**

**1201 Main Street, 15<sup>th</sup> Floor, Ste. 1510, Columbia, South Carolina 29201 & Streaming Online at  
[www.rsic.sc.gov](http://www.rsic.sc.gov)**

**Commissioners Present:**

Mr. William Hancock, Chair  
Ms. Melissa Schumpert, Vice-Chair  
(via telephone)  
Ms. Peggy Boykin, PEBA Executive  
Director (absent)  
Mr. William J. Condon, Jr.  
Mr. Kenneth F. Deon  
Dr. Holley H. Ulbrich  
Mr. Dan Roach  
Mr. Bill Comer

**I. Call to Order and Consent Agenda**

Chair William H. Hancock called the meeting of the South Carolina Retirement System Investment Commission (“Commission” or “RSIC”) to order at 9:30 a.m. Dr. Holley H. Ulbrich made a motion to adopt the agenda as presented. Mr. Kenneth F. Deon seconded the motion, which was unanimously approved.

Mr. Deon then made a motion to approve the minutes of the Commission’s December 11, 2025, meeting. Dr. Ulbrich seconded the motion, which was unanimously approved.

A link to the entire meeting is below:

[2026\\_03\\_05\\_Commission\\_Meeting](#)

## II. Actuarial Update – GRS Actuarial Consultants

Mr. Michael R. Hitchcock, Chief Executive Officer (“CEO”) recognized Mr. Joe Newton and Mr. Danny White of GRS Actuarial Consultants (“GRS”), the actuaries for the South Carolina Retirement System (“SCRS”) to provide an update on actuarial valuations as of July 1, 2025. Mr. White began the presentation with a summary of historical membership demographics for SCRS. He then presented a summary of the 2025 valuations and salary increases for both SCRS and the Police Officers Retirement System of South Carolina (“PORS”). Mr. Newton discussed the historical and projected asset liabilities for SCRS. He also noted that in the near future the South Carolina Public Employee Benefit Authority (“PEBA”), the Commission and GRS should begin to develop policy to establish the criteria to reduce contribution rates once the Plan reaches an 85 percent funded status. After additional discussion with the Commissioners, GRS concluded their report.

A link to the presentation given by GRS is below:

[00:01:20](#)

## III. Verus 2026 Capital Market Expectations

Mr. Hitchcock then introduced Mr. Mark Brubaker and Ian Toner from Verus Advisory, Inc. (“Verus”), to present Verus’ 2026 10-year capital market assumptions and expectations. Mr. Brubaker explained that Verus formally updates its capital market assumptions annually but also makes quarterly updates to reflect changes in market conditions over the course of a year. Mr. Toner began by reviewing the accuracy of Verus’ 2025 expectations. He then provided ten thoughts for 2026 covering topics including inflation, interest rates, expected policy changes and the broader economy. He then proceeded to discuss Verus’ methodology and 10-year return and risk assumptions. Lastly, Mr. Toner explained the range of likely 10-year outcomes and equity return forecasts. Hearing no questions, Mr. Toner concluded his report.

A link to the presentation given by Verus Advisory is below:

[00:36:29](#)

## IV. CEO’s Report

Chair Hancock recognized Mr. Hitchcock for the CEO’s report. Mr. Hitchcock began by reviewing the proposed Consolidated Annual Investment Plan and Statement of Investment Objectives and Policies (“AIP/SIOP”). He noted that he would be presenting a summary of the proposed changes and that the Commission would vote on the proposed AIP/SIOP at the April 2026 Commission meeting to ensure compliance with the May 1st statutory deadline. He noted that most of the proposed amendments were technical with

few substantive changes. Mr. Hitchcock then reviewed the proposed amendments with the Commission and requested questions or feedback from the Commissioners prior to the April 2026 meeting.

A link to the discussion is below:

[01:12:52](#)

## V. CIO's Report

Next, Chair Hancock introduced Mr. Bryan Moore, Chief Investment Officer ("CIO"), to present the investment performance review for the period ending December 31, 2025.

Mr. Moore reported that long-term performance remained above the Policy Benchmark and consistent with Plan objectives, while short-term performance for the fiscal year-to-date was below the Policy Benchmark, as shown below:

Executive Summary as of December 31, 2025						
Plan Market Value in Millions of Dollars: \$53,914						
Metrics by Time Period	Quarter	Fiscal Year to Date	1 Year	3 Years	5 Years	10 Years
Total Plan	2.39%	6.79%	14.45%	11.88%	9.04%	8.68%
Policy Benchmark	2.33%	7.23%	14.04%	11.26%	7.12%	8.00%
Excess Return (%)	0.06%	-0.44%	0.41%	0.63%	1.93%	0.68%
Excess Return (\$)	\$33	-\$212	\$220	\$881	\$4,621	\$3,184
Net Benefit Payments (\$)	\$9	\$140	\$251	\$447	-\$608	-\$5,258
Percentage performance metrics are annualized for periods greater than 1 Year.						

He also reviewed asset class performance, attribution, and portfolio risk, and presented a framework for reviewing the portfolio with the Commission going forward, along with considerations regarding portfolio positioning and risk.

The Commission discussed portfolio performance and related matters. There being no further questions, the report was concluded.

A link to the CIO's report is below:

[01:31:41](#)

## VI. Delegated Investment Report

Chair Hancock then recognized Mr. Moore for the delegated investment report. The following delegated investments were closed by Staff since the December 11, 2025, Commission meeting.

Delegated Investments (December 11, 2025 to March 4, 2026)
--

Asset Class	Investment	Investment Amount	RSIC Commitment Date
Private Equity	Strategic Partners X	\$250 M	December 31, 2025
Real Assets	Basalt Infrastructure Partners Fund V	\$200 M	January 29, 2026
Real Assets	TA Realty-SC	Up to 1% of Total Plan Assets (\$526,4700,000)	February 16, 2026
Private Equity	Francisco Partners VIII	\$150 M	February 23, 2026
Private Equity	Francisco Partners Agility IV	\$50 M	February 23, 2026

#### **VII. Executive Session**

Dr. Ulbrich made a motion to recede into Executive Session to discuss investment matters, including the real asset portfolio's performance and a discussion of various underlying holdings, and certain portions of the Consolidated Annual Investment Plan and Statement of Investment Objectives and Policies, pursuant to S.C. Code Sections 9-16-80 and 9-16-320; to discuss personnel matters pursuant to S.C. Code Section 30-4-70(a)(1); and to receive advice from legal counsel pursuant to S.C. Code Section 30-4-70(a)(2). Mr. Deon seconded the motion, which was approved unanimously. The Commission receded into executive session at 11:33 a.m.

#### **VIII. Potential Action Resulting from Executive Session**

Upon return to open session, Chair Hancock noted that the Commission did not take any action while in executive session.

#### **IX. Adjournment**

There being no further business, the Commission adjourned by unanimous consent after exiting from executive session.

[Staff Note: In compliance with S.C. Code Section 30-4-80, public notice of and the agenda for this meeting were delivered to the press and to parties who requested notice and were posted at the entrance, in the lobbies, and near the 15th Floor Presentation Center at 1201 Main Street, Columbia, S.C., by 9:11 a.m., on March 3, 2026.]

**SOUTH CAROLINA  
RETIREMENT SYSTEM INVESTMENT COMMISSION**



**CONSOLIDATED ANNUAL INVESTMENT PLAN  
AND  
STATEMENT OF INVESTMENT OBJECTIVES AND  
POLICIES**

Effective July 1, 202~~6~~<sup>5</sup>

## Role of this Document

The State of South Carolina administers five defined benefit pension plans: the South Carolina Retirement System (“SCRS”), the Police Officers Retirement System (“PORS”), the Retirement System for Members of the General Assembly (“GARS”), the Retirement System for Judges and Solicitors (“JSRS”), and the South Carolina National Guard Supplemental Plan (“SCNG”) (together, the “Plan”).

The South Carolina General Assembly established the Retirement System Investment Commission (“RSIC”) as a state agency in 2005 and provided it with the exclusive authority to invest and manage the assets of the Plan which it does in one group trust. RSIC is governed by an eight-member board (the “Commission”). The Commission is a co-fiduciary of the assets of the Plan along with the South Carolina Public Employee Benefit Authority Board (“PEBA”).

State law requires the Commission to adopt a Statement of Investment Objectives and Policies (“SIOP”) and to review it annually and to either amend it or reaffirm it. The SIOP establishes investment and performance objectives, policies and guidelines, roles, responsibilities, and delegation of authority for the management of plan assets. State law also requires RSIC’s Chief Investment Officer (“CIO”) to develop an Annual Investment Plan (“AIP”) which must be presented to and adopted by the Commission prior to May 1<sup>st</sup> of each year. Pursuant to state law, relevant portions of the SIOP may constitute parts of the AIP.

In order to ensure consistency and agreement between the SIOP and AIP, the Commission has consolidated the requirements of both into one document which it will review annually prior to May 1st. As part of the annual review, the Commission will amend or reaffirm, as it deems appropriate, those portions of this document intended to meet the requirements of the SIOP and the Commission will consider the CIO’s recommendation of any necessary changes to those portions of this document intended to meet the requirements of the AIP. In order to assist the Commission and the CIO in meeting their respective annual requirements, RSIC’s Chief Executive Officer (“CEO”) will provide a guide that designates those portions of this document that are required by the SIOP and those that are required by the AIP.

This Consolidated SIOP and AIP also serves as the RSIC’s strategic plan.

The Consolidated AIP and SIOP takes effect July 1, 2026<sup>5</sup>.

## Table of Contents

I.	STRATEGIC PURPOSE, INVESTMENT OBJECTIVE, AND BELIEFS .....	4
II.	ROLES AND RESPONSIBILITIES.....	<del>109</del>
III.	ASSET ALLOCATION .....	<del>1312</del>
IV.	STRATEGIC INITIATIVES.....	<del>2019</del>
V.	INVESTMENT POLICIES .....	<del>2120</del>
VI.	INVESTMENT AUTHORITY DELEGATION POLICY .....	<del>3331</del>
VII.	SECURITIES LITIGATION POLICY (“POLICY”).....	<del>3734</del>
VIII.	PLACEMENT AGENT POLICY .....	<del>4138</del>
IX.	SUDAN DIVESTMENT POLICY .....	<del>4441</del>
X.	LONG-TERM ANNUALIZED RETURN AND VOLATILITY EXPECTATIONS (VERUS 2025) .....	<del>4845</del>
XI.	ASSET ALLOCATION HISTORY.....	<del>4946</del>
XII.	TABLES 1 AND 2 (PRIOR YEAR VERSIONS) .....	<del>5653</del>

## I. STRATEGIC PURPOSE, INVESTMENT OBJECTIVE, AND BELIEFS

### A. PURPOSE

The goal of the State's five defined benefit plans is to provide a lifetime of benefits in retirement to those who have dedicated a career of public service to the State and its political subdivisions. The funding to secure this promise of benefits comes from two sources - contributions made by the employee and employer and the investment return earned on the assets of the Plan. The General Assembly has provided the Retirement System Investment Commission with the sole authority to invest and manage the assets of the Plan. Thus, RSIC's purpose is to earn an investment return that aids in fulfilling the promise of benefit payments to our current and future retirees and their beneficiaries.

### B. INVESTMENT OBJECTIVE

RSIC's primary investment objective is to design an investment program that produces a long-term rate of return that when added to contributions, funds current and future benefit payments. In doing so, RSIC must remain mindful that the Commissioners, CEO, and CIO are named fiduciaries to the Plan's active employees, retirees, and their beneficiaries (collectively "beneficiaries"). The Plan's fiduciaries must carry out their respective responsibilities to invest and manage the Plan's assets solely in the interest of the Plan's beneficiaries, for the exclusive purpose of providing benefits, and in keeping with the highest duty of care the law recognizes. As a result, the return the investment program seeks to achieve should involve taking a prudent amount of investment risk.

Further, RSIC cannot design an investment program in isolation, but must instead design a program consistent with the realities of the Plan that is guided by the Plan's particular design, structure, and risk factors. An important guiding consideration is that the Plan is mature and until recently experienced net negative cash flows, in that the amount of annual contributions into the Plan were less than the annual amount of benefit payments flowing out of the Plan. It is expected that the Plan will begin experiencing net negative cash flows again in the future. As a result, the investment program must be designed in a way to provide sufficient liquidity to fund the net benefit payments to current retirees.

The investment program also must be guided by the consideration that the respective systems comprising the Plan are underfunded, in that the discounted liabilities of each system exceed the actuarial value of each system's assets. The 2025<sup>4</sup> Actuarial Valuation report from the Plan's actuaries shows the funded status of each system as:

SCRS	PORS	GARS	JSRS	SCNG
<u>63.459.6%</u>	<u>7168.3%</u>	<u>84.174.3%</u>	<u>52.248.7%</u>	<u>7567.5%</u>

The underfunded nature of the Plan presents the risk that the Plan's assets will be insufficient to support future benefit payments. As a result, the investment program must also be designed in a way to grow the assets of the Plan to support payments to future retirees and their beneficiaries. The General Assembly did take significant action to address the underfunded nature of the Plan in the 2017 Pension Reform Bill. The 2017 Pension Reform Bill requires that the unfunded accrued actuarial liability ("UAAL") amortization period for SCRS and PORS be reduced by one year each fiscal year until each plan reaches a twenty-year amortization period. In order to support meeting this requirement, the General Assembly significantly increased contributions into SCRS and PORS. It should be noted that because of these efforts, the funding

levels for both SCRS and PORS improved over the prior fiscal year and the amortization periods for both SCRS and PORS have been reduced to 12 ~~14~~ and 11~~13~~ years, respectively.

Thus, RSIC is tasked with designing an investment portfolio that balances the need to provide sufficient liquidity to fund ~~current-expected~~ net negative benefit payments in the foreseeable future, while also growing the portfolio to aid in providing benefits to future retirees.

Another guiding factor is that the General Assembly has set 7 percent as the assumed annual rate of investment return on the Plan's assets. The assumed rate of return not only serves as the discount rate to determine the net present value of the Plan's liabilities, but also serves as the primary driver of the Plan's funding policy. Investment performance relative to the assumed rate of return determines whether contribution rates are sufficient to meet the funding goals and requirements of the Plan.

RSIC realizes that investment performance will not meet or exceed the assumed rate of return every year, but rather strives to construct an investment portfolio that will meet or exceed this rate of return over time at a prudent level of market risk, in keeping with its fiduciary duty to the Plan's beneficiaries. RSIC recognizes that achieving a long-term rate of return that exceeds the assumed rate requires investing the portfolio in a greater percentage of assets with relatively high expected volatility. As a result, the investment portfolio will experience greater market volatility which not only impacts the probability of the investment return exceeding the assumed rate over time, but also correspondingly impacts the probability of reaching the funded status goals of the Plan without requiring additional contribution rate increases.

As a result, RSIC works to design an investment program that maximizes the probability that the Plan will meet the General Assembly's funded status goals, but also given the high level of contribution rates, strives to minimize the probability that the Plan will need additional contributions above those already required. RSIC believes that it can design an investment program with a significant probability of meeting or making significant progress towards both concerns as demonstrated by the stochastic analysis of our funded status expectations for SCRS set out in Table 1 below and a similar analysis of our contribution rate expectations set out in Table 2 below.

Table 1 - SCRS Expected Funded Status as of 6/30/2025<sup>4</sup>

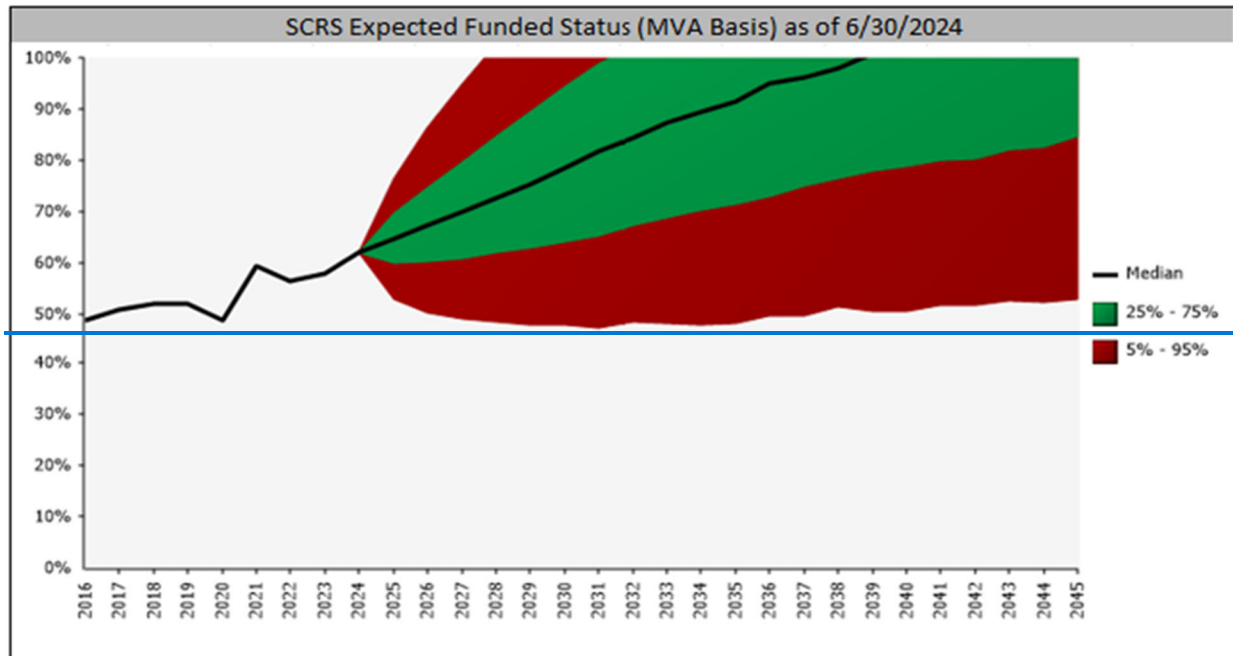
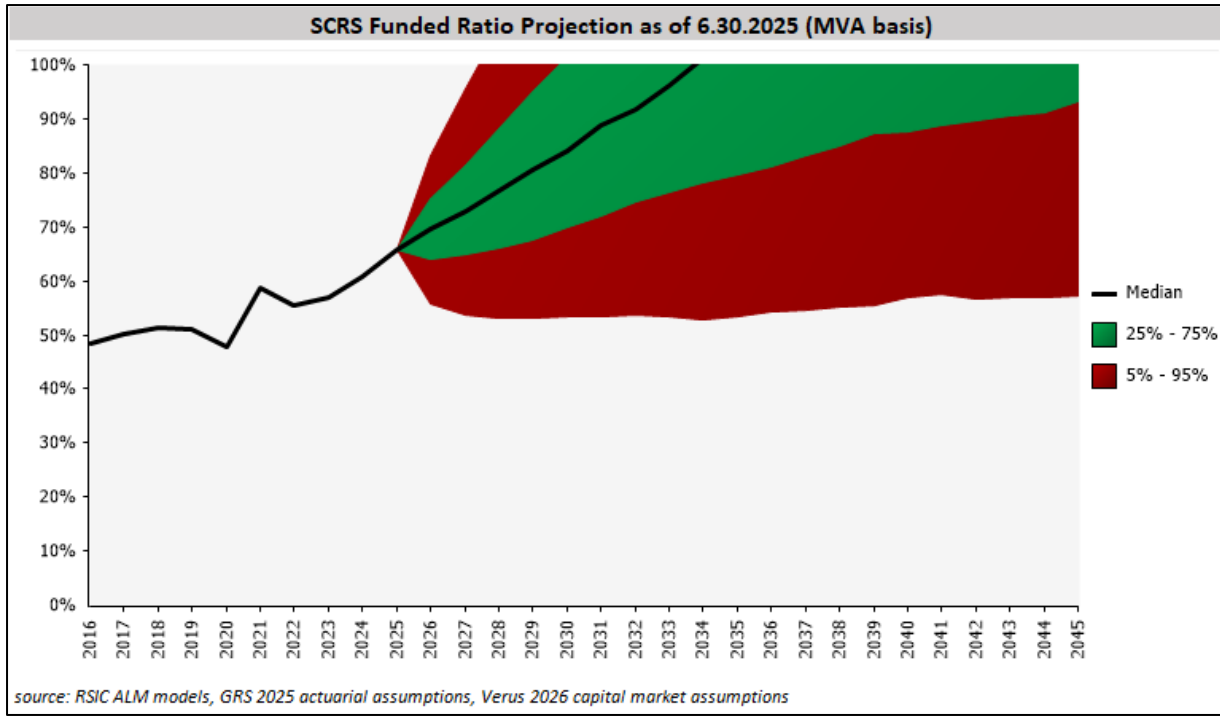


Table 1 tracks the actual, as well as expected, funded status of SCRS since 2016, the year prior to the passage of the 2017 Pension Reform Bill. SCRS is used as the example because its assets comprise the greatest percentage of the total assets of the five systems. The reason for the stochastic approach to the

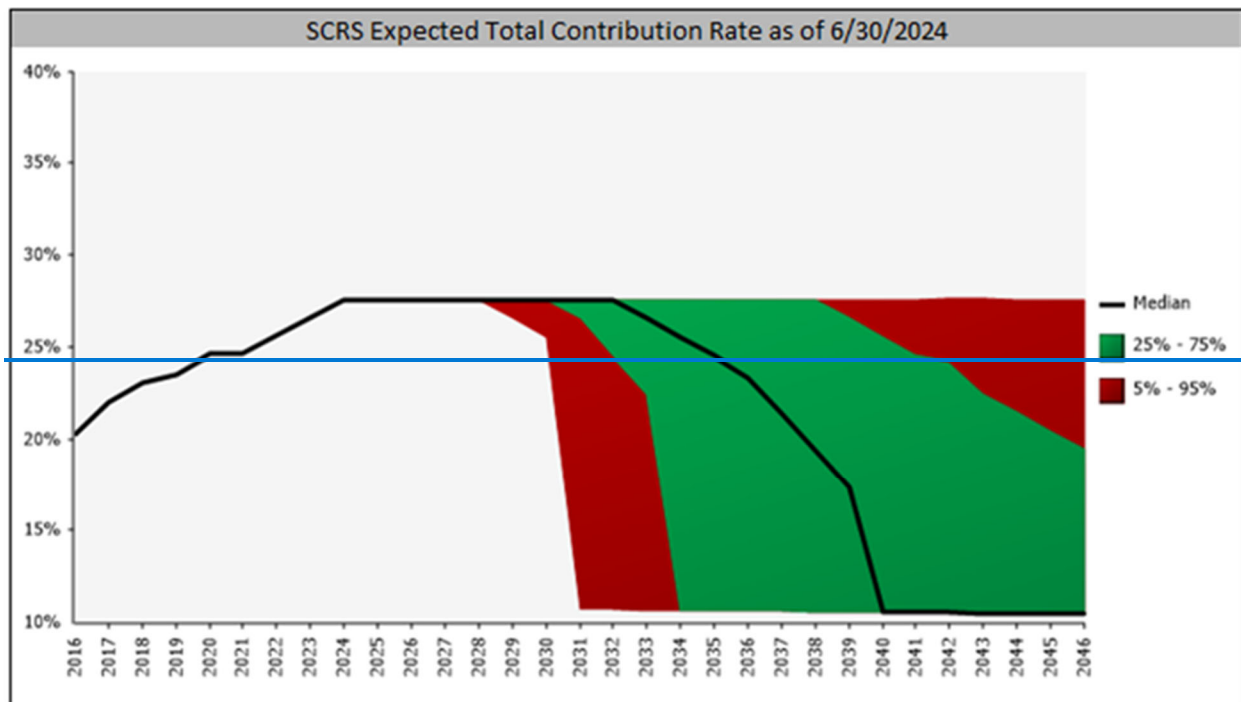
expected funded status is to demonstrate the impact of market volatility on the probable funded status of SCRS through time. The model upon which the simulation is based incorporates the actual structure, components, and assumptions of SCRS, including the contribution policy put into effect by the 2017 Pension Reform Bill. The model uses the Commission’s Policy Portfolio, described below, as the investment portfolio and includes thousands of iterations based on the 20265 long-term capital market and volatility expectations provided by the Commission’s Investment Consultant. The long-term expected return and volatility for the Policy Portfolio is discussed in Section III(D) below.

As can be seen in this table, the base case scenario is that SCRS reaches fully funded status by 20389, which is within the funded status goals set by the 2017 Pension Reform Bill. However, if the Plan were to experience the unfavorable 95th percentile scenario, the funded status of the Plan would not improve and would be expected to be in approximately the same funded position in thirty years that it is in currently.

The table also shows the actual improvement of the funded status of SCRS since 2016. The actual improvement shown on the table is attributable to additional contributions flowing into SCRS resulting from the 2017 Pension Reform Bill and better than forecasted investment returns since the bill’s passage.

In addition to this stochastic analysis, the 20254 Actuarial Valuation shows the amortization period for SCRS as 124 years, which is ~~ten nine~~ years ahead of the 2017 Pension Reform Bill’s requirement of 223 years. The PORS 20254 Actuarial Valuation ~~also~~ shows the amortization period as 113 years, which is ~~eleven ten~~ years ahead of the 2017 Pension Reform Bill’s requirement of 223 years.

Table 2 - SCRS Expected Total Contribution Rate as of 6/30/20254



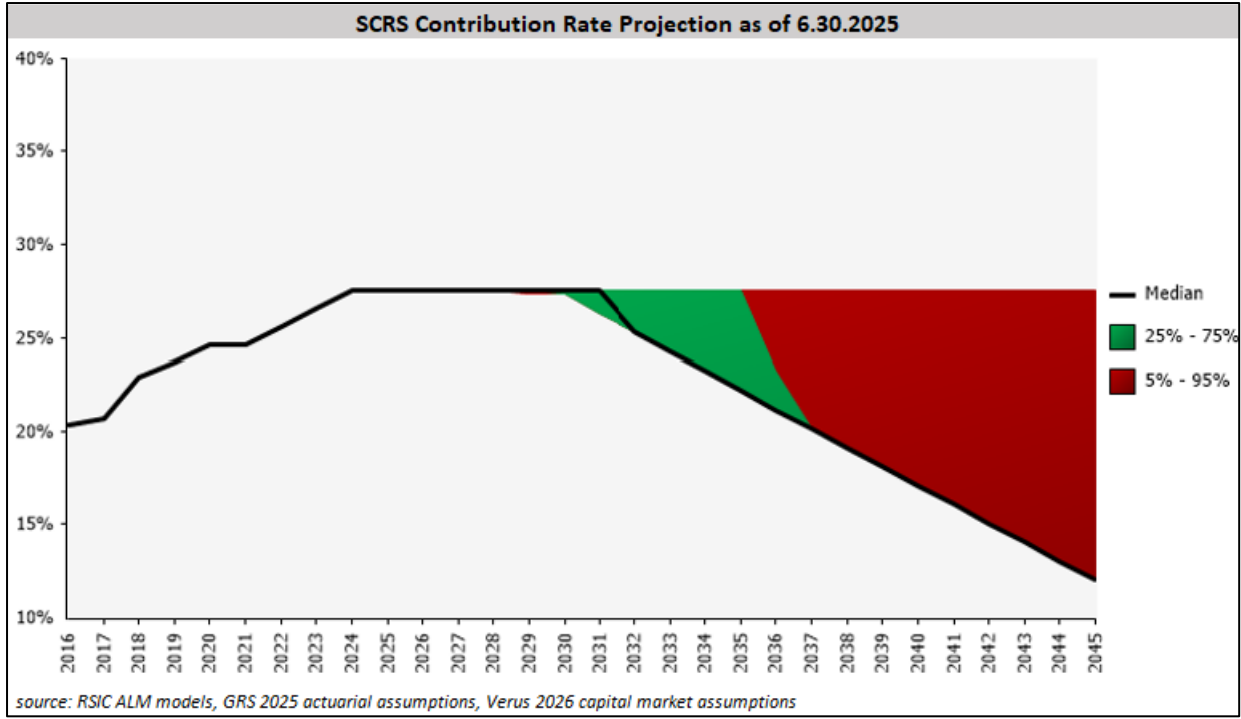


Table 2 tracks the actual, as well as expected, total employer and employee contribution rates for SCRS since 2016 and reflects that the combined contribution rate has increased to 27.56 percent pursuant to the 2017 Pension Reform Bill’s schedule. This table also employs a stochastic approach to the expected combined contribution rate to more accurately demonstrate a range of probable outcomes due to market volatility. This analysis is based on the same assumptions used to produce Table 1.

As indicated in this table, the base case scenario shows combined employer and employee contribution rates for SCRS have increased to 27.56 percent pursuant to the schedule required by the 2017 Pension Reform Bill. The Table also incorporates a sample glide path for contribution rate decreases. The sample glide path assumes that contribution rates will begin to decline by one percent per year in 2031, when the base case scenario for Table 1 reaches the 85 percent funded threshold. The 2017 Pension Reform Bill set the 85 percent threshold as the earliest point at which contributions may begin to be decreased. The sample contribution glide path is provided for example purposes only and should not be construed to predict with certainty when and how contributions will decline. However, if the Table sample glide path does reflect the actual Plan experience, then the combined contribution rate would be expected reach the 10.89 percent normal cost rate by 2045. The contribution rates are expected to begin to decline in 2033. The contribution rates are projected to decline to the 10.89 percent normal cost contribution rate by 2040. The table indicates that there is less than a five percent probability that contribution rates will need to increase above the 27.56 combined contribution rate required by the 2017 Pension Reform Bill. (Appendix XII contains historical versions of Tables 1 and 2 for each year since 2020 based on the corresponding year’s capital market expectations).

## C. BELIEFS

As fiduciaries, the Commission and staff of RSIC are charged with exercising their roles and responsibilities to the Plan's participants and beneficiaries with the highest duty of care that the law recognizes. In order to ensure consistency in approach to decision making that is commensurate with this fiduciary duty and focused on achieving the investment objective, the Commission and RSIC staff have adopted a set of core beliefs to ensure that we are collectively guided by a unifying set of principles.

### BELIEF 1

We believe that the Policy Allocation set by the Commission is the main driver of the investment portfolio's risk, return, and cost.

### BELIEF 2

We believe that investors must be rewarded for incurring additional risk, cost, and complexity.

### BELIEF 3

We believe that we are long-term investors which requires us to instill discipline and patience into our investment decision making and assessment process.

### BELIEF 4

We believe that achieving our investment objective requires an organization with strong governance, that maintains core values, and employs talented professionals.

In order to do this, we must:

1. establish a governance structure with clear lines of authority and means to assess the quality of decision making and resulting performance;
2. recruit and retain a talented investment and operational staff consistent with our Core Values of:
  - a. Humility,
  - b. Intellectual Curiosity, and
  - c. Team Player
3. achieve a deep understanding of value creation through the investment process;
4. emphasize risk awareness and focus on mitigating investment and enterprise risk; and
5. provide the foundation, infrastructure, and systems necessary to meet the investment objective and mitigate risk.

## II. ROLES AND RESPONSIBILITIES

1. In 2005, RSIC was established by South Carolina law to invest and manage the assets of the State's five defined benefit retirement plans. RSIC invests and manages the assets of all five plans in one group trust. RSIC is governed by an eight-member Commission. The Commission's primary purpose is to set the strategic direction for an investment program that is consistent with its fiduciary duty and strives to earn an investment return that when combined with contributions fulfills the promise of benefit payments to the Plan's current and future retirees and their beneficiaries. This includes setting a long-term strategic asset allocation that meets the Commission's investment objective, oversight of the implementation of the investment portfolio and the business affairs of RSIC, approving certain investments, ensuring legal and ethical integrity, and maintaining accountability. The Commission also adopts a series of governance policies that define the roles and responsibilities of Commissioners and staff and provide general guidance for the operation of RSIC as an agency. (RSIC Governance Policies can be found at <https://www.rsic.sc.gov/documents/Governance-Policy-Manual.pdf>).
2. The Commission employs a CEO, who serves as the primary figure of accountability for RSIC. The CEO serves as the chief administrative officer of RSIC as an agency and is charged with the affirmative duty to carry out the mission, policies, and directives of the Commission. The CEO is delegated the Commission's authority necessary, reasonable, and prudent to carry out the operations and management of RSIC as an agency and to implement the Commission's decisions and directives. The CEO also serves as the chief risk officer for the organization. The CEO is charged with employing a CIO and all other agency staff who serve at the will of the CEO. The CEO is also delegated the final authority to close all investments and must certify that investments made pursuant to the Commission's Investment Authority Delegation Policy meet the requirements of the policy (see Section VI for the Investment Authority Delegation Policy).
3. The CIO manages RSIC's investment functions subject to the oversight of the CEO. RSIC primarily invests Plan assets by allocating capital to external investment managers who implement specific investment strategies to provide the exposures necessary to meet the requirements of the Commission's strategic asset allocation. The Commission has implemented an Investment Authority Delegation Policy which provides the CIO with the final authority to invest with external investment managers subject to the limits of the policy. For a proposed investment that exceeds the delegation policy, the CIO determines whether the investment is presented to the Commission for final approval. The CIO is also granted certain authority to manage the implementation and exposure of the portfolio. The CIO through the management of the investment staff also oversees investment risk management, investment manager oversight, and other related activities.
4. The Executive Leadership Team ("ELT") is currently comprised of the CEO, CIO, Chief Operating Officer ("COO"), Chief Legal Officer ("CLO"), the Deputy Chief Investment Officer ("DCIO"), and Chief Human Resources Officer ("CHRO"), and serves as RSIC's primary management committee and aids the CEO in making strategic organizational and operational decisions.
5. The Internal Investment Committee ("IIC") is a committee of senior staff appointed by the CEO and is chaired by the CIO. The IIC's responsibilities are provided by the IIC Charter but the IIC is primarily responsible for serving as the committee that vets and recommends new investments to the CIO for approval and execution, or recommendation to the Commission for its approval.
6. The Commission engages a general investment consultant ("Investment Consultant"), who reports to the Commission and assists and advises the Commission on asset allocation, asset/liability study,

performance reporting, benchmarking/peer group comparisons, and general investment education and advice. The Commission Chair takes the lead in ensuring there is an effective and productive relationship between the Commission and the Investment Consultant and that the Investment Consultant has adequate clarity and direction in meeting the Commission's needs and requests. The CEO assists the Chair in managing the day-to-day relationship with the Investment Consultant and ensures effective collaboration and consultation between the Investment Consultant and RSIC staff. RSIC Staff may rely on the Consultant for data resources, external analyst inputs, and access to educational materials. The CEO may also retain specialty consultants to serve as an extension of RSIC staff in Private Equity, Private Debt, Real Estate, Infrastructure, and Hedge Funds.

7. The Internal Audit function is governed by the Commission's Audit and Enterprise Risk Management Committee and is primarily provided through external service providers. An internal staff member coordinates the relationship with external service providers and assists the committee with performing its duties and functions. The purpose of the Internal Audit function is to provide independent, objective assurance and recommendations designed to add value and improve RSIC operations. [Internal Audit](#) assists the entity in accomplishing its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.

8. The Enterprise Risk Management and Compliance ("ERM and Compliance") function reports to the CEO and serves as the primary staff to aid the CEO in fulfilling the role of chief risk officer. The ERM and Compliance function coordinates with the ELT and other staff on the assessment of, and provides oversight related to the identification and evaluation of, major strategic, operational, regulatory, informational, and external risks inherent in the business of RSIC. ERM and Compliance is also responsible for overseeing the process for monitoring compliance with RSIC policies and applicable laws.

9. The Public Employee Benefit Authority ("PEBA") is a separate agency that administers a comprehensive program of retirement benefits, performing fiduciary duties as stewards of the contributions and disbursements for the Plan. PEBA is responsible for producing GAAP basis financial statements for the Plan and maintains a general ledger to support that process. The financial statements that are produced by PEBA contain information regarding the investments made by [RSIC the Commission](#) and as such contain the official accounting records for Plan investments. The financial statements are presented in accordance with GAAP and comply with the Governmental Accounting Standards Board standards. The financial statements are audited annually by an independent audit firm hired by the State Auditor's Office.

10. The Commission and the PEBA Board serve as co-trustees of the Plan's assets. PEBA is the custodian of the Plan's assets and RSIC is responsible for the Plan's custodial banking relationship.

11. Subject to the approval of the State Fiscal Accountability Authority, PEBA designates the Plan's Actuary. The Commission is a third-party beneficiary to the contract with the Plan's Actuary, with full rights to all actuarial valuations prepared by the actuary.

12. The South Carolina General Assembly has the authority to control the budget and staffing for RSIC and to set the actuarial annual assumed rate of return for the Plan. Starting in early 2021, and every four years thereafter, in consultation with the Commission and the Retirement System's Actuary, PEBA proposed a 7 percent assumed annual rate of return to the General Assembly that took effect at the beginning of the 2021-2022 fiscal year because the General Assembly took no action to amend or reject the recommendation. The General Assembly also conducts periodic legislative oversight [hearings](#) of RSIC.



### III. ASSET ALLOCATION

#### A. PURPOSE

The Commission's primary responsibility is to establish an investment program that is designed to meet the Commission's investment objective. The most significant action the Commission takes in fulfilling this responsibility is by setting the long-term strategic asset allocation. The Commission adopts a diversified portfolio that it expects to generate a long-term rate of return that meets its investment objective which is conditioned by its fiduciary duty to only expose the Plan's assets to a prudent level of market risk. The strategic asset allocation the Commission adopts is referred to as the Policy Portfolio. The Policy Portfolio is established with a long-term perspective and the Commission does not expect to change this portfolio to react to short-term market conditions or frequent fluctuations in capital market expectations.

The Commission recognizes employing a long-term perspective discourages the temptation to react to short-term market trends. This can help an investor to avoid chasing returns in asset classes that have become expensive due to recent appreciation. The Commission believes that adherence to this disciplined, long-term perspective will produce its greatest benefits in periods of adverse market conditions. During these times the Policy Portfolio will serve as a stabilizing force for the investment program.

State law also requires the Commission to diversify the assets of the investment portfolio and to consider: (i) general economic conditions; (ii) the possible effect of inflation or deflation; (iii) the role that each investment or course of action plays within the overall portfolio; (iv) the needs for liquidity, regularity of income, and preservation or appreciation of capital; and (v) the adequacy of funding for the Plan based on reasonable actuarial factors.

The Commission undertook a significant strategic asset allocation review in 2019-2020 with the goal of establishing a more simplified and effective Policy Portfolio. A synopsis of this review can be found in Section XI below. As a result of the review, the Commission adopted the Policy Portfolio in Table 3.

*Table 3 - Policy Portfolio Asset Class Weights as Adopted 2019-2020*

Asset Class	Weight
Public Equity	46%
Bonds	26%
Private Equity	9%
Private Debt	7%
Real Assets	12%

As part of the 2019-2020 review, the Commission adopted the discipline of only comprehensively reviewing the strategic asset allocation once every five years. In Fiscal Year 2024-2025, the Commission undertook its first comprehensive strategic asset allocation review pursuant to this discipline and the results of this review are set out below.

#### B. REFERENCE PORTFOLIO

[A critical component in the Commission's process to establish the strategic asset allocation or Policy Portfolio is setting the Reference Portfolio.](#) The Reference Portfolio is a simple two asset class benchmark portfolio comprised of stocks and bonds that serves as a risk reference for the Policy Portfolio. The

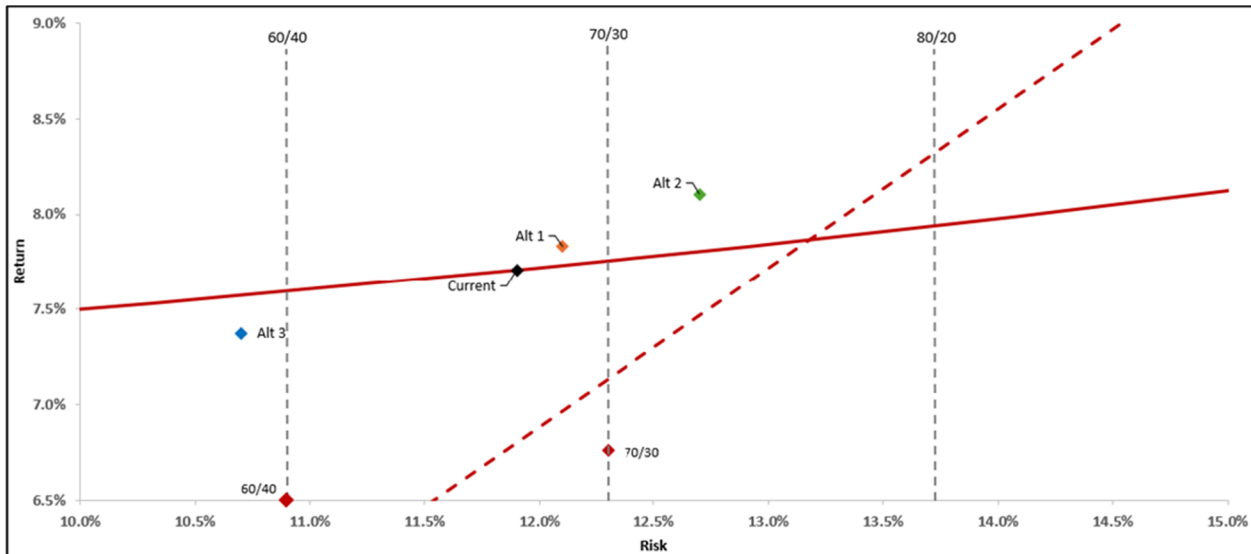
Reference Portfolio does not serve as a risk limit for the Policy Portfolio, but rather as a risk barometer to show the value of diversifying the Policy Portfolio into additional asset classes.

During its Fiscal Year 2024-2025 asset allocation review, the Commission was guided by the analysis in Table 4 below in setting the Reference Portfolio. The Commission sets the Reference Portfolio's allocation as one consistent with the expected investment risk (as expressed in expected volatility) of a diversified portfolio of assets required to earn a return that is projected to exceed the assumed annual rate of return, or above the solid red line in Table 4, while also avoiding a greater than 5 percent probability of requiring additional contributions increases in the next ten years, or to the left of the dotted red line in Table 4. By avoiding the dotted red line, the strategic asset allocation would also avoid other significant plan risks that would fall to the right of the line plotted in Table 4.

In setting the Reference Portfolio, the Commission is mindful that South Carolina law provides that no more than seventy percent of the portfolio may be invested in equities. The law does not limit the types of assets that can make up the other thirty percent of the portfolio, which could conceivably include assets like high yield bonds which have an imbedded equity risk factor. However, the Commission believed it was prudent to constrain the Reference Portfolio to no more than seventy percent equity risk, as expressed by a seventy percent allocation to equities, and to mitigate the equity risk with a thirty percent allocation to bonds.

Using Table 4 as a guide, the Commission determined that a 70 percent Global Public Equities and 30 percent U.S. Bonds portfolio best represents the investment risk required for a diversified portfolio of assets to achieve the assumed annual rate of return over time while also avoiding a greater than five percent probability that contributions would need to increase in the next ten years. As a result, the Commission reaffirmed a 70 percent Global Public Equities (MSCI ACWI IMI Net) and 30 percent Bonds (Bloomberg Barclays US Aggregate) as the Reference Portfolio.

Table 4 - Analysis Used to Determine Reference Portfolio



### C. POLICY PORTFOLIO

The Commission establishes a Policy Portfolio to serve as the Commission’s long- term strategic asset allocation. The Policy Portfolio is a multi-asset class portfolio with expected volatility similar to the Reference Portfolio. A primary benefit of aligning the Policy Portfolio’s risk target to a risk equivalent Reference Portfolio is that doing so reveals the performance impact gained through diversification. However, unlike the Reference Portfolio, the Policy Portfolio is a portfolio that could expected to be held and, in any respect, creates a presumption of simplicity for the actual portfolio and requires complexity gained through portfolio implementation and manager selection decisions to demonstrate their value.

During its Fiscal Year 2024-2025 asset allocation review, the Commission considered alternative Policy Portfolios. The expected risk and return of the then-current Policy Portfolio as well as three alternative portfolios are shown in Table 4. Alternatives 1 and 2 had increased expected return and investment risk while Alternative 3 took less investment risk and correspondingly was expected to earn less return.

The Commission adopted Alternative 1 as the new Policy Portfolio because the Commission believes that it best optimizes the expected return and risk necessary to meet its investment objective. The Commission took into consideration that Alternative 1’s expected return exceeds the assumed rate of return and that the portfolio avoids a greater than five percent probability that contribution rates will need to increase in the next ten years as shown in Table 4. The Policy Portfolio’s allocation is set out in Table 5 below.

*Table 5 -Policy Portfolio Asset Class Weights*

Asset Class	Weight
Public Equity	43%
Bonds	25%
Private Equity	12%
Private Debt	8%
Real Assets	12%

In setting the Policy Portfolio’s asset allocation, the Commission is mindful of the role each asset class plays in the overall portfolio, with each asset class performing the primary role of providing growth, diversification, or yield, as summarized below and in Table 6:

**Public Equity:** This asset class includes investments in the stock of publicly traded companies. The purpose of public equity in the portfolio is growth. The excess return expectations for this asset class are low. The asset class is highly liquid and can be accessed with minimal implementation cost.

**Bonds:** This asset class includes investments in debt securities issued by governments, corporations, or other issuers. The primary purpose of bonds in the portfolio is diversification and the secondary purpose is to provide yield. The excess return expectations for this asset class are low and the asset class is expected to provide a persistent source of return while remaining highly liquid. The asset class is also expected to serve a stabilizing function in times of market stress.

**Private Equity:** This asset class includes equity investments in privately held companies. Investors have historically been compensated with incremental return over comparable public equity investments in exchange for lower liquidity and increased business risk as compared to the public markets. The primary role of private equity in the overall portfolio is growth. Even though other asset classes are also expected

to generate persistent excess returns over time, Private Equity is expected to achieve a greater magnitude of excess return as measured over three and five -year time periods. It has a significantly higher cost of implementation as compared to public equity.

**Private Debt:** This asset class includes investments that provide alternative financing to businesses or assets and are in competition with traditional capital market or bank financing. Investors are compensated with incremental return over what can be achieved through traditional forms of lending in exchange for lower liquidity as compared to liquid credit markets and for serving as a solutions provider to these businesses. The primary role of this asset class in the portfolio is yield. Private Debt is expected to achieve a more consistent three-year excess return over its public market benchmark.

**Real Assets:** This asset class includes investments in physical assets like real property and infrastructure, as opposed to financial assets like stocks and bonds. The primary role of this asset class is diversification with the secondary purposes of providing inflation protection and yield. The asset class is expected to offer limited liquidity and greater consistency of excess return over three-year periods.

*Table 6 - Roles and Expectations of Asset Classes*

	Public Equity	Private Equity	Bonds	Private Debt	Real Assets
Primary role in portfolio (asset allocation)	Growth	Growth	Diversification	Yield	Diversification
Secondary role in portfolio (asset allocation)			Yield		Yield
Return expectation (20Y benchmark return)	High	> Public Equity	Low	> Bonds	Moderate
Alpha expectation where active: magnitude vs. cost	Low	High	Moderate	Moderate	Moderate
Consistency of excess return	Low	Moderate	Moderate	High	High
Expected liquidity	Very High	Very Low	Very High	Low	Low
RSIC Target Portfolio Expected Cost	Low	High	Low	Moderate	Moderate

A crucial component of the asset allocation review process is to ensure that appropriate benchmarks are used for the Policy Portfolio. The Commission was guided by the CFA Institute’s recommendations that benchmarks are (i) specified in advance, (ii) appropriate, (iii) measurable, (iv) unambiguous, (v) reflective of investment options, (vi) owned, and (vii) investable. In its Fiscal Year 2024-25 strategic asset allocation review, the Commission reached consensus on the benchmarks listed in Table 7 for the Policy Portfolio.

*Table 7 - Benchmark by Asset Class*

Asset Class	Benchmark
Public Equity	MSCI ACWI IMI Net

Bonds	Bloomberg Barclays Aggregate
Private Equity	Burgiss Private Equity
Private Debt	S&P LSTA +150 bps
Real Assets	75% ODCE / 25% Burgiss Core USD Infrastructure > \$1 billion

Based on the 2026<sup>5</sup> Capital Market Expectations provided by the Commission’s Investment Consultant that the Commission utilized when reaching consensus on the Policy Portfolio, the Policy Portfolio is expected to yield a thirty-year annualized rate of return of 7.31 percent with an expected volatility of 11.71~~2.1~~ percent. The Commission believes that the Policy Portfolio’s expected return and volatility are sufficient to meet its long-term investment objective.

#### D. IMPLEMENTATION PORTFOLIO BENCHMARK

The Commission recognizes that the CIO and investment staff may add value by structuring the Actual Portfolio in a manner that deviates from the Policy Portfolio target weights or may also pursue a strategy that causes the composition of an asset class to differ from the policy benchmark. As a result, the Commission provides the CIO and the investment staff with the discretion to structure the portfolio differently than the Policy Portfolio within the asset class and sub-asset class ranges shown in Table 8. In order to measure the risk and return impact of these portfolio structure decisions, the Commission employs an Implementation Portfolio Benchmark that aggregates the underlying benchmarks of each asset class and sub-asset class strategy according to their actual weights. Providing this discretion while establishing a structure that measures the value of these decisions also sets the right balance of accountability for Commission decisions and those of the CIO and investment staff.

Table 8 - Asset Class and Sub-Asset Class Ranges

Asset Class	Target	Low	High
Public Equity	43%	30%	55%
Bonds	25%	10%	35%
<i>Non-Index Investment Grade</i>	0%	0%	10%
<i>Non-Investment Grade</i>	0%	0%	10%
<i>Net Cash/Short Duration</i>	0%	0%	8%
Private Equity	12%	5%	20%
Private Debt	8%	5%	13%
Real Assets	12%	6%	18%
<i>Real Estate</i>	9%	6%	14%
<i>Infrastructure</i>	3%	0%	6%

#### E. MANAGER SELECTION

The Commission also recognizes that the CIO and investment staff strive to add additional value through manager selection. In September 2017, the Commission adopted an Investment Delegation Policy that delegated investment manager selection decisions to the CIO and investment staff within clearly defined limits and exceptions, [subject to the CEO’s oversight](#). The Investment Authority Delegation Policy is set out in Section VI. The value of manager selection is discernable by comparing the Implementation Portfolio Benchmark and the Actual Portfolio.

## F. PERFORMANCE REPORTING

Essential to the Commission's oversight function is performance reporting that makes clear the value of three major investment decisions: diversification, portfolio structure, and implementation. The Commission requires staff to provide a Portfolio Reporting Framework that easily allows the Commission to judge the value of these three investment decisions by comparing the relative performance between the Reference Portfolio, Policy Portfolio, Implementation Portfolio, and Actual Portfolio:

1. Diversification (Policy Portfolio Benchmark vs. Reference Portfolio Benchmark): The comparison of the Policy and Reference Portfolios Benchmarks reveals the value from diversification beyond a simple two-asset portfolio. The benefit of designing these portfolios with the same level of expected volatility is that the performance differential is an indication of the impact of diversification, rather than being a function of an expected risk differential. Although the effects are reported over shorter periods, the Commission should expect to see the value of diversification in this comparison over rolling five-year periods. Although these portfolios were established with the same level of expected volatility, the risk of these portfolios is expected to diverge during discrete periods of time but would generally be expected to rise and fall together over time.
2. Portfolio Structure (Implementation Portfolio Benchmark vs. Policy Portfolio Benchmark): This comparison supports an assessment of the quality of the portfolio structure. It reveals the performance impact of the decisions to structure the portfolio differently than the Policy Portfolio Benchmark. These impacts can be broken down into those that result from the weights of asset classes and those that result from the composition of asset classes. Although the effects are reported over shorter periods, the Commission should see the positive performance impact of implementation benchmark decisions over rolling three-year periods. The reporting framework also include risk reports to highlight whether and how changes in portfolio structure alter the risk characteristics of the portfolio.
3. Implementation (Actual Portfolio vs. Implementation Portfolio Benchmark): This comparison aids in evaluating the quality of implementation, a key component of which is the impact of manager selection. The Commission should expect to see differential individual manager performance as compared to the implementation benchmark over short periods of time, but the Commission should expect in aggregate to see consistent value added through manager selection. Providing this additional comparison between the Actual Portfolio and the Implementation Benchmarks also disaggregates the performance gained through portfolio structure and that gained through manager selection. This additional look through provides the Commission with an enhanced ability to effectively exercise oversight over both portfolio structure and investment manager selection decisions made by the investment staff.

## G. ASSET ALLOCATION REVIEW

The Commission will conduct an Asset-Liability Management Study and asset allocation review every five years. The Commission will continue to receive long-term capital market expectations from the Investment Consultant annually and assess the impact to the expected return and volatility of the Reference and Policy Benchmark Portfolios. However, consistent with its beliefs and long-term approach to asset allocation, the Commission intends to limit interim asset allocation changes to those the Commission determines are absolutely critical to meeting its long-term investment objective and are commensurate with its risk tolerance and fiduciary duties. Consistent with this provision, the Commission conducted a strategic asset allocation review in Fiscal Year 2024-2025.



#### IV. STRATEGIC INITIATIVES

The Strategic Initiatives described in this Section are major ongoing staff projects contemplated to last up to three years and are likely to have a more significant impact to the portfolio, asset class, or an investment strategy than typical decisions. The CIO will include changes to these initiatives as part of the annual AIP proposal and will provide a quarterly update on progress towards these initiatives at regular Commission meetings.

- ~~1. Study the efficacy of including Investment Grade Private Credit in the Bonds portfolio including, but not limited to, the impact to risk, return, liquidity, and portfolio efficiency.~~

## V. INVESTMENT POLICIES

### A. GENERAL

1. The Commission and staff must only consider pecuniary factors when making an investment decision or when allocating capital to an external investment manager. A “pecuniary factor” is a factor that a prudent person in a like capacity would reasonably believe has a material effect or impact on the financial risk or return on an investment, including a factor material to assessing an investment manager’s operational capability, based on an appropriate investment horizon consistent with a retirement system’s investment objectives and funding policy. The term excludes “non-pecuniary factors” which is any factor or consideration that is collateral to or not reasonably likely to affect or impact the financial risk and return of the investment and include but are not limited to the promotion, furtherance, or achievement of environmental, social, or political goals, objectives, or outcomes. The closing documentation of every investment must include the CEO’s certification that the decision to make the investment is based on pecuniary factors and is not being made to promote, further, or achieve any nonpecuniary goal, objective, or outcome.
2. Internal Investment Committee (IIC) and Investment Approval Process - State law provides that the AIP is to be implemented by the Commission through the CIO. RSIC employs a team of investment professionals that support the CIO in carrying out investment management duties and responsibilities. One key component of this infrastructure is the IIC. The IIC assists the CIO by reviewing and providing recommendations to the CIO regarding proposed investments. The IIC also routinely monitors the Portfolio’s investment performance and reviews relevant policies and procedures as part of its oversight function. The Commission adopted an Investment Authority Delegation Policy which grants the CIO the ability to approve those investments which fall within the parameters of this policy, subject to the oversight of the CEO. Other investments are presented to the Commission for its approval.
3. Due Diligence – The Investment Team maintains investment due diligence policies to provide consistency and oversight to the investment process. The Initial Due Diligence Policy outlines the key tenets of the RSIC’s decision-making process in hiring investment managers. The Ongoing Due Diligence Policy outlines the process and criteria used to evaluate the retention/termination of external investment managers. Both due diligence policies are tested annually by either an Agreed Upon Procedures review by an independent auditor or by the Director of Enterprise Risk Management & Compliance. The results of this review are provided to the Audit and Enterprise Risk Management Committee.
4. Counterparty Risk Management – The Quantitative Solutions Group monitors two sources of potential counterparty risk: (1) the overlay program and (2) the System’s master custodial bank. While the risk arising from the overlay program is actively monitored by its external manager, as an added layer of oversight, the Quantitative Solutions Group is responsible for reviewing and reporting on the external manager’s prudent management of these counterparty risks.
5. Investment Strategies, Objectives, and Performance Standards:
  - i. In Section III(D), the Commission described the characteristics and established the role each asset class plays in the Policy Portfolio. Within defined limits and constraints, the Commission provides the CIO and investment staff the ability to structure the portfolio for each asset class in a manner that fulfills the role the asset class plays in the portfolio. The investment staff maintain a “Baseline” document for each asset class that creates a shared understanding of how the portfolio will be structured to achieve the purpose of the asset

class established by the Commission. In general, the annual plan for an asset class will involve measures designed to improve its alignment with its Baseline. The following items are detailed in the Baseline document:

- a. The rationale and purpose of the asset class established by the Commission;
  - b. Target steady-state asset class exposures (including sub-strategies, geographies, or other relevant factors);
  - c. The target return, characteristics (income vs. appreciation), and expected active vs. passive implementation breakdown, and
  - d. An estimate of normal cost to implement the portfolio, and an estimate of the flex cost which may be incurred when market conditions present compelling opportunities.
- ii. Baselines also address the following broader issues:
    - a. The role private investments play in the Portfolio;
    - b. The mix of private vs. public market investments;
    - c. How the portfolio is likely to change over time, and
    - d. The annual commitment pacing plan for each illiquid asset class.
  - iii. The Baseline document is reviewed and updated, as necessary, at least annually, and all RSIC staff are encouraged to present suggested revisions to any Baseline. Proposed changes to the Baseline documents are presented to the IIC for review and to the CIO for approval. In addition to addressing the investment objectives and performance standards for each asset class, the Baseline also serves as a guide to workflow and portfolio management decisions. Investment decisions are reviewed against the Baseline for portfolio fit.
  - iv. As part of the individual asset class in-depth examination at each Commission meeting, the investment staff will also provide a review of the particular asset class Baseline, progress towards attaining the Baseline, and any material deviations from the Baseline.
  - v. The Commission will be informed promptly of any material change to a Baseline at the next Commission meeting following the change.

## 6. Allowable Investments and Limitations:

- i. With certain limitations discussed below, State law provides that RSIC may invest “in any kind of property or type of investment consistent with” Title 9, Chapter 16 of the S.C. Code and Section 9-1-1310. These investments include, but are not limited to, futures, forward contracts, swaps, and options, equities, bonds, loans, 144(A)’s, exchange traded funds, American Depository Receipts, real property, and real estate investment trusts. These investments may be listed, exchange traded, or over the counter, negotiated contracts or investments.
- ii. In addition to the instruments outlined above, for every asset class, a variety of investment structures may be utilized depending on the nature of a particular investment. In accordance with the terms of the investment limitations outlined in this policy, these structures may include, but are not limited to, mutual funds, limited partnerships, limited liability companies, strategic partnerships, trusts, commingled vehicles, fund-of-funds, and separately managed accounts in which assets may be held by either the Retirement

System's master custodial bank or an external custodian who is selected and monitored by the external manager or general partner.

- iii. Any investment structure and the underlying instruments must be of a type generally expected to obtain exposure to an asset or sub-asset class contained in Table 8, Section III. State law imposes certain limited restrictions on the investment of the Portfolio. The managers of the Portfolio's accounts other than index funds, commingled funds, limited partnerships, derivative instruments, or the like, are required to assist the Commission in meeting its obligations under S.C. Code Ann. §9-16-55, which sets forth limitations on investment in certain types of companies that are engaged in active business operations in Sudan. See Section IX for additional information.
- iv. The Commission has also established a policy prohibiting an investment in any security or obligation issued by a company or a corporation that is a known sponsor of terrorist organizations or of a company domiciled in a country that is a recognized sponsor of terrorism or terrorist organizations as based on reports from the Office of Terrorism and Financial Intelligence of the Department of Treasury and the Country Reports on Terrorism by the Office of the Coordinator for Counterterrorism of the U.S. [State Department](#).

7. Internal Management and Overlay Program – Currently, the staff performs distribution management which is the management and disposition of in-kind distributions received from external investment managers or third parties. In addition, the CIO has discretion to use synthetic instruments, derivatives, equity baskets, and exchange traded funds in order to implement the asset allocation or otherwise manage the portfolio in accordance with the ranges established by the Commission. The Overlay program functions as a means by which the CIO and Investment Staff manage and modify exposures and manage risk in an efficient manner using synthetic instruments, exchange-traded funds/notes, equity or fixed income baskets, options, futures, swaps, and forward currency contracts.

8. Portable Alpha – The Commission provides the CIO with the discretion to use Portable Alpha Strategies not to exceed 15 percent of total plan assets. The use of Portable Alpha is an implementation decision that is reflected in the Implementation Portfolio Benchmark. The benchmark for Portable Alpha Strategies is the Secured Overnight Financing Rate (SOFR).

9. Alternative Investments – The Commission has established guidelines applicable to its alternative investments, which include Hedge Funds and Private Markets Assets:

- i. The Commission's initial commitment to a fund will not exceed 25 percent of the committed capital of that fund, unless the Commission, or the CEO for a delegated investment, specifically waives or suspends this restriction (a) in order to take advantage of a new firm or product that has not yet built an asset base, or (b) in the case of a fund that has been created specifically for RSIC (e.g., a single LP fund) or specifically for RSIC and a limited number of other investors (e.g., two member LP fund or LLC). The closing certification for any delegated investment for which the CEO waives this requirement must conspicuously note that this limitation is being waived and identify the basis for the waiver;
- ii. Unless otherwise approved by the Commission, no more than 15 percent of an alternative asset investment allocation may be invested with a single manager, general partner, or single fund, with the exception of Funds of One and Strategic Partnerships; and

- iii. Staff will notify the Commission if the combined exposure to Private Equity, Private Debt, and Private Real Assets exceeds 40 percent of total plan assets.

10. Equity investments not to exceed 70 percent – State law provides that the AIP must also include the minimum and maximum allocations to equity investments on an ongoing basis, not to exceed 70 percent. The allowable ranges for equity investments are set forth in Table 8, Section III(E). While State law does not stipulate whether the limitation of 70 percent is based on cost or market value, the Commission manages this limitation by the amount of exposure to equity on a market value basis. Therefore, if the exposure to equity investments exceeds 70 percent of the total market value of the Portfolio, the CIO is required to rebalance the Portfolio.

11. Managing Cost – In accordance with State law, the AIP addresses methods for managing the costs of RSIC’s investment activities. RSIC strives to earn the highest risk-adjusted return on a net of fees basis and recognizes that cost is an important variable to consider. The Investment Team actively engages in an array of strategies to reduce the cost of the Portfolio, including the following:

- i. Increasing the initial investment size;
- ii. Seeking aggregation discounts from firms with which RSIC has multiple investment strategies;
- iii. Utilizing co-investments in private markets;
- iv. Quantifying and monitoring the effectiveness of active implementation across public market asset classes; and
- v. Requesting reductions to, or elimination of, management fees, as appropriate.

12. Risk:

- i. All investments carry some degree of risk. The focus of RSIC’s risk function is managing and monitoring these risks to ensure that the Portfolio’s risks are appropriate and that the overall level of risk taken is consistent with meeting the Commission’s investment objective. Key risk initiatives are:
  - a. Incorporating the Plan’s liability structure into the investment decision process; and
  - b. Developing and refining tools to facilitate the incorporation of the Plan’s liabilities into portfolio management.
  - ~~b.~~
- ii. RSIC Staff monitors risk levels both in absolute terms, but also in relation to the Reference Policy benchmark established by the Commission’s asset allocation. This is accomplished using a mix of proprietary and third-party systems and tools.

iii. At the Portfolio level, Staff will:

- a. Maintain the Portfolio’s asset allocation within the limits established by this policy;
- b. Employ an appropriate level of diversification and adhere to the limits within this policy or as contracted with the manager;
- c. Adhere to policies and procedures established by the Commission; and
- d. Maintain adequate liquidity for benefit payments and capital calls.

- ~~iii-iv. Staff provides the Commission with risk reporting as part of the Portfolio Performance Framework to ensure that risk remains within acceptable levels and to judge the value of portfolio structure and manager selection decisions on a risk adjusted basis.~~
- ~~a. Maintain the Portfolio's asset allocation within the limits established by this policy;~~
  - ~~b. Employ an appropriate level of diversification and adhere to the limits within this policy or as contracted with the manager;~~
  - ~~c. Adhere to policies and procedures established by the Commission; and~~
  - ~~d. Maintain adequate liquidity for benefit payments and capital calls.~~
  - ~~i. Staff provides the Commission with risk reporting as part of the Portfolio Performance Framework to ensure that risk remains within acceptable levels and to judge the value of portfolio structure and manager selection decisions on a risk adjusted basis.~~

13. Manager Monitoring Guidelines - RSIC Staff maintains an Ongoing Due Diligence Policy that outlines the manager monitoring requirements in detail. In summary, the Investment Team is required to perform periodic reviews of each active manager. These reviews contribute to the decision to either retain or terminate that manager. These reviews involve both quantitative and qualitative assessments in order to ensure that any decision is made fairly and consistently, and to avoid untimely or undisciplined decisions that may adversely impact returns. Additionally, the CIO is briefed by an RSIC operation's team member on the audited financial statements annual reviews, compliance certifications, and investment fees. ~~Investment Team reviews summaries of the audited financial statements, compliance certifications, and investment fees on an annual basis.~~ Compliance with the Ongoing Due Diligence Policy is reviewed annually through an Agreed Upon Procedures audit performed by an independent auditor.

14. Proxy Voting:

- 1) Shareholder proxy votes must be cast in a manner in keeping with fiduciary duty and in a manner that is consistent with the best interest of the trust fund, based on pecuniary factors, and most likely to maximize shareholder value over an appropriate investment horizon. Any engagement with a company regarding the exercise of shareholder proxy votes or the proposal of a proxy question must be based on pecuniary factors and for the purpose of maximizing shareholder value, except that RSIC may engage with a company to express opposition to the proposal of or the merits of a proxy question that does not have a pecuniary impact.
- ~~2) To the extent that it is economically practicable, RSIC must retain the authority to exercise shareholder proxy rights for shares that are owned directly or indirectly. RSIC may retain a proxy firm or advisory service to assist it in exercising shareholder proxy rights, but only if the proxy advisor has a practice of and commits to follow proxy guidelines that are consistent with the requirements of item (1).~~
- ~~2)~~
- ~~3) RSIC may only allocate capital to a public equity investment strategy if the manager of the investment strategy has a practice of and commits in writing to meet the requirements of item (1), unless it is not economically practicable to do so, or it is necessary to avoid the concentration of assets with any one or more investment managers. For any public equity investment strategy for which the manager does not have a practice of and does not commit in writing to meet the~~

requirements of item (1), a summary of the terms, fees, and performance of the investment must be included in RSIC's annual investment report and published in a conspicuous location on the RSIC's website.

3)

~~4)~~ The Commission must annually review compliance with this section regarding the exercise of shareholder proxy rights. The Commission must review a report that summarizes the votes cast by or on the Commission's behalf or at the Commission's direction. The report must include a vote caption, RSIC's vote, the recommendation of company management, and the recommendation of any proxy advisor retained by RSIC. This report must be posted in a conspicuous location on the Commission's website.

4)

5) The Commission finds that the provisions of Section 9-16-30(G) of the South Carolina Code are intended to apply to public equity investments and are not intended to apply to private equity investments given the nature, structure, and characteristics of private equity investments.

## B. COMPLIANCE

1. Placement Agent Policy – State law prohibits RSIC from making an investment where a placement agent receives compensation in connection with RSIC's investment. The Commission's Placement Agent Policy is set out in Section VIII.

2. Investment Manager Sourcing and Conflict Disclosure Policy – In order to enhance transparency and avoid even the appearance of impropriety, before an investment recommendation is made to the Commission or CIO, any Commissioner or RSIC staff member involved in the sourcing or due diligence of a new investment must disclose any conflict with the proposed investment. Additionally, the CEO and CIO must disclose any conflict with any proposed investment.

3. Annual Certification and Ongoing Testing of Guideline Compliance – The Ongoing Due Diligence Policy requires each manager to annually certify its compliance with the contractually specified guidelines. These certifications are compiled by RSIC Compliance and reviewed by the Director of Operational Due Diligence ("DODD") who then ensures the results of the review are reported in the CIO. ~~reviewed by RSIC's Compliance function and the Investment Team reviews summaries of the certifications.~~ Compliance with the manager certification process is reviewed annually through an Agreed Upon Procedures Audit performed by an independent auditor. For public markets mandates which are governed by an Investment Management Agreement and custodied with the master custodial bank, automated reports are generated and reviewed on those mandates that can be monitored electronically.

## C. GOVERNANCE AND OVERSIGHT

1. Performance Standards and Reporting - As noted above, State law requires that the AIP address the Commission's performance standards. The performance standards and benchmarks are described in Section III. In addition, RSIC receives monthly performance reports from the custody bank and the Commission receives quarterly performance reports prepared by RSIC's performance reporting staff and the general investment consultant. The performance reporting prepared by RSIC performance reporting staff must incorporate the Portfolio Performance Framework required in Section III.

2. Diversification – State law requires that the AIP address the topic of diversification, including sectors, issues and other allocations of assets that provide diversification in accordance with prudent

investment standards. The Commission provides the CIO with parameters regarding its diversification objectives through the asset allocation, asset and sub-asset allocation ranges, and performance standards set out in Section III. The Portfolio Reporting Framework required in Section III also provides the Commission the ability to oversee the implementation of the long-term portfolio strategy, as well as the actual implementation of the Commission's diversification directives.

3. Procedures regarding consultants, managers, service providers selections and terminations

- i. Selection - State law requires that AIP include procedures and policies for selecting, monitoring, compensating, and terminating investment consultants, equity investment managers, and other necessary professional service providers. Investment managers are primarily selected by the CIO, subject to the oversight of the CEO, pursuant to the Investment Authority Delegation Policy through an investment process that also complies with the Investment and Operational Due Diligence Policies. The CIO recommends to the Commission for its approval the selection of any manager of an investment that exceeds the limits of or falls into one of the exceptions to the investment delegation policy. Any investment recommended to the Commission for its approval must also comply with the Investment and Operational Due Diligence Policies. All other service providers are selected pursuant to the Commission's Service Provider Selection Policy which is included in the Commission's Governance Policies (RSIC Governance Policies can be found at: [https://www.rsic.sc.gov/\\_documents/Governance-Policy-Manual.pdf](https://www.rsic.sc.gov/_documents/Governance-Policy-Manual.pdf))
- ii. Compensation, Fees and Expenses – Service providers, including consultants and investment managers, will be compensated commensurate with the services provided and industry practices. The Commission will pursue cost savings through structural efficiencies and will strive for fee reductions through negotiations. Investment management fees are evaluated utilizing several metrics or tests. First, fees are examined relative to industry/peer standards. Second, when it reviews potential new mandates or restructurings of existing allocations, the investment staff assesses fees based on the cost relative to other implementation options. For example, in global public equities, the fees charged by active managers (as well as their expected performance and risk) are compared to other methods of obtaining similar market exposure, while in the private markets, fees (as well as expected performance and risk) are compared to public market implementation alternatives. Lastly, to the extent practicable, fees will also be evaluated based on an assessment of the manager's ability to generate excess returns. Investment Staff gathers actual fees and provides annual public disclosure of all fees paid to external managers. The Commission receives an annual report on the cost of its investment program from an independent expert and may also call upon its investment consultants for assistance in analyzing and addressing issues relating to investment fees. Operating expense applicable to internal investment operations and the general business of the RSIC are managed by the CEO within the parameters of the annual budget approved by the General Assembly.
- iii. Term and Termination -The Commission or the CIO, as applicable, may terminate an investment manager whenever the Commission or CIO determines that its objectives can more efficiently or effectively be met by the selection of another manager or under a different management mandate. The Commission and CIO retain the right to terminate a manager with or without cause and at any time. It should be noted that termination rights

may not apply to certain types of investment structures (e.g., typical private markets funds). Circumstances which suggest an immediate review and a possible termination include, but are not limited to, the following:

- a. Manager changes strategy or investment style;
- b. Critical elements of the investment process have deteriorated;
- c. Transaction costs are unreasonable;
- d. Management fees are higher than similarly styled managers for similarly sized portfolios;
- e. Manager is unable to meet the performance expectations within the risk tolerance specified;
- f. Material organizational or personnel changes;
- g. Manager is not complying with the applicable provisions of the Commission's SIOP; and
- h. Manager is not complying with the applicable provisions of the Commission's AIP.

4. Delegation of Authority to CIO - State law requires that the AIP and SIOP contain a detailed description of the delegation of final authority to invest made by the Commission. The Commission has delegated its final authority to invest to the CIO, subject to the oversight of the CEO, generally in the following amounts:

- a. not to exceed 75-100 bps of plan value per investment for illiquid structures; and
- b. not to exceed 200 bps of plan value per investment for liquid structures.

The Commission's full Investment Authority Delegation Policy is set out in Section VI.

5. Policies and Procedures to Adapt Portfolio to Market Contingencies - State law requires that the AIP include policies and procedures providing flexibility in responding to market contingencies. The ranges included with the Commission's asset and sub-asset class allocation ranges established in Section III provide the CIO with extensive flexibility to adapt the portfolio to market conditions. Similarly, the Commission's Investment Authority Delegation Policy provides the CIO the ability to adapt the Portfolio to changes in market conditions. To the extent that the CIO deems the scope of the authority delegated to the CIO insufficient, the CIO with the approval of the CEO may take action deemed necessary to protect the Portfolio in an extreme market environment. The CIO will promptly inform the Commission of any such actions.

6. Portfolio Rebalancing - The Commission delegates to the CIO or his designee the authority to execute manager and/or securities transactions to implement rebalancing, manage liquidity, or to otherwise manage exposures within the allowable ranges. As part of this delegation, the Commission expects the CIO to articulate, implement and provide reporting to the Commission regarding the Portfolio's rebalancing and exposure management activities as requested. A high-level summary of the rebalancing and exposure management guidelines include:

- i. Portfolio exposure is reviewed on an ongoing (weekly and monthly) basis by Staff and the CIO to ensure that the Portfolio is within its allocation ranges and to identify appropriate actions necessary to maintain compliance and to provide for the Plan's liquidity needs.
- ii. The goal of the rebalancing and exposure management activities is to implement the investment strategy at a reasonable cost within the targets and ranges established by the

Commission, recognizing that constant rebalancing to the exact target may not be economically justifiable. The following guidelines are used:

- a. Rebalancing is currently performed quarterly unless a case has been made not to rebalance. Potential rebalancing activity is flagged for consideration based upon exposure reporting that is updated by RSIC's performance reporting staff. Rebalancing the portfolio incurs costs (trading commissions, bid-ask spread, and market impact) which are taken into consideration when rebalancing the Portfolio;
- ~~b.~~ When an asset class reaches its minimum or maximum allocation, Staff will initiate rebalancing transactions to keep allocations within the approved ranges. Otherwise, Staff must seek Commission approval to remain outside the range; and
- ~~b.~~
- ~~iii-c.~~ Concentration risk with respect to significant reliance on any single external manager is reviewed regularly by Staff. Mitigation of performance, operational, headline/ reputational, or other fiduciary risks is typically achieved by maintaining a diversified allocation approach both within and across asset classes.
- ~~iv-iii.~~ RSIC Staff must balance the risks noted above with the economic benefits associated with a streamlined approach that uses fewer, larger allocations. Additional analyses of the costs and benefits of passive vs. active market exposure are an important input in these decisions.

#### **D. INVESTMENT MANAGER GUIDELINES**

1. General - In keeping with the responsibilities assigned to the CIO by State law and the Commission's Governance Policies, the Commission authorizes the CIO and his designees to develop and revise investment management guidelines for each internally and externally managed investment manager. In making this delegation, the Commission acknowledges that discretion in implementing the investment strategy, within the parameters of all applicable guidelines, will typically be granted to the Commission's investment managers. This discretion is usually limited to the selection of securities and the timing of transactions within the portion of the Portfolio allocated to each manager.
2. Funds of One - A Fund of One is an investment structure in which there is typically a majority investor in a specific vehicle or fund. The Commission or CIO as applicable may elect to use a Fund of One structure when the structure will have lower costs, customized exposure advantages, and/or other beneficial considerations. The CIO is responsible for the day-to-day investment responsibilities with respect to Funds of One, including providing affirmative or negative consent for underlying investments, as required.
3. Pooled or Commingled Funds:
  - i. Commingled investment vehicles can often provide lower costs and better diversification than can be obtained with a separately managed account pursuing the same investment objectives.
  - ii. The Commission or CIO, as applicable, may structure a portfolio as a separate account that allows for the advantages of commingled vehicles, but with RSIC as the only investor. With international assets, commingled vehicles save the Commission from having to provide additional resources for currency and foreign custody issues as the manager will assume responsibility for these functions.

- iii. If an investment mandate is structured through a commingled vehicle, the investment policies of that vehicle will be the legal governing policies of the investment of assets allocated to that vehicle.
4. **Strategic Partnerships** - The Commission may elect to establish Strategic Partnerships with certain asset managers who are believed to possess specific expertise, knowledge, and capabilities for a limited or broad range of investment strategies. The performance of each Strategic Partnership will be reviewed by the Commission periodically, with a more comprehensive review occurring approximately every 3 to 5 years. The investment approval and evaluation process within the Strategic Partnership is similar to that followed for other investments, however, in addition to passing RSIC's internal process, the investment must also be approved by the investment committee of the strategic partnership.
  5. **Trade Execution** - For all accounts, ~~the Commission~~ RSIC expects the purchase and sale of its securities to be conducted in a manner designed to receive the best combination of price and execution. ~~RSIC~~ The Commission may evaluate policies that provide for the most efficient and effective trading process. The compliance with investment guidelines must be monitored by the investment managers on an ongoing basis and be based on then-current market values. Securities that, if purchased, would constitute a compliance violation may not be purchased. In the event of a compliance violation, the manager will be expected to promptly notify investment staff. If for some reason the manager does not believe that it is prudent to immediately bring the account back into compliance, the manager will be expected to present a justification as well as a proposal for bringing the account composition back into compliance.

#### **E. COMPLIANCE WITH SECTION 9-16-320 OF SOUTH CAROLINA CODE**

1. S.C. Code Section 9-16-320 requires the Commission to meet at least once each fiscal quarter for the purpose of reviewing the performance of investments, assessing compliance with the annual investment plan, and determining whether to amend the plan.
2. The Commission has adopted a strategic calendar that sets a meeting schedule of five meetings per year with at least one meeting every fiscal quarter. The strategic calendar also contains standing agenda items for each meeting to ensure compliance with this Section to include:
  - i. Quarterly Investment Performance Review – ~~At~~ At each meeting the Commission receives a report and presentation on the quarterly, fiscal year to date, one, five, and ten-year plan investment performance. The quarterly performance reports and presentations are based on the Portfolio Performance Reporting Framework described in Section III and are designed to provide the Commission with the ability to judge the absolute value of performance as well as the relative performance between the benchmark portfolios and actual portfolio's performance. The Commission also receives risk reports to judge the absolute and relative risk of the of these portfolios.
  - ii. AIP Compliance Review – At each meeting the Commission receives reports detailing compliance with the Annual Investment Plan to include:
    - a. A review of the asset class exposures and sub-asset class components of the portfolio to ensure compliance with the allowable ranges contained in Section III, Table 8, and to ensure adequate diversification of the portfolio and that the portfolio is not concentrated in any one industry sector, market sector, or issuer;
    - b. A review of relevant progress towards any of the Strategic Initiatives in Section IV;

- c. Any significant market contingencies and review of any responsive action that resulted in a decision not to rebalance the portfolio pursuant to Section V.C.6 or any action taken to protect the Portfolio which fell outside the allowable ranges in Section III, Table 8;
  - d. Action resulting in significant cost savings to the Portfolio;
  - e. Any material deviation from the general operational and investment policies, and
  - f. As part of an in-depth review of one of the Policy Portfolio asset classes at each meeting, a review of the asset class baseline and progress towards meeting the baseline.
- iii. The Commission retains the authority to amend any portion of the AIP requirements at any meeting and is required to consider amendments proposed by the CIO at its April meeting. However, if the Commission does not act to amend the AIP at any other meeting, it should be presumed that it determined not to amend the plan.

#### **F. GENERAL PROVISIONS RELATED TO ALTERNATIVE INVESTMENTS**

1. South Carolina law, the Employee Retirement Income Security Act of 1974 (“ERISA”), and the Uniform Management of Public Employee Retirement Systems Act of 1997 (“UMPERSA”) each have similar or compatible, but not identical, definitions and responsibilities of fiduciaries with respect to managing and investing assets of retirement systems. For clarity and consistency, it is prudent for the Commission to declare standards for interpretation of certain terms used in these sources.

2. As relating to the use of alternative investment strategies, the “Plan Assets” of the Retirement System include the System’s ownership interest in the following entities (e.g., a share or a unit), but do not include the underlying assets owned by the entity itself:

- i. a registered investment company;
- ii. a registered security that is widely held and freely transferable;
- iii. an entity in which “benefit plan investors” hold less than 25 percent of the equity interest as defined and determined by ERISA §3(42);
- iv. an “operating company” engaged in the production or sale of a product or service other than the investment of capital;
- v. a “real estate operating company” or REOC (which actively manages and develops real estate consistent with U.S. Department of Labor ERISA regulations);
- vi. a “venture capital operating company” or VCOC (which actively manages “venture capital investments” consistent with U.S. Department of Labor ERISA regulations); or
- vii. a private investment partnership or offshore investment corporation the offering memorandum of which allows for the entity to take both long and short positions, use leverage and derivatives, and invest in many markets.

3. Whenever RSIC invests in an entity that does not hold Retirement System’s assets, the decision to invest in the entity will be subject, inter alia, to the South Carolina fiduciary rules and ethics standards provided by state law, but the transactions engaged in by the entity generally will not be subject to the same rules.

4. RSIC will at times need to interpret statutes while implementing and administering the investment program. Whenever the South Carolina statutes are substantively similar to provisions \_\_\_\_\_ of ERISA or UMPERSA, and to the extent practicable and consistent with South Carolina law and other principles of general application relating to public pension plans, RSIC intends to use (1) pertinent provisions of ERISA;

(2) interpretive rules and regulations of the U.S. Department of Labor relating to ERISA; and (3) the Reporter's official comments to UMPERSA for guidance.

## VI. INVESTMENT AUTHORITY DELEGATION POLICY

A. ~~(1)~~ Pursuant to Section 9-16-330(B) of the 1976 Code, the Commission delegates to the CIO the final authority to invest subject to the oversight of the CEO and the requirements and limitations of this policy. The size of any one investment made pursuant to this policy is limited to the percentage of total plan assets that applies to the particular asset class to which the investment pertains as provided in Section C of this policy and subject to any other limitation the Commission may place on this authority at any given time. The value of total plan assets to which the percentage limitations apply must be the estimated total value of plan assets included in the most recent quarterly investment performance report prepared pursuant to Section 9-16-90(A) of the 1976 Code. ~~For purposes of this policy, a co-investment made outside of a co-investment partnership (e.g., the GCM Co-Investment Partnership or a co-investment vehicle attached to a fund investment) is considered a separate and distinct investment from an investment in a commingled fund, fund of one structure, or an amount committed to a separately managed account and is separately subject to the limitations and requirements of this policy.~~ Individual investments made in a separately managed account or a fund of one structure are not considered separate investments for purposes of this policy and are subject in aggregate to the limitations and requirements of this policy regardless of whether some degree of discretion is retained by staff regarding individual investments to be included in the applicable account.

B. The investment process for any investment made pursuant to this policy must adhere to RSIC's Due Diligence Guidelines and Policies. Notwithstanding the authority granted by this policy, an investment must be presented to the Commission for its approval if it meets any of the following criteria:

1. An investment into an asset class other than (i) an asset class or sub-asset class provided in Table 8, Section III of the Consolidated AIP/SIOP or (ii) Portable Alpha Hedge Funds;
2. The majority of the types of assets contemplated to underlie the investment have not been previously included in the investment portfolio;
3. The strategy to be employed by the investment manager is not substantially similar to an investment that has been previously subject to ~~RSIC's the Commission's~~ investment due diligence process; or
4. The investment strategy, other than in publicly traded assets, has important direct connections to South Carolina residents, state policymakers, or South Carolina focused businesses, and/or a majority of the assets of the investments would be principally located in South Carolina.

C. ~~The amount of delegation for new investments approved pursuant to this policy shall not exceed 5% of the total value of Plan assets between regularly scheduled Commission meetings.~~ The size of an individual investment made pursuant this policy is subject to the following limitations provided for the asset class applicable to the investment:

1. Public Markets - 2% of the total value of plan assets, unless it is reasonable to believe that due to the particulars of the investment strategy that liquidating the investment would ordinarily require longer than ninety days and, in such case, the limit is 1% of the total value of plan assets, for:
  - i. Global Public Equity:
    - a. Domestic,
    - b. Developed Non-US,

- c. Emerging Market.
  - ii. Bonds:
    - a. Core Bonds (IG),
    - b. Inflation-linked (IG),
    - c. Mixed Credit,
    - d. Non-IG,
    - e. EM Debt,
    - f. Non-index (IG),
    - g. Net Cash and Short Duration, and
  - iii. Portable Alpha Hedge Funds.
- 2. Publicly-Traded Real Estate - 1% of the total value of plan assets.
- 3. Private Markets - ~~75 bps~~ 1% of the total value of plan assets for:
  - i. Private Equity,
  - ii. Private Debt,
  - iii. Private Real Assets,
    - a. Real Estate, and
    - b. Infrastructure.

D. Pursuant to Section 9-16-330(B)(2), the closing documentation of any investment made pursuant to this policy must include the CEO's certification that the investment conforms to the amount and extent of delegation provided by this policy.

E. The Commission must be informed of an investment made pursuant to this policy no later than three business days following the closing of the investment. The notification must include an executive summary of the investment and provide access to any of the following documents relied upon by staff when making the investment:

1. the investment due diligence report,
2. the operational due diligence report,
3. any memorandum and/or reports from the general or specialty consultant,
4. the Internal Investment Committee action summary,
5. the completeness check certification, and
6. the final versions of pertinent legal documents, including the Investment contract, limited partnership agreement, the investment management agreement, as applicable, and/or other closing documents.

F. An investment made pursuant to this policy must be reviewed with the Commission at the next regularly scheduled Commission meeting. The Commission must be notified if the aggregate amount of all delegated investments subject to the reporting requirements of Section E made between regularly scheduled Commission meetings exceeds 5% of Plan assets and the notification must also provide an estimate of the total percentage amount of any additional investments above the 5% threshold likely to be made prior to the next meeting.

G. Passively Managed Strategies (Public Markets) - The Commission believes that the use of indexed strategies in Public Equity and Bonds has been, and continues to be, an important tool of portfolio management. For Public Equity and Bonds, a decision to add or reduce indexed benchmark exposure is considered an implementation decision, rather than an investment decision, and is not subject to the

limitations set forth in subsection C.1, and is rather subject to the asset class ranges provided in Section III, Table 8.

G.H. Co-investments provide RSIC the opportunity to invest alongside a fund or structure's individual investments at favorable fee terms. These favorable fee terms allow RSIC to enhance an investment's return by the amount of savings compared to the fee terms of the fund or structure. In many instances, RSIC is already committed to the applicable fund or structure, and co-investments allow RSIC to lower blended costs which benefits the fund or structure's return. In order to reduce idiosyncratic risk, co-investments must be sized in a way that creates a diversified portfolio of co-investments and avoids concentration in any one investment. Co-investments require a greater speed of execution than regular fund investments, so RSIC must maintain a co-investment process that ensures opportunities are evaluated in a timely manner while also providing a commensurate degree of due diligence. Given the need for timely execution and the often-sensitive nature of co-investment opportunities, co-investments of 10 basis points or less of Plan assets are not subject to the reporting requirements of Section E. In order to ensure proper oversight, the Commission must be provided with a report during each meeting's Executive Session of all co-investments made since the last meeting.

H.I. The CIO must provide the Commission with an updated proposed investment pipeline on a quarterly basis.

I.J. The delegation of the final authority to invest pursuant to this section includes the authority to terminate an investment manager as described in Section V.C.iii. The CIO must approve any termination of a manager made pursuant to this policy, subject to the oversight of the CEO. The CIO must provide a memorandum to the Commission summarizing his justification for terminating the manager within three days of terminating the manager. The CIO must provide a review of the termination to the Commission at the next Commission meeting.

J.K. The Commission will review this policy annually to ensure that it remains relevant and appropriate, or when there has been an amendment to state law relevant to any section of this policy, or a Commission approved change in the responsibilities, duties or operations of the Commission or its Committee generally, or as otherwise deemed appropriate by the Commission.

K.L. No provision of this policy shall apply to the extent that it is in conflict with any provision of the Code of Laws of South Carolina, 1976, as amended. In the event of such conflict, the applicable Code provision shall apply in all respects.

L.M. This policy was adopted by the Commission on September 28, 2017, subject to final approval by the Chair of the incorporation of certain amendments into the policy. The Chair issued final approval of the policy on October 23, 2017.

N. This policy was amended on December 2, 2021, and took effect on December 2, 2021.

M.O. This policy was further amended on April 18, 2024, and took effect on July 1, 2024.

P. This policy was ~~last further~~ amended on ~~June 5,~~ 2025, and took effect on ~~June 15,~~ 2025.

N.Q. This policy was further amended on April 16, 2026 and took effect July 1, 2026.



## VII. SECURITIES LITIGATION POLICY (“POLICY”)

### A. PURPOSE AND GENERAL PRINCIPLES

- a. The purpose of this Policy is to set forth the South Carolina Retirement System Investment Commission’s<sup>1</sup> guidelines with respect to securities litigation. Interests in securities litigation matters will be managed as assets of the South Carolina Retirement Systems Group Trust (the “Trust”) with the goal of enhancing the long-term value of the Trust.
- b. The Commission acknowledges that it has a fiduciary duty to take reasonable actions to pursue and collect on legal claims held as an asset of the Trust. The Commission also recognizes that most, if not all, of the securities litigation claims in which the Trust may have an interest will be pursued by law firms from the class action bar regardless of whether RSIC takes an active role in the litigation.
- c. This Policy outlines the Commission’s procedures for monitoring the Trust’s portfolio for potentially actionable losses, protecting the Trust’s interests in litigation related to portfolio losses, and maximizing recoveries attainable by the Trust from such actionable losses.
- d. This policy consists of four sections: 1) a section relating to asset recovery as passive class members in U.S.-based securities actions; 2) a section for litigation of securities listed on domestic exchanges where RSIC deems active participation is warranted; 3) a section for litigation of securities listed on foreign exchanges; and 4) a section related to the monitoring process for both foreign and domestic claims in which the Trust takes an active role.

### B. PART ONE: SECURITIES LITIGATION POLICY FOR FILING PROOFS OF CLAIM (“PASSIVE PARTICIPATION”)

- a. Under U.S. federal law, securities class action lawsuits function as “opt-out” cases. This means that the Trust does not need to participate as a named party in order to recover its pro rata share of a class action recovery so long as the certified class claims include the losses incurred by the Trust. This type of participation is called Passive Participation. When notified of a class action settlement in which the Trust has suffered a loss, RSIC need only submit a timely and valid proof of claim in order to be included in any recovery.
- b. The Trust’s custodial bank, The Bank of New York Mellon (“~~BNY Mellon~~BNY”), is responsible for completing and filing all proofs of claim, including the necessary supporting documents and information in every securities class action pending in the U.S. in which the Trust has a direct interest (i.e., for Trust assets that are custodied at ~~BNY Mellon~~BNY (“In- Bank Assets”)). ~~BNY Mellon~~BNY is not responsible for filing proofs of claim for, or otherwise reporting on the management of, securities class action litigation for assets that are not custodied at ~~BNY Mellon~~BNY (“Out-of-Bank Assets”).

<sup>1</sup> “Commission” refers to the commission of eight members responsible for managing the South Carolina Retirement System Investment Commission, as specified in S.C. Code of Laws Ann. Section 9-16-315.

“South Carolina Retirement System Investment Commission” or “RSIC” refers to the agency established by South Carolina law for the purpose of investing and managing all assets held in trust for the participants and beneficiaries of the state’s five separate defined benefit plans.

- c. ~~BNY Mellon~~BNY's claims filing responsibilities are set forth in more detail in the Service Level Description, dated July 21, 2019, between the Trust by and through RSIC and ~~BNY Mellon~~BNY (the "SLD"). The SLD outlines the process for: (i) identifying and reviewing all class action recoveries (whether by settlement or trial); (ii) providing timely notice of each settlement recovery to RSIC and the Commission; (iii) filing complete and accurate proofs of claim forms in a timely fashion on behalf of the Trust; (iv) providing quarterly reports outlining all claims filed on behalf of the Trust during the quarter; and (v) providing quarterly reports identifying all securities litigation proceeds recovered by the Trust directly or on its behalf. In the event of a claim involving securities that are not identified by a specific security identifier (e.g., CUSIP, ISIN, SEDOL, etc.), ~~BNY Mellon~~BNY will use commercially reasonable efforts to identify impacted securities recorded in ~~BNY Mellon~~BNY's records relating to the security named in the documentation received. In the event that ~~BNY Mellon~~BNY is unable to file a claim on the Trust's behalf (e.g., involving anti-trust claims), ~~BNY Mellon~~BNY, or in some cases a third party, will forward the relevant claim information to RSIC, and RSIC will utilize the services of third-party claims filing services that specialize in analyzing and filing such claims.

### C. PART TWO: SECURITIES LITIGATION POLICY FOR SECURITIES LISTED ON A DOMESTIC EXCHANGE

- a. While the Commission has a fiduciary obligation to take reasonable action to collect on legal claims held by the Trust, the Trust, acting by RSIC, may need to engage in active participation ("Active Participation") on occasion. This type of participation involves serving as lead plaintiff in cases in the domestic exchange context. Active Participation in domestic securities class actions must be balanced with the Commission and RSIC's primary obligation to maximize the investment returns of the Trust. This determination must also be weighed against the additional costs and burden on staff that may result by becoming lead plaintiff in a securities litigation case as well as the recognition that the Trust's position as a lead plaintiff will not, in and of itself, entitle the Trust to any greater recovery.
- b. Authority to Seek Lead Plaintiff Designation: Due to the time-sensitive nature of electing to seek a lead plaintiff designation and the Chief Executive Officer's ("CEO") statutory designation as the chief administrative officer of RSIC, the Commission, through this Policy, has delegated to the Executive Leadership Team the authority to elect to seek a lead plaintiff designation where appropriate, reasonable, and prudent to protect the interests of the Trust.
- c. Decision-Making Guidance for Active Participation: The Executive Leadership Team will generally consider seeking lead plaintiff status ("Active Participation") in a domestic class action when: (i) the Trust's projected losses exceed \$5 million U.S. Dollars (the "Loss Threshold"); or (ii) when the loss is substantial but less than the Loss Threshold and there are significant special factors justifying the Trust's involvement. The determination of special factors will be made in the discretion of the Executive Leadership Team.
- d. Monitoring Procedures: In addition to the reporting provided by ~~BNY Mellon~~BNY for class action litigation involving In-Bank Assets, the Trust may retain three or more securities litigation monitoring law firms (the "Firms") to advise RSIC via periodic reporting of recently-filed class actions in which the Trust has sustained losses and which appear to have merit. The Firms will generally be engaged for up to five years, with the option to terminate earlier or renew for additional periods. Each of the Firms will provide reporting on at least a quarterly basis outlining all recently filed claims in which the Trust has sustained losses. Additionally, the Firms will submit written memos to RSIC on certain cases, including any cases exceeding the Loss Threshold,

regarding the alleged facts of the case, the estimated losses, the Firm’s view on the merits of the allegations, and a recommendation as to whether RSIC should seek a lead plaintiff position in the matter. RSIC Legal will perform an initial review of all reports and memos received from the Firms. Any reports or memos indicating a loss that exceeds the Loss Threshold will be forwarded to the CLO for further review. The CLO will review the reports and will follow up with the Firms that have provided the memorandum to get additional insight and information about potential claims exceeding the Loss Threshold (“Reviewable Claims”) and will make additional inquiries or conduct additional research as needed.

- e. After review by the CLO, the CLO will confer with the Executive Leadership Team regarding the merits of Reviewable Claims, including the projected losses incurred by the Trust, the specifics of the related investment(s), available staff resources, and the recommendations of the Firms regarding whether the Trust should seek a lead plaintiff position. Any decision to seek a lead plaintiff designation for a claim exceeding the Loss Threshold or based on special circumstances must be made by a unanimous vote of the Executive Leadership Team. The Executive Leadership Team will notify the Chair and Vice-Chair of the Commission about any decision to seek a lead plaintiff position and will update the Commission via reporting to the Commission’s secure portal.
- f. Selection of Outside Counsel for Securities Litigation If the Executive Leadership Team determines that it is prudent to hire one of the Firms or other legal counsel to represent the Trust in a securities litigation action to protect the assets of the Trust, all selection of counsel and retainer agreements shall be negotiated, executed, and monitored by the CEO with assistance from the CLO. The CEO may engage one of the Firms hired to monitor the Trust’s portfolio, or the CEO may seek to engage other counsel after consultation with the CLO and notice and consultation with the Office of the South Carolina Attorney General, as required by S.C. Code Ann. Section 9-16-315(I). When RSIC first engages the Firms, RSIC will pre-negotiate a proposed engagement agreement for potential litigation, which must be approved by the CEO.

#### **D. PART THREE: SECURITIES LITIGATION FOR SECURITIES LISTED ON A FOREIGN EXCHANGE**

- a. Due to the 2010 Supreme Court case, *Morrison v. National Australia Bank Ltd.*,<sup>2</sup> investors no longer have the protections of U.S. securities laws for securities that were purchased on a non-U.S. exchange. Unlike the U.S. class action process, foreign securities actions generally require investors to join as a named-plaintiff or “opt-in” at the commencement of the case in order to be entitled to a share of any recovery. This “opt-in” process requires affirmative decisions early in the process to join the lawsuit in order to participate in any recovery. In many cases, investors may be required to make these decisions before a foreign action is even filed.
- b. Decision-Making Guidance for Active Management: Because there is rarely an option for passive participation in foreign securities actions, the review for participation in these actions differs from those explained in Part Two of this Policy. The CLO will review notices of potential claims in foreign securities actions and will review recommendation memos received from the Firms or other sources in those cases where the loss threshold exceeds \$1 million (the “Foreign Loss Threshold”). In foreign jurisdictions, various groups, including non-law firm litigation funding organizations, may act as a funding source for the litigation and work with a certain legal team to initiate litigation. In some cases, the group that first files a lawsuit may become a founding group (“Founding Group”). Founding Groups may impose differing terms and conditions in order to

<sup>2</sup> *Morrison v. National Australia Bank Ltd.*, 561 U.S. 247 (2010).

participate in a lawsuit. The CLO will review all available factors relating to participating in foreign actions for claims exceeding the Foreign Loss Threshold, including but not limited to: (i) the amount of the loss; (ii) the potential litigation fees; (iii) the litigation funding requirements; (iv) whether more than one litigation funding group is proposing participation; (v) the risk of adverse costs; (vi) the legal merits of the case; (vii) the contractual requirements for joining and/or bringing a claim; and (viii) the potential cost of staff's time. After reviewing the above factors and the documentation required to elect to participate in the applicable foreign jurisdiction, the CLO will make a recommendation to the CEO on whether to participate, and if applicable, which Founding Group to elect based on the most suitable contract terms available for the Trust. The CEO, after reviewing the CLO's recommendation, will elect (A) whether or not to pursue participation in foreign litigation that exceeds the Foreign Loss Threshold; and (B) which funding group to select based on the terms and legal requirements of each. The CLO, working with the Firm(s), as applicable, will negotiate the required documentation and retain the right to change a recommendation to participate if suitable contract terms cannot be negotiated with the Founding Group.

**E. PART FOUR: LITIGATION MONITORING FOR ACTIVE PARTICIPATION IN DOMESTIC AND FOREIGN LITIGATION**

- a. The CEO, acting via the CLO, will monitor any pending domestic or foreign cases in which RSIC is actively participating. The CLO will request quarterly written status updates from any Firms representing RSIC in Active Participation cases. The CLO will actively participate in discussions with the Firms regarding any participation by RSIC Staff or document production needs. The CEO and CLO will be actively involved in settlement discussions for any domestic litigation action. The CLO will submit periodic updates to the CEO and the Commission regarding such cases. In accordance with the CEO's statutory authority as chief administrative officer of the Commission, the CEO retains the ultimate authority related to the direction of any class action litigation and/or settlement pursuant to this Policy. The CEO may consult the Commission on any matter related to the initiation of or conduct of any lawsuit pursuant to this Policy. The CEO shall have full authority to approve a proposed settlement of any litigation. In addition, the CEO shall have full authority to execute all contracts, legal documents, settlements, certifications, and authorizations required to pursue litigation authorized by the Executive Leadership Team.

**F. THE COMMISSION SHALL REVIEW THIS POLICY AT LEAST ONCE EVERY THREE (3) YEARS TO ENSURE THAT IT REMAINS RELEVANT AND APPROPRIATE.**

## VIII. PLACEMENT AGENT POLICY

### A. PURPOSE

It is the intent of this Policy to comply with S.C. Code Ann. §9-16-100, which prohibits compensation being paid to a Placement Agent (as defined below) as a result of an investment by the Retirement System (as defined below).

### B. DEFINITIONS

For purposes of this Policy, the following capitalized terms will have the defined meaning set forth below:

- a. Pursuant to §9-16-100(B), a “Placement Agent” means any individual directly or indirectly hired, engaged, or retained by, or serving for the benefit of or on behalf of an external manager or an investment fund managed by an external manager and who acts or has acted for compensation as a finder, solicitor, marketer, consultant, broker, or other intermediary in connection with making an investment with or investing in a fund managed by the external investment manager.
- b. “Placement Agent Policy Compliance Letter” means that letter which will be requested from prospective external investment management firms in accordance with the terms of this Policy.
- c. “Policy” means this Placement Agent Policy.
- d. “Retirement System” means the South Carolina Retirement Systems Group Trust.
- e. “RSIC” means the South Carolina Retirement System Investment Commission.

### C. PROCEDURE

- a. RSIC staff will inform prospective external investment management firms (“Investment Managers”) as to the RSIC’s Placement Agency Policy and statutory requirements as soon as practicable after RSIC staff begins the due diligence review of any potential investment. The RSIC staff member leading the due diligence review for the investment is responsible for sending written notice (paper, fax or email) to the Investment Manager requesting a Placement Agent Policy Compliance Letter. If a copy of this Policy has not already been provided to the Investment Manager, then this Policy will be made available to the Investment Manager prior to or at the time notice is given to the Investment Manager.
- b. The Placement Agent Policy Compliance Letter must be included in the RSIC investment Due Diligence Report packet.
- c. Investments will not be voted on by the Commission, Internal Investment Committee, or otherwise approved pursuant to RSIC policies, prior to receipt of the completed Placement Agent Policy Compliance Letter and confirmation from RSIC compliance staff that the letter is sufficient per Section G below.
- d. The following entities must complete the Placement Agent Policy Compliance Letter as outlined below:
  - i. Investment Managers that have a direct contractual investment management relationship with the RSIC or with an investment vehicle in which the RSIC is invested.
  - ii. Investment Managers that have an indirect contractual investment management relationship with the RSIC through an investment vehicle that invests in funds or other pooled investment vehicles or other assets.

#### **D. PLACEMENT AGENT POLICY COMPLIANCE LETTER**

The Investment Manager will provide disclosures in the form of a letter addressing all requirements specified below:

- a. Certification that, in compliance with §9-16-100, no Placement Agent (as defined by State law) received, or will receive, compensation in connection with the RSIC making an investment with or investing in a fund managed by the Investment Manager.
- b. Representation that the Investment Manager has reviewed the applicable law and has not relied on the counsel or advice of RSIC or any employee, representative, agent or officer of RSIC regarding the interpretation and application of the applicable law.
- c. Representation that all information contained in the Placement Agent Policy Compliance Letter is true, correct, and complete in all material respects.

#### **E. OPEN RECORDS LAW**

RSIC may be required to disclose information in the Placement Agent Policy Compliance Letter under the South Carolina Freedom of Information Act.

#### **F. INVESTMENTS WITH SEPARATE ACCOUNT INVESTMENT MANAGEMENT AGREEMENTS (“IMAs”)**

If, after closing, the RSIC determines that the Placement Agent Policy Compliance Letter contains a material inaccuracy or omission, the RSIC will, to the fullest extent possible, seek the option, in its sole discretion and without liability to the Investment Manager or any third party, to terminate the IMA and to pursue all remedies that may otherwise be available to the RSIC without incurring any penalty under any agreement to which it is a party.

#### **G. INVESTMENTS IN COMMINGLED INVESTMENT STRUCTURES (LPAs, LLCs, TRUSTS, ETC.)**

The RSIC will endeavor to have provisions incorporated into the transaction documents for commingled investment structures which would permit the RSIC to take those actions described in the next sentence. If, after closing, the RSIC determines that the Placement Agent Policy Compliance Letter contains a material inaccuracy or omission, the RSIC will seek to obtain the option, in its sole discretion and without liability to the commingled investment structure, the General Partner or equivalent management entity, any other investor in the structure or third party, to cease making further capital contributions and/or direct payments to the investment and to pursue all remedies that may otherwise be available to the RSIC without being deemed to be a defaulting Limited Partner under the transaction documents and without incurring any other penalty under any agreement to which it is a party.

#### **H. REVIEW**

RSIC’s compliance staff will review Placement Agent Policy Compliance Letters and will determine whether each letter is sufficient. Any questions regarding the sufficiency of the letter will be referred to the RSIC legal department and will be reported to the CIO and applicable RSIC Staff.

#### **I. STAFF CONTACT**

RSIC staff will provide notice about the prohibition in the state law to any party that contacts RSIC staff regarding a potential investment and appears to be acting in the role of a Placement Agent.

**J. OBLIGATION TO UPDATE**

It is the Investment Manager's obligation to promptly inform RSIC staff of any material changes to a prior-filed Placement Agent Policy Compliance Letter, and to submit an updated Placement Agent Policy Compliance Letter where warranted prior to the RSIC's closing on an investment.

**K. REVIEW AND HISTORY**

- a. The Commission will review this policy at least every three years to ensure that it remains relevant and appropriate, or when there has been an amendment to state law relevant to any section of this policy, or a Commission approved change in the responsibilities, duties, or operations of the Commission or its committees generally, or as otherwise deemed appropriate by the Commission.
- b. No provision of this policy shall apply to the extent that it is in conflict with any provision of the Code of Laws of South Carolina, 1976, as amended. In the event of such conflict, the applicable Code provision shall apply in all respects.
- c. This policy was initially adopted on September 20, 2012.
- d. This policy was amended on June 22, 2017 and will take effect on July 1, 2017.

## IX. SUDAN DIVESTMENT POLICY

A. Background. The State of South Carolina has enacted a Sudan divestment law, codified at S.C. Code Ann. §9-16-55 (“Act”). The uncodified preamble to the Act notes that “[d]ivestment is a course of last resort that should be used sparingly and under extraordinary circumstances,” but states that “the genocide occurring in the Sudan is reprehensible and abhorrent,” warranting this type of legislative response. The Act, which applies solely to the South Carolina Retirement Systems Group Trust (“Group Trust”) managed by the South Carolina Retirement System Investment Commission (“Commission” as the governing body, “RSIC” as the agency), sets forth various criteria that are to be considered by the Commission in making the determinations required by the Act.

B. Purpose. The purpose of this Sudan Divestment Policy (“Policy”) is to document the manner in which the Act is administered. The Commission has the exclusive authority to invest and manage the assets of the Group Trust pursuant to S.C. Code Ann. §9-16-20. The Commission also has the fiduciary duty to manage the assets of the Group Trust solely in the interests of the retirement systems, participants, and beneficiaries. The Commission must discharge these responsibilities in a manner consistent with all applicable statutes, regulations, and policies, including the Act.

C. Definitions. The Act utilizes the following defined terms:

- a. “Active Business Operations” means a Company engaged in Business Operations that provide revenue to the Government of Sudan or a Company engaged in Oil-Related Activities.
- b. “Business Operations” means maintaining, selling, or leasing equipment, facilities, personnel, or any other apparatus of business or commerce in Sudan, including the ownership or possession of real or personal property located in Sudan.
- c. “Company” means a sole proprietorship, organization, association, corporation, partnership, venture, or other entity, its subsidiary or affiliate that exists for profit-making purposes or to otherwise secure economic advantage. “Company” also means a Company owned or controlled, either directly or indirectly, by the Government of Sudan, that is established or organized under the laws of or has its principal place of business in the Sudan.
- d. “Government of Sudan” means the Government of Sudan or its instrumentalities as further defined in the Darfur Peace and Accountability Act of 2006.
- e. “Investment” means the purchase, ownership, or control of stock of a Company, association, or corporation, the capital stock of a mutual water Company or corporation, bonds issued by the government or a political subdivision of Sudan, corporate bonds, or other debt instruments issued by a Company.
- f. “Military Equipment” means weapons, arms, or military defense supplies.
- g. “Oil-Related Activities” means, but is not limited to, the export of oil, extracting or producing oil, exploration for oil, or the construction or maintenance of a pipeline, refinery, or other oil field infrastructure.
- h. “Public Employee Retirement Funds” means those assets as defined in §9-16-10(1).
- i. “Scrutinized Companies” means any of the following:
  - i. The Company is engaged in Active Business Operations in Sudan; and
  - iii. The Company is engaged in Oil-Related Activities or energy or power-related operations, or contracts with another Company with Business Operations in the

oil, energy, and power sectors of Sudan, and the Company has failed to take Substantial Action related to the Government of Sudan because of the Darfur genocide; or

- iv. The Company has demonstrated complicity in the Darfur genocide.
- v. The Company is not engaged in Oil-Related Activities and lacks significant Business Operations in the eastern, southern, and western regions of Sudan; and
- vi. The Company is engaged in Oil-Related Activities or energy or power-related operations, or contracts with another Company with Business Operations in the oil, energy, and power sectors of Sudan, and the Company has failed to take Substantial Action related to the Government of Sudan because of the Darfur genocide; or
- vii. The Company has demonstrated complicity in the Darfur genocide.
- viii. The Company supplies Military Equipment within the borders of Sudan.<sup>3</sup>
- j. “State” means the State of South Carolina.
- k. “Substantial Action” means a boycott of the Government of Sudan, curtailing business in Sudan until that time described in Section I of this Policy, selling Company assets, equipment, or real and personal property located in Sudan, or undertaking significant humanitarian efforts in the eastern, southern, or western regions of Sudan.
- l. “Sudan” means the Republic of the Sudan, a territory under the administration or control of the Government of Sudan, including, but not limited to, the Darfur region, or an individual, Company, or public agency located in Khartoum, northern Sudan, or the Nile River Valley that supports the Republic of the Sudan.

D. Identification of Companies

- a. Identifying Scrutinized Companies. RSIC Staff (“Staff”) has engaged the services of a specialized research firm (“Advisor”) to (i) identify companies doing business in Sudan, as defined in the Act, and (ii) provide Staff with a list of such Scrutinized Companies (“Scrutinized Companies List”).
- b. Updates to Scrutinized Companies List. Staff shall ensure that the Scrutinized Companies List is updated on or about January 1 and July 1 of each year.

E. Engagement

- a. Determining Scrutinized Status. For each Company identified by the Advisor pursuant to Section D of this Policy, RSIC (either via Staff or the Advisor) shall send a written notice informing the Company that it may become subject to divestment by RSIC. The notice shall offer the Company the opportunity to clarify its Sudan-related activities within 90 days in order to avoid qualifying for potential divestment.
- b. Compliance. If, following RSIC’s notification (either via Staff or the Advisor) to a Company pursuant to Section E. a. of this Policy, that Company ceases the activities that caused the Company to be added to the Scrutinized Companies List, as determined by the Advisor, the Company shall be removed from the Scrutinized Companies List, and the provisions of this

---

<sup>3</sup> If a Company provides equipment within the borders of Sudan that may be readily used for military purposes, including but not limited to, radar systems and military-grade transport vehicles, there is a strong presumption against investing in the Company unless that Company implements safeguards to prevent the use of that equipment for military purposes.

Section E shall cease to apply to the Company unless it resumes the activities that caused the Company to be added to the Scrutinized Companies List.

F. Determinations to be made by the Chief Investment Officer

- a. Delegation to the Chief Investment Officer. The Commission has delegated authority to the Chief Investment Officer (“CIO”) to, in consultation with RSIC’s Chief Executive Officer, make the determinations required under the Act and to take actions necessary to implement this Policy.
- b. General. If, following RSIC’s engagement with a Company pursuant to Section E. a. of this Policy, the Company continues to be a Scrutinized Company, Staff will present the CIO with detailed information gathered from the Advisor, affected investment managers, and others regarding the Company, its Business Operations, the Group Trust’s holdings, and any other information required by the Act and this Policy. The CIO will make determinations as to (i) whether Staff should sell, redeem, divest, or withdraw the Group Trust’s interests in the Company, and (ii) the timing of any such sale, redemption, divestment, or withdrawal. The CIO will also make the determinations described in Section I of this Policy.

G. Prohibition. RSIC shall not use Public Employee Retirement Funds to acquire new Investments in Companies on the Scrutinized Companies List, except as provided in this Policy.

H. Permissible Investments under the Act

- a. The Act does not apply to the following types of Investments:
  - i. Investments in a Company that is primarily engaged in supplying goods or services intended to relieve human suffering in Sudan;
  - ii. Investments in a Company that promotes health, education, journalistic, or religious activities in or welfare in the western, eastern, or southern regions of Sudan;
  - iii. Investments in a United States Company that is authorized by the federal government to have Business Operations in Sudan; and
  - iv. Investments that constitute indirect beneficial ownership through index funds, commingled funds, limited partnerships, derivative instruments, or the like.
- b. In developing the Scrutinized Companies List, the Advisor shall determine, in good faith and with due professional care, whether any of the foregoing exemptions and exclusions set forth in the Act apply.

I. Determinations required to be made by the CIO pursuant to §9-16-55(D)(1). The Act states that nothing in the Act “requires the [C]ommission to take action as described in [the Act] unless the [C]ommission determines, in good faith, that the action described in [the Act] is consistent with the fiduciary responsibilities of the [C]ommission as described in [Title 9, Chapter 16 of the Code] and there are appropriated funds of the State to absorb the expenses of the [C]ommission to implement this [Act].” §9-16-55(D)(1). Accordingly, whenever the CIO is asked to consider taking action under the terms of the Act or this Policy, Staff will assist the CIO in making the determinations required to be made as described in this Section.

- J. Reporting. Staff shall, following the close of RSIC's fiscal year, prepare a formal report to the Commission regarding actions taken pursuant to the Act. RSIC shall also publish the report. The report shall include all of the following information with respect to the previous fiscal year:
- a. The Scrutinized Companies List;
  - b. A list of all Companies added to or removed from the Scrutinized Companies List;
  - c. A summary of correspondence with Companies engaged by RSIC under the Act;
  - d. A list of all Companies that RSIC will continue to engage concerning their Business Operations in Sudan;
  - e. A summary of all Investments sold, redeemed, divested, or withdrawn under the Act; and
  - f. A list of all Investments that were retained by RSIC pursuant to a determination by the CIO as set forth in Section I.
- K. Expiration. The restrictions in the Act shall apply only until:
- a. The Government of Sudan halts the genocide in Darfur for twelve months as determined by both the Department of State and the Congress of the United States; or
  - b. The United States revokes its current sanctions against Sudan.
- L. Indemnification. The Act provides that present and former board members, officers, and employees of the State Fiscal Accountability Authority, present, future, and former directors, officers, and employees of the South Carolina Public Employee Benefit Authority, the Commission, and contract investment managers retained by the Commission must be indemnified from the general fund of the State and held harmless by the State from all claims, demands, suits, actions, damages, judgments, costs, charges, and expenses, including court costs and attorney's fees, and against all liability, losses, and damages of any nature whatsoever that these present, future, or former board members, officers, employees, or contract investment managers shall or may at any time sustain by reason of any decision to restrict, reduce, or eliminate Investments pursuant to the Act.

**X. LONG-TERM ANNUALIZED RETURN AND VOLATILITY EXPECTATIONS  
(VERUS 2025)**

## XI. ASSET ALLOCATION HISTORY

The following is included in the AIP/SIOP to memorialize the major strategic asset allocation changes the Commission made in 2020 as the result of a one-year review over the course of Fiscal Year 2019-2020. This review yielded two important outcomes: (1) a shift from a complex strategic asset allocation comprised of eighteen asset classes with target weights to a simplified asset allocation comprised of five asset classes with target weights, and (2) instilling a discipline of only conducting a comprehensive strategic asset allocation review once every five years. The Commission believes that it is important to maintain the history of this asset allocation review as part of the AIP/SIOP to preserve the reasoning and lessons learned as part of the Commission's institutional memory.

The Commission undertook a comprehensive strategic asset allocation review of the then-existing Policy Portfolio in early 2019 which led to the Commission adopting a streamlined strategic asset allocation in April 2020. At the time the Commission began the 2019-2020 strategic asset allocation review, the Policy Portfolio was comprised of eighteen separate asset classes with twenty-one different benchmarks. Many of the asset classes had small target weights – several with less than three percent.

Both the CIO and the Investment Consultant expressed concern that the Policy Portfolio was over-diversified and required a high level of complexity to exist in the Actual Portfolio without a clear improvement in risk or return. The Commission found this to be inconsistent with its investment belief that investors must be rewarded for incurring additional risk, cost, and complexity. The Commission also believed that the existing Policy Portfolio established the wrong balance between its role as setting the strategic direction of the investment program and investment staff's role in implementing the portfolio. As a result, the Commission determined that a more consolidated Policy Portfolio was in order which valued simplicity and required complexity in the Actual Portfolio to prove its value. The Commission determined that key to this effort was developing a series of benchmarks that would collectively form a Portfolio Performance Framework to clearly determine the value of investment decisions.

### Reference Portfolio

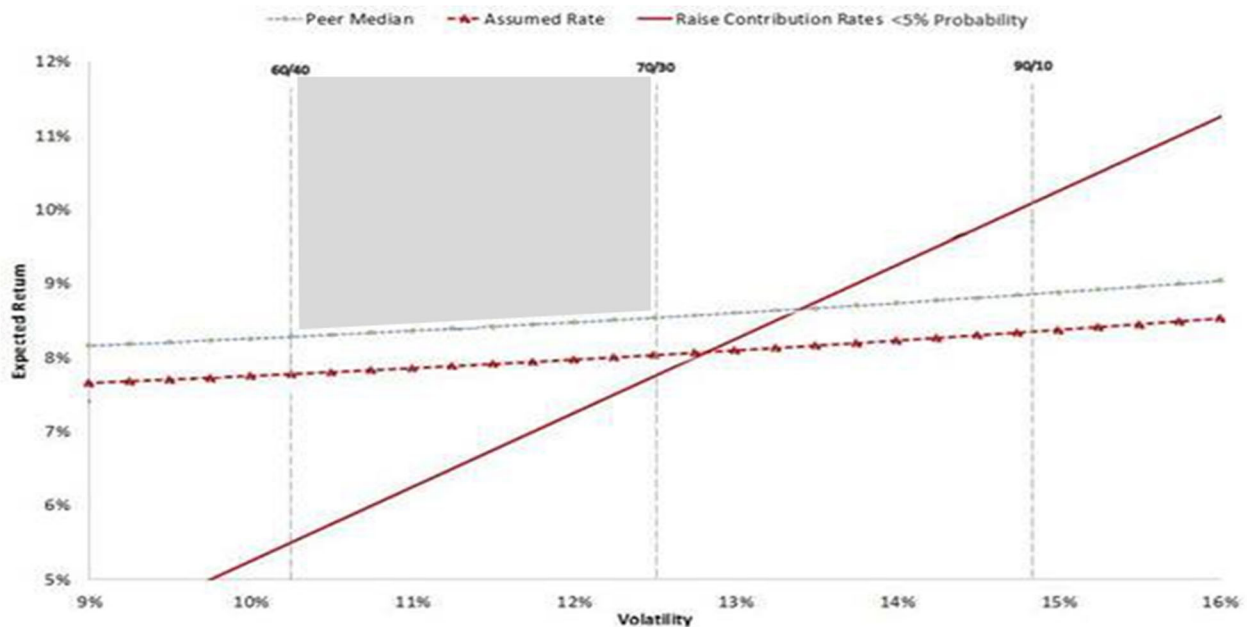
The Commission decided that it would begin the development of this framework by setting a Reference Portfolio. The Reference Portfolio would be a simple two asset class benchmark portfolio comprised of stocks and bonds. The point of the Reference Portfolio was not to limit the portfolio to a simple mix of stocks and bonds, but rather to set a risk reference for establishing the Policy Portfolio. Although the intent was for the Reference Portfolio's risk to represent that of the Policy Portfolio, the Reference Portfolio would not serve as a risk limit for the Policy Portfolio, but rather a barometer to measure the value over time of diversifying into a multi-asset class portfolio.

The Commission attempted to set the allocation of the Reference Portfolio to one consistent with a portfolio that most closely expressed the risk required to earn a return that was expected to exceed the then assumed annual rate of return while also avoiding a greater than 5 percent probability of requiring additional contributions increases in the next ten years (other plan risks were also contemplated but would also be avoided because these risks would either fall along the same line or to the right of the red risk line represented in Table 9 below). In setting the Reference Portfolio, the Commission was mindful that South Carolina law provides that no more than seventy percent of the portfolio may be invested in equities. The law does not limit the types of assets that could make up the other thirty percent of the portfolio, which could conceivably include assets like high yield bonds which have an embedded equity risk factor. However, the Commission believed it was prudent to constrain the Reference Portfolio to no

more than seventy percent equity risk, as expressed by a seventy percent allocation to equities, and to mitigate the equity risk with a thirty percent allocation to bonds.

The Commission considered the appropriate Reference Portfolio at its April and June 2019 meetings. The Commission determined that a 70 percent Global Public Equities (MSCI ACWI IMI Net) and 30 percent Bonds (Bloomberg Barclays Aggregate) portfolio best represented the volatility of a diversified portfolio of assets that would be expected to earn a return that exceeds the assumed annual rate of return over time while also avoiding a greater than 5 percent probability of requiring additional contributions increases in the next ten years. The Commission reached consensus on this allocation as the Reference Portfolio Benchmark. In reaching this consensus, the Commission accepted that a Reference Portfolio with a risk level associated with a seventy percent allocation to equities was prudently necessary to meet its investment objective.

*Table 9 - Reference Chart for the Allocation Portfolio*



### Policy Portfolio

After reaching consensus on the Reference Portfolio in June 2019, the Commission then began establishing a Policy Portfolio that would serve as the Commission's long-term strategic asset allocation. The Policy Portfolio would be a multi-asset class portfolio with similar expected volatility as the Reference Portfolio. The Policy Portfolio would be expected to consolidate the then existing eighteen asset class Policy Portfolio into a more simplified allocation without substantially impacting the expected return, but with a similar level of risk as the Reference Portfolio. The purpose of setting the Policy Portfolio's risk target to that of the Reference Portfolio was to reveal the performance impact gained through diversification.

However, unlike the Reference Portfolio, the Policy Portfolio would be a portfolio that could be held and, in any respect, would serve as the gravitational pull to a more simplified Actual Portfolio.

The Commission considered the transition to a more simplified Policy Portfolio at its April and June 2019 meetings and reached consensus on the transition to the simplified target allocation in Table 2 below.

*Table 10 - Legacy Asset Allocation vs. 2020 Asset Allocation*

Legacy Asset Allocation (%)		2020 Asset Allocation (%)	
Nominal IG Bonds	6	Bonds	26
Treasuries	5	Private Debt	7
TIPS	2	Global Equity	46
Mixed Credit	4	Private Equity	9
EM Debt	4	Real Assets	12
Private Debt	7		
US Equity	18		
Developed Int'l Equity	11		
EM Equity	6		
Equity Options	7		
Private Equity	9		
Real Estate (Public)	1		
Real Estate (Private)	8		
Infrastructure (Public)	1		
Infrastructure (Private)	2		
PA Hedge Funds	10		
GTAAs	7		
Other Opportunistic	1		

The Commission also analyzed whether the Policy Portfolio would meet the Commission's long-term investment objective in that it would likely exceed the assumed rate of return and avoid risks particular to the Plan including not meeting the General Assembly's funded status objectives and avoiding a significant probability of requiring additional contribution increases. This analysis was based on the Investment Consultant's 2019 Capital Market Expectations.

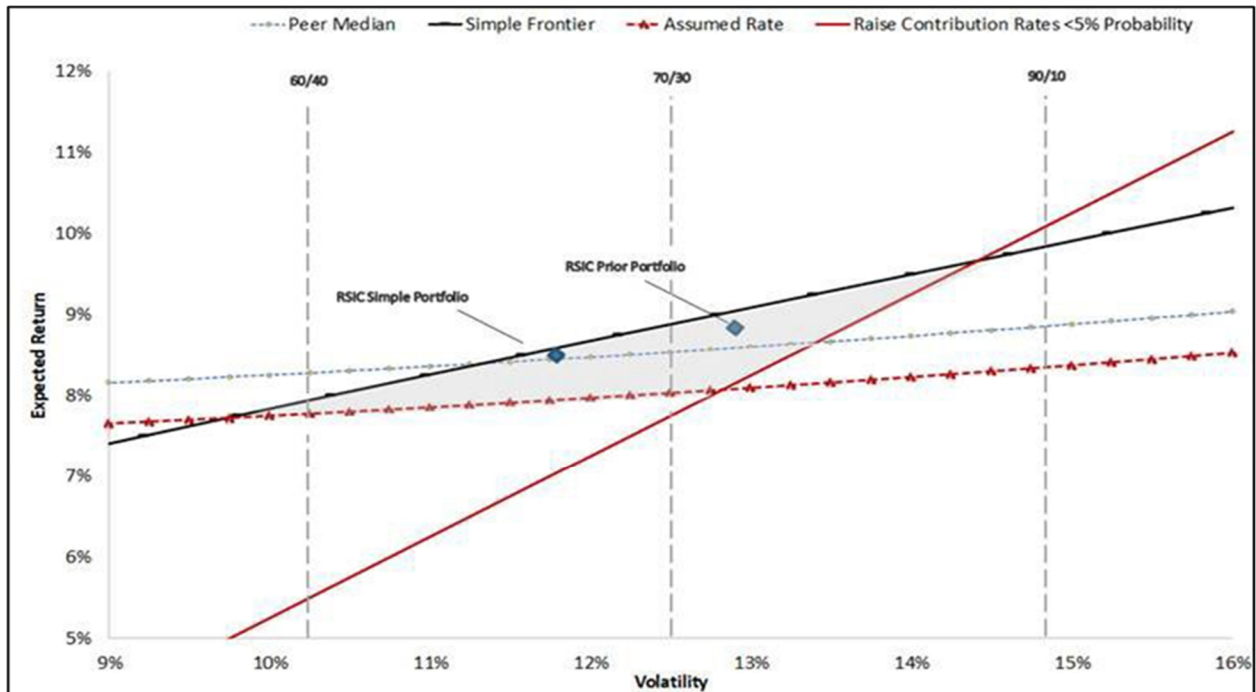
As demonstrated in Table 10<sup>4</sup>, the Policy Portfolio would be expected to:

1. exceed the assumed rate of return,
2. compare favorably to the simple frontier<sup>5</sup>,
3. compare favorably to the risk of the Reference Portfolio Benchmark; and
4. experience a less than 5 percent probability of requiring additional contributions increases in the next ten years (again other plan risks were also contemplated but would also be avoided because these risks would either fall along the same line or to the right of the risk line represented on the table).

<sup>4</sup> Although the Investment Consultant's long-term capital market expectations were based on projected asset class returns over twenty years, the Reference and Policy Portfolios' risk and return were calculated using these expectations to produce thirty-year results.

<sup>5</sup> The simple or efficient frontier comprises investment portfolios that offer the highest expected return for a specific level of risk. In this case, the investment portfolios along the simple frontier are limited to a mix of the five asset classes from the simplified portfolio shown in Table 12.

Table 11 - Expected Return vs. Volatility for RSIC's Prior and Simple Portfolios



In reaching consensus on the asset allocation, the Commission also considered what role each asset class would play in the overall portfolio with each asset class performing the primary role of growth, diversification, or yield:

**Public Equity:** This asset class includes investments in the stock of publicly traded companies. The purpose of public equity in the portfolio is growth. The excess return expectations for this asset class are low. The asset class is highly liquid and can be accessed with minimal implementation cost.

**Bonds:** This asset class includes investments in debt securities issued by governments, corporations, or other issuers. The primary purpose of bonds in the portfolio is diversification and the secondary purpose is to provide yield. The excess return expectations for this asset class are low and the asset class is expected to provide a persistent source of return while remaining highly liquid. Bonds are expected to serve a stabilizing function in times of market stress.

**Private Equity:** This asset class includes equity investments in privately held companies. Investors have historically been compensated with incremental return over comparable public equity investments in exchange for lower liquidity and increased business risk as compared to the public markets. The primary role of private equity in the overall portfolio is growth with an expected long-term return that exceeds public equity. The excess returns of this asset class are a source of magnitude of return for the portfolio the value of which is expected to exceed the higher cost of implementation as compared to public equity.

**Private Debt:** This asset class includes investments that provide alternative financing to businesses or assets and are in competition with traditional capital market or bank financing. Investors are compensated with incremental return over what can be achieved through traditional forms of lending

in exchange for lower liquidity as compared to liquid credit markets and for serving as a solutions provider to these businesses. The primary role of this asset class in the portfolio is yield. The expectations for the consistency of return above what can be achieved through bonds or the liquid credit markets is high.

**Real Assets:** This asset class includes investments in physical assets like real property and infrastructure, as opposed to financial assets like stocks and bonds. The primary role of this asset class is diversification with the secondary purposes of providing inflation protection and yield. Although the expected liquidity for this asset class is low, the expectations for excess return are high.

*Table 12 - Roles and Expectations of Asset Classes*

	<b>Public Equity</b>	<b>Private Equity</b>	<b>Bonds</b>	<b>Private Debt</b>	<b>Real Assets</b>
Primary role in portfolio (asset allocation)	Growth	Growth	Diversification	Yield	Diversification
Secondary role in portfolio (asset allocation)			Yield		Yield
Return expectation (20Y benchmark return)	High	> Public Equity	Low	> Bonds	Moderate
Alpha expectation where active: magnitude vs. cost	Low	High	Moderate	Moderate	Moderate
Consistency of excess return	Low	Moderate	Moderate	High	High
Expected liquidity	Very High	Very Low	Very High	Low	Low
RSIC Target Portfolio Expected Cost	Low	High	Low	Moderate	Moderate

The Commission believed that this change in approach to a five asset-class Policy Portfolio shifted the paradigm to one which values simplicity and holds a more complex portfolio accountable for improving risk-adjusted returns. A crucial component to ensure this accountability was having the appropriate benchmarks for the Policy Portfolio. The Commission was guided by the CFA Institute's recommendations that benchmarks are (i) specified in advance, (ii) appropriate, (iii) measurable, (iv) unambiguous, (v) reflective of investment options, (vi) owned, and (vii) investable. At its September 2019 meeting, the Commission reached consensus on the benchmarks in Table 13 for the Policy Portfolio.

*Table 13 - Asset Class Benchmarks for the Policy Portfolio*

Asset Class	Benchmark <sup>6</sup>
Public Equity	MSCI ACWI IMI Net
Bonds	Bloomberg Barclays Aggregate
Private Equity	Burgiss Private Equity
Private Debt	S&P LSTA +150 bps
Real Assets	NCREIF ODCE Net

Based on the 2019 Capital Market Expectations provided by the Commission’s Investment Consultant that the Commission utilized when reaching consensus on the Policy Portfolio, the Policy Portfolio would have been expected to achieve a twenty-year annualized rate of return of a 7.83 percent with an expected volatility of 11.69 percent. The portfolio would have been expected to have a 58.41 percent probability of earning a twenty-year annualized rate of return that met or exceeded the then assumed rate of return of 7.25 percent.

### Implementation

The Commission recognized that the CIO and investment staff may add value by structuring the Actual Portfolio in a manner that deviates from the Policy Portfolio target weights or may also pursue a strategy that causes the composition of an asset class to differ from the policy benchmark. As a result, the Commission provided the CIO and the investment staff with the discretion to structure the portfolio within the asset class and sub-asset class ranges in Table 14. In order to measure the risk and return impact of these portfolio structure decisions, the Commission designed an Implementation Portfolio Benchmark that aggregates the underlying benchmarks of each asset class and sub-asset class strategy according to their actual weights. Providing this discretion while establishing a structure that measures the value of these decisions also set the right balance of accountability for Commission decisions and those of the CIO and investment staff.

Table 14 - Target and Range Percentages for Asset Class and Sub-Asset Classes of the Implementation Portfolio

Asset Class	Target	Range	
Public Equity	46%	30%	60%
<i>Domestic</i>	<i>Index</i>	<i>Index +/- 6%</i>	
<i>Developed Non-US</i>	<i>Index</i>	<i>Index +/- 6%</i>	
<i>Emerging Market</i>	<i>Index</i>	<i>Index +/- 4%</i>	
<i>Equity Options</i>	0%	0%	7%
Bonds	26%	10%	35%
<i>Core Bonds (IG)</i>	26%	10%	35%
<i>Inflation-linked (IG)</i>	0%	0%	5%
<i>Mixed Credit (non-IG)</i>	0%	0%	8%
<i>EM Debt</i>	0%	0%	6%
<i>Net Cash/Short Duration</i>	0%	0%	7%

<sup>6</sup> The Private Equity and Private Debt portfolios and benchmarks will be reported on a 3-month lag. MSCI ACWI IMI Net - Morgan Stanley Capital International All Country World Index Investable Market Index; S&P LSTA - Standard & Poor’s Loan Syndication and Trading; and NCREIF ODCE – National Council of Real Estate Investment Fiduciaries Open End Diversified Core Equity.

Asset Class	Target	Range	
Private Equity	9%	5%	13%
Private Debt	7%	3%	11%
Real Assets	12%	6%	18%
<i>Real Estate</i>	9%	5%	13%
<i>Infrastructure</i>	3%	0%	5%

Despite changes in market conditions and fluctuations in capital market expectations, the Commission adhered to the discipline of only comprehensively reviewing the strategic asset allocation once every five years and made no material change the asset allocation or other provisions of this section in the intervening time-period. The Commission conducted its first subsequent strategic asset allocation review in Fiscal Year 2024-2025.

## XII. TABLES 1 AND 2 (PRIOR YEAR VERSIONS)

Table 15 - SCRS Expected Funded Ratio as of 6/30/2021 (2022)

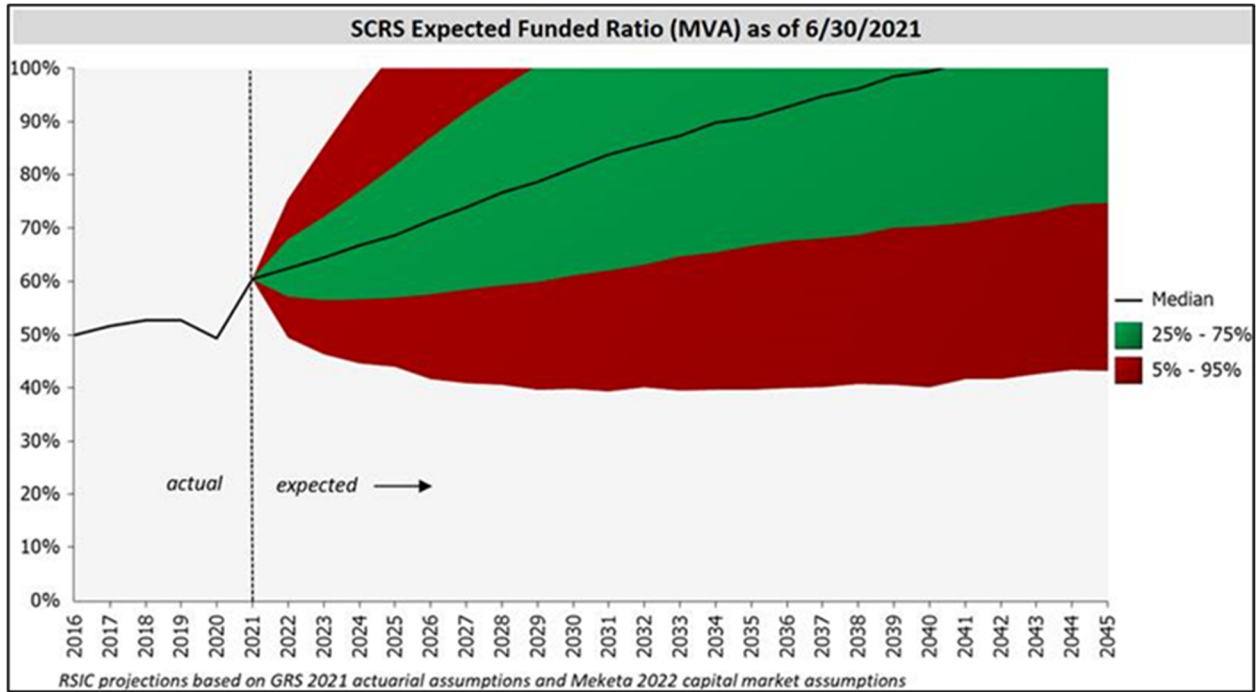


Table 16 - SCRS Expected Funded Ratio as of 6/30/2020 (2021)

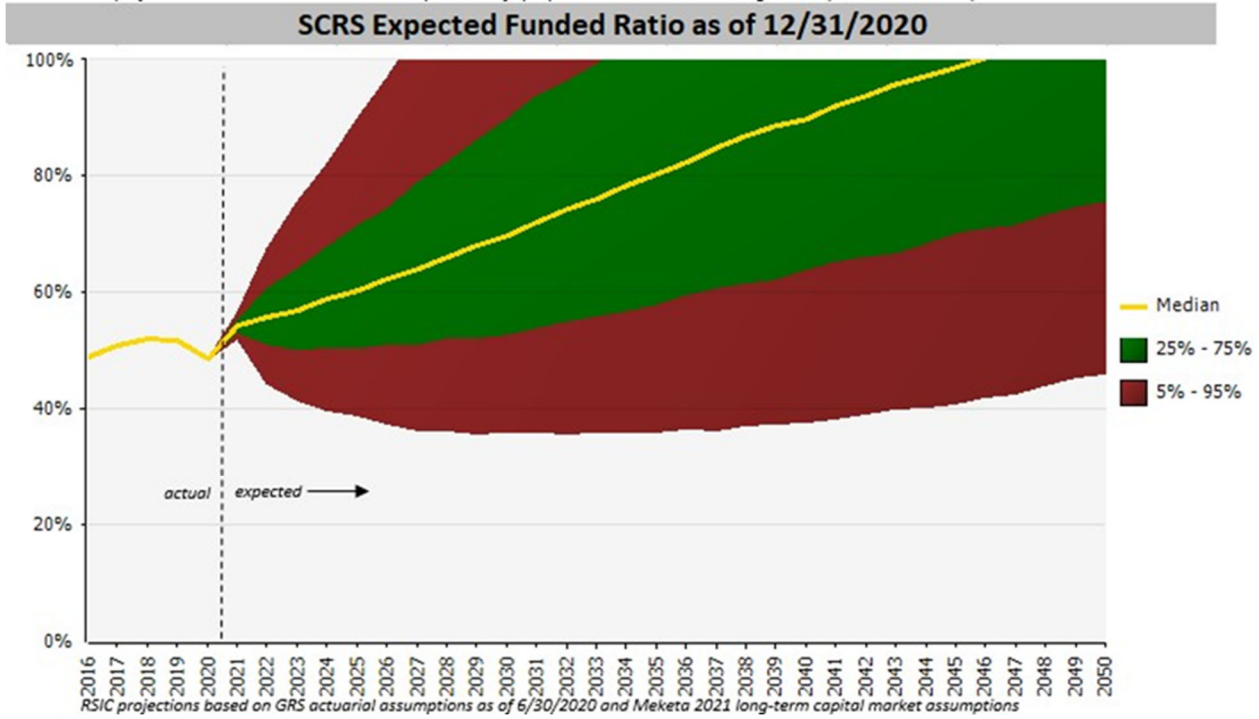


Table 17 - SCRS Expected Funded Ratio as of 6/30/2019 (2020)

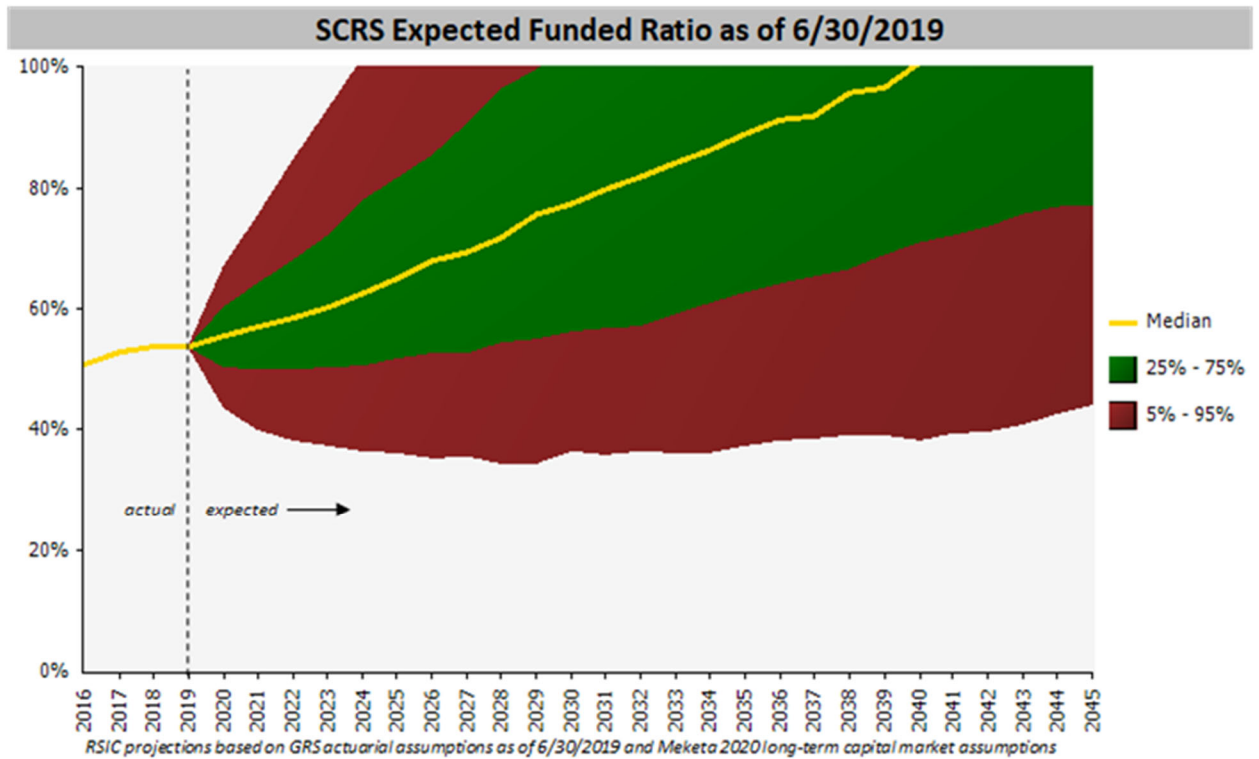


Table 18 - SCRS Expected Total Contribution Rate as of 6/30/2021 (2022)

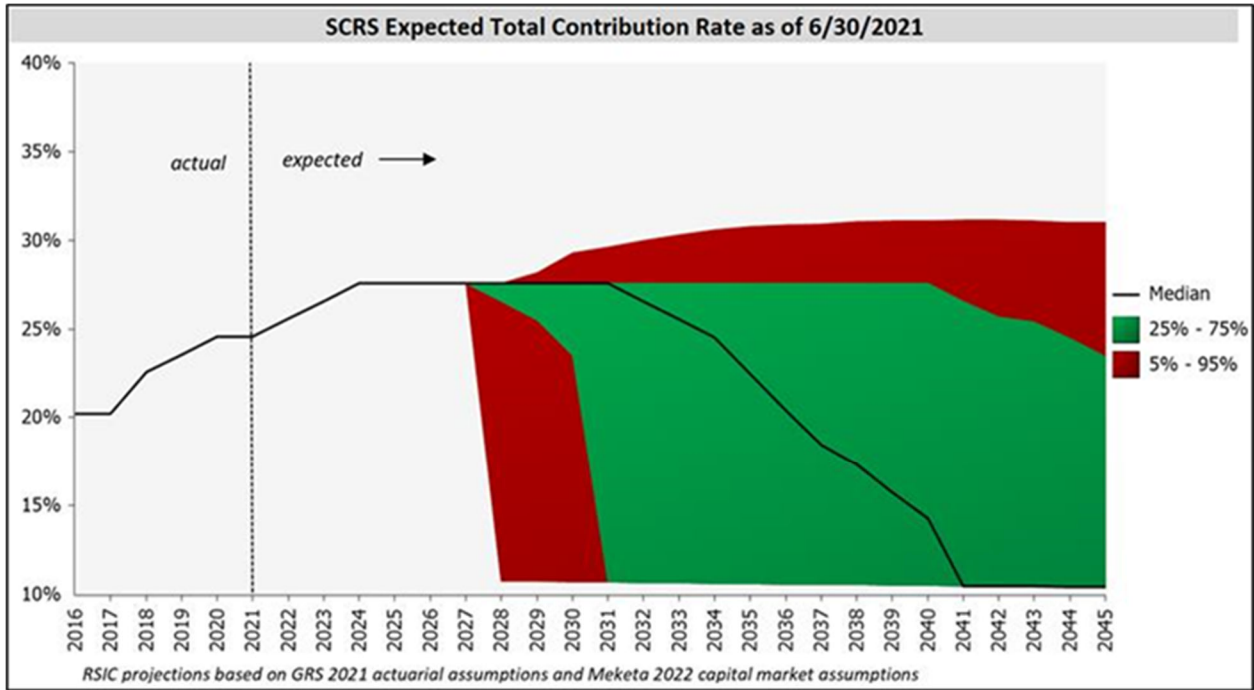


Table 19 - SCRS Expected Total Contribution Rate as of 6/30/2020 (2021)

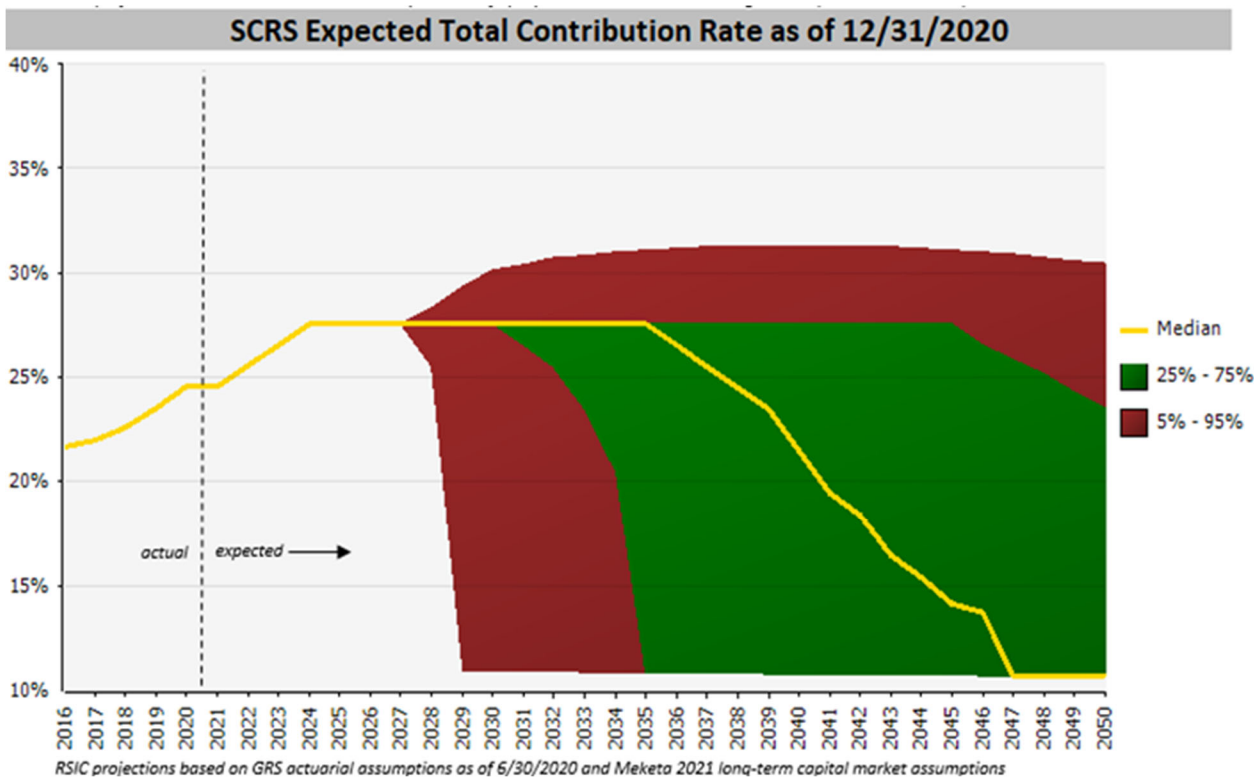
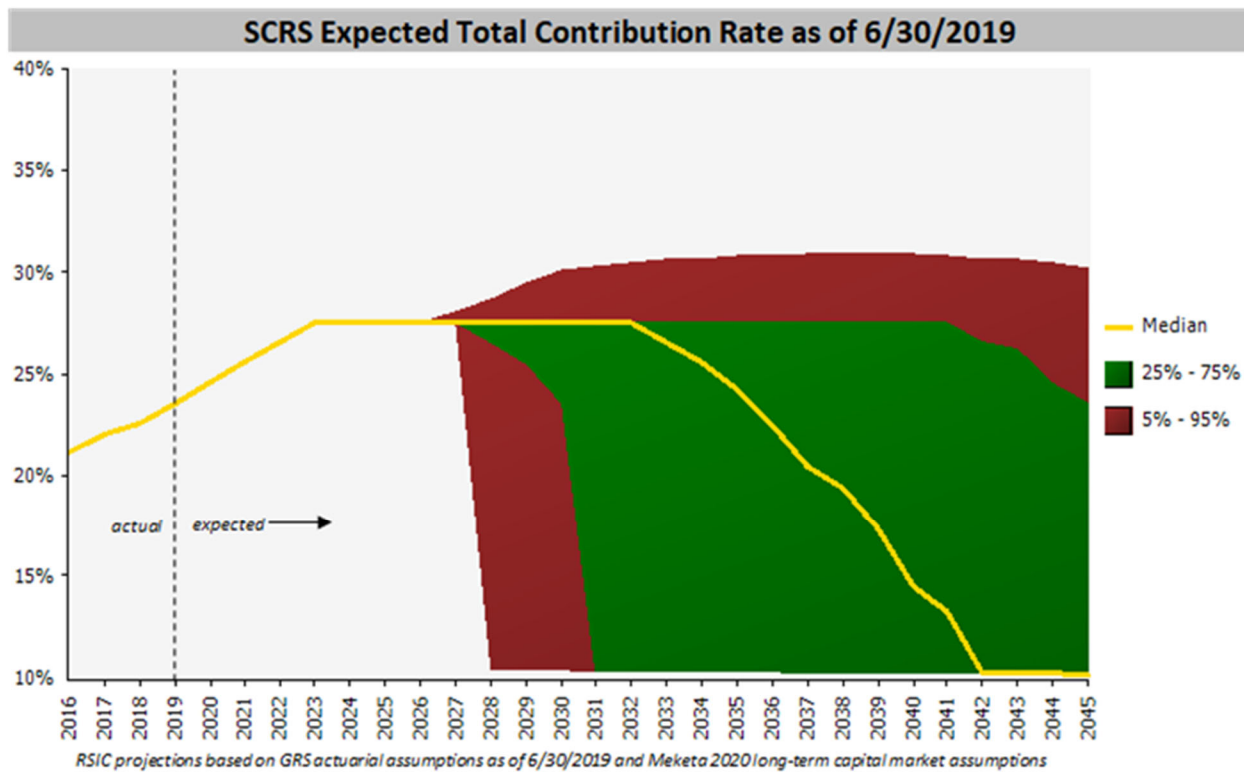


Table 20 - SCRS Expected Total Contribution Rate as of 6/30/2019 (2020)



**SOUTH CAROLINA  
RETIREMENT SYSTEM INVESTMENT COMMISSION**



**CONSOLIDATED ANNUAL INVESTMENT PLAN  
AND  
STATEMENT OF INVESTMENT OBJECTIVES AND  
POLICIES**

Effective July 1, 2026

## Role of this Document

The State of South Carolina administers five defined benefit pension plans: the South Carolina Retirement System (“SCRS”), the Police Officers Retirement System (“PORS”), the Retirement System for Members of the General Assembly (“GARS”), the Retirement System for Judges and Solicitors (“JSRS”), and the South Carolina National Guard Supplemental Plan (“SCNG”) (together, the “Plan”).

The South Carolina General Assembly established the Retirement System Investment Commission (“RSIC”) as a state agency in 2005 and provided it with the exclusive authority to invest and manage the assets of the Plan which it does in one group trust. RSIC is governed by an eight-member board (the “Commission”). The Commission is a co-fiduciary of the assets of the Plan along with the South Carolina Public Employee Benefit Authority Board (“PEBA”).

State law requires the Commission to adopt a Statement of Investment Objectives and Policies (“SIOP”) and to review it annually and to either amend it or reaffirm it. The SIOP establishes investment and performance objectives, policies and guidelines, roles, responsibilities, and delegation of authority for the management of plan assets. State law also requires RSIC’s Chief Investment Officer (“CIO”) to develop an Annual Investment Plan (“AIP”) which must be presented to and adopted by the Commission prior to May 1<sup>st</sup> of each year. Pursuant to state law, relevant portions of the SIOP may constitute parts of the AIP.

In order to ensure consistency and agreement between the SIOP and AIP, the Commission has consolidated the requirements of both into one document which it will review annually prior to May 1st. As part of the annual review, the Commission will amend or reaffirm, as it deems appropriate, those portions of this document intended to meet the requirements of the SIOP and the Commission will consider the CIO’s recommendation of any necessary changes to those portions of this document intended to meet the requirements of the AIP. In order to assist the Commission and the CIO in meeting their respective annual requirements, RSIC’s Chief Executive Officer (“CEO”) will provide a guide that designates those portions of this document that are required by the SIOP and those that are required by the AIP.

This Consolidated SIOP and AIP also serves as the RSIC’s strategic plan.

The Consolidated AIP and SIOP takes effect July 1, 2026.

## Table of Contents

I.	STRATEGIC PURPOSE, INVESTMENT OBJECTIVE, AND BELIEFS .....	4
II.	ROLES AND RESPONSIBILITIES.....	9
III.	ASSET ALLOCATION .....	11
IV.	STRATEGIC INITIATIVES.....	17
V.	INVESTMENT POLICIES .....	18
VI.	INVESTMENT AUTHORITY DELEGATION POLICY .....	29
VII.	SECURITIES LITIGATION POLICY (“POLICY”).....	32
VIII.	PLACEMENT AGENT POLICY .....	36
IX.	SUDAN DIVESTMENT POLICY .....	39
X.	LONG-TERM ANNUALIZED RETURN AND VOLATILITY EXPECTATIONS (VERUS 2025) .....	43
XI.	ASSET ALLOCATION HISTORY.....	44
XII.	TABLES 1 AND 2 (PRIOR YEAR VERSIONS) .....	51

## I. STRATEGIC PURPOSE, INVESTMENT OBJECTIVE, AND BELIEFS

### A. PURPOSE

The goal of the State’s five defined benefit plans is to provide a lifetime of benefits in retirement to those who have dedicated a career of public service to the State and its political subdivisions. The funding to secure this promise of benefits comes from two sources - contributions made by the employee and employer and the investment return earned on the assets of the Plan. The General Assembly has provided the Retirement System Investment Commission with the sole authority to invest and manage the assets of the Plan. Thus, RSIC’s purpose is to earn an investment return that aids in fulfilling the promise of benefit payments to our current and future retirees and their beneficiaries.

### B. INVESTMENT OBJECTIVE

RSIC’s primary investment objective is to design an investment program that produces a long-term rate of return that when added to contributions, funds current and future benefit payments. In doing so, RSIC must remain mindful that the Commissioners, CEO, and CIO are named fiduciaries to the Plan’s active employees, retirees, and their beneficiaries (collectively “beneficiaries”). The Plan’s fiduciaries must carry out their respective responsibilities to invest and manage the Plan’s assets solely in the interest of the Plan’s beneficiaries, for the exclusive purpose of providing benefits, and in keeping with the highest duty of care the law recognizes. As a result, the return the investment program seeks to achieve should involve taking a prudent amount of investment risk.

Further, RSIC cannot design an investment program in isolation, but must instead design a program consistent with the realities of the Plan that is guided by the Plan’s particular design, structure, and risk factors. An important guiding consideration is that the Plan is mature and until recently experienced net negative cash flows, in that the amount of annual contributions into the Plan were less than the annual amount of benefit payments flowing out of the Plan. It is expected that the Plan will begin experiencing net negative cash flows again in the future. As a result, the investment program must be designed in a way to provide sufficient liquidity to fund the net benefit payments to current retirees.

The investment program also must be guided by the consideration that the respective systems comprising the Plan are underfunded, in that the discounted liabilities of each system exceed the actuarial value of each system’s assets. The 2025 Actuarial Valuation report from the Plan’s actuaries shows the funded status of each system as:

SCRS	PORS	GARS	JSRS	SCNG
63.4%	71.3%	84.1%	52.2%	75.5%

The underfunded nature of the Plan presents the risk that the Plan’s assets will be insufficient to support future benefit payments. As a result, the investment program must also be designed in a way to grow the assets of the Plan to support payments to future retirees and their beneficiaries. The General Assembly did take significant action to address the underfunded nature of the Plan in the 2017 Pension Reform Bill. The 2017 Pension Reform Bill requires that the unfunded accrued actuarial liability (“UAAL”) amortization period for SCRS and PORS be reduced by one year each fiscal year until each plan reaches a twenty-year amortization period. In order to support meeting this requirement, the General Assembly significantly increased contributions into SCRS and PORS. It should be noted that because of these efforts, the funding

levels for both SCRS and PORS improved over the prior fiscal year and the amortization periods for both SCRS and PORS have been reduced to 12 and 11 years, respectively.

Thus, RSIC is tasked with designing an investment portfolio that balances the need to provide sufficient liquidity to fund expected net negative benefit payments in the foreseeable future, while also growing the portfolio to aid in providing benefits to future retirees.

Another guiding factor is that the General Assembly has set 7 percent as the assumed annual rate of investment return on the Plan's assets. The assumed rate of return not only serves as the discount rate to determine the net present value of the Plan's liabilities, but also serves as the primary driver of the Plan's funding policy. Investment performance relative to the assumed rate of return determines whether contribution rates are sufficient to meet the funding goals and requirements of the Plan.

RSIC realizes that investment performance will not meet or exceed the assumed rate of return every year, but rather strives to construct an investment portfolio that will meet or exceed this rate of return over time at a prudent level of market risk, in keeping with its fiduciary duty to the Plan's beneficiaries. RSIC recognizes that achieving a long-term rate of return that exceeds the assumed rate requires investing the portfolio in a greater percentage of assets with relatively high expected volatility. As a result, the investment portfolio will experience greater market volatility which not only impacts the probability of the investment return exceeding the assumed rate over time, but also correspondingly impacts the probability of reaching the funded status goals of the Plan without requiring additional contribution rate increases.

As a result, RSIC works to design an investment program that maximizes the probability that the Plan will meet the General Assembly's funded status goals, but also given the high level of contribution rates, strives to minimize the probability that the Plan will need additional contributions above those already required. RSIC believes that it can design an investment program with a significant probability of meeting or making significant progress towards both concerns as demonstrated by the stochastic analysis of our funded status expectations for SCRS set out in Table 1 below and a similar analysis of our contribution rate expectations set out in Table 2 below.

Table 1 - SCRS Expected Funded Status as of 6/30/2025

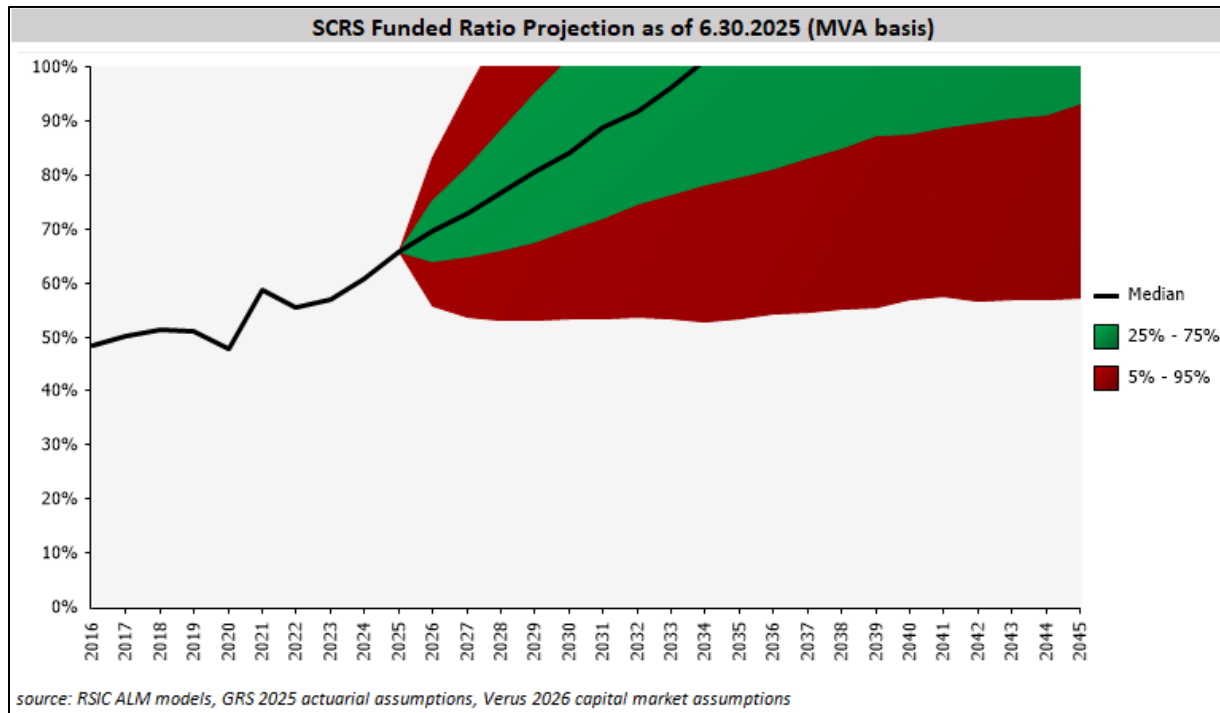


Table 1 tracks the actual, as well as expected, funded status of SCRS since 2016, the year prior to the passage of the 2017 Pension Reform Bill. SCRS is used as the example because its assets comprise the greatest percentage of the total assets of the five systems. The reason for the stochastic approach to the expected funded status is to demonstrate the impact of market volatility on the probable funded status of SCRS through time. The model upon which the simulation is based incorporates the actual structure, components, and assumptions of SCRS, including the contribution policy put into effect by the 2017 Pension Reform Bill. The model uses the Commission's Policy Portfolio, described below, as the investment portfolio and includes thousands of iterations based on the 2026 long-term capital market and volatility expectations provided by the Commission's Investment Consultant. The long-term expected return and volatility for the Policy Portfolio is discussed in Section III(D) below.

As can be seen in this table, the base case scenario is that SCRS reaches fully funded status by 2038, which is within the funded status goals set by the 2017 Pension Reform Bill. However, if the Plan were to experience the unfavorable 95th percentile scenario, the funded status of the Plan would not improve and would be expected to be in approximately the same funded position in thirty years that it is in currently.

The table also shows the actual improvement of the funded status of SCRS since 2016. The actual improvement shown on the table is attributable to additional contributions flowing into SCRS resulting from the 2017 Pension Reform Bill and better than forecasted investment returns since the bill's passage.

In addition to this stochastic analysis, the 2025 Actuarial Valuation shows the amortization period for SCRS as 12 years, which is ten years ahead of the 2017 Pension Reform Bill's requirement of 22 years. The PORS

2025 Actuarial Valuation shows the amortization period as 11 years, which is eleven years ahead of the 2017 Pension Reform Bill’s requirement of 22 years.

Table 2 - SCRS Expected Total Contribution Rate as of 6/30/2025

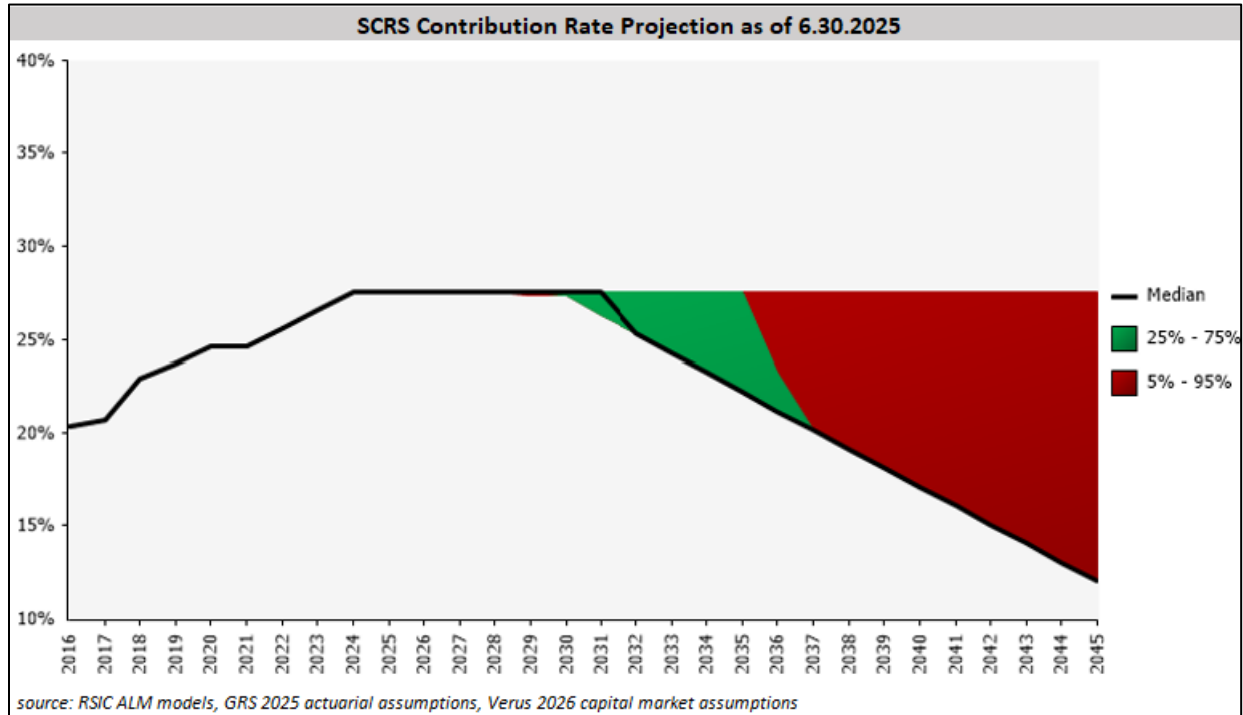


Table 2 tracks the actual, as well as expected, total employer and employee contribution rates for SCRS since 2016 and reflects that the combined contribution rate has increased to 27.56 percent pursuant to the 2017 Pension Reform Bill’s schedule. This table also employs a stochastic approach to the expected combined contribution rate to more accurately demonstrate a range of probable outcomes due to market volatility. This analysis is based on the same assumptions used to produce Table 1.

The Table also incorporates a sample glide path for contribution rate decreases. The sample glide path assumes that contribution rates will begin to decline by one percent per year in 2031, when the base case scenario for Table 1 reaches the 85 percent funded threshold. The 2017 Pension Reform Bill set the 85 percent threshold as the earliest point at which contributions may begin to be decreased. The sample contribution glide path is provided for example purposes only and should not be construed to predict with certainty when and how contributions will decline. However, if the Table sample glide path does reflect the actual Plan experience, then the combined contribution rate would be expected reach the 10.89 percent normal cost rate by 2045.. (Appendix XII contains historical versions of Tables 1 and 2 for each year since 2020 based on the corresponding year’s capital market expectations).

## C. BELIEFS

As fiduciaries, the Commission and staff of RSIC are charged with exercising their roles and responsibilities to the Plan's participants and beneficiaries with the highest duty of care that the law recognizes. In order to ensure consistency in approach to decision making that is commensurate with this fiduciary duty and focused on achieving the investment objective, the Commission and RSIC staff have adopted a set of core beliefs to ensure that we are collectively guided by a unifying set of principles.

### BELIEF 1

We believe that the Policy Allocation set by the Commission is the main driver of the investment portfolio's risk, return, and cost.

### BELIEF 2

We believe that investors must be rewarded for incurring additional risk, cost, and complexity.

### BELIEF 3

We believe that we are long-term investors which requires us to instill discipline and patience into our investment decision making and assessment process.

### BELIEF 4

We believe that achieving our investment objective requires an organization with strong governance, that maintains core values, and employs talented professionals.

In order to do this, we must:

1. establish a governance structure with clear lines of authority and means to assess the quality of decision making and resulting performance;
2. recruit and retain a talented investment and operational staff consistent with our Core Values of:
  - a. Humility,
  - b. Intellectual Curiosity, and
  - c. Team Player
3. achieve a deep understanding of value creation through the investment process;
4. emphasize risk awareness and focus on mitigating investment and enterprise risk; and
5. provide the foundation, infrastructure, and systems necessary to meet the investment objective and mitigate risk.

## II. ROLES AND RESPONSIBILITIES

1. In 2005, RSIC was established by South Carolina law to invest and manage the assets of the State's five defined benefit retirement plans. RSIC invests and manages the assets of all five plans in one group trust. RSIC is governed by an eight-member Commission. The Commission's primary purpose is to set the strategic direction for an investment program that is consistent with its fiduciary duty and strives to earn an investment return that when combined with contributions fulfills the promise of benefit payments to the Plan's current and future retirees and their beneficiaries. This includes setting a long-term strategic asset allocation that meets the Commission's investment objective, oversight of the implementation of the investment portfolio and the business affairs of RSIC, approving certain investments, ensuring legal and ethical integrity, and maintaining accountability. The Commission also adopts a series of governance policies that define the roles and responsibilities of Commissioners and staff and provide general guidance for the operation of RSIC as an agency. (RSIC Governance Policies can be found at <https://www.rsic.sc.gov/documents/Governance-Policy-Manual.pdf>).
2. The Commission employs a CEO, who serves as the primary figure of accountability for RSIC. The CEO serves as the chief administrative officer of RSIC as an agency and is charged with the affirmative duty to carry out the mission, policies, and directives of the Commission. The CEO is delegated the Commission's authority necessary, reasonable, and prudent to carry out the operations and management of RSIC as an agency and to implement the Commission's decisions and directives. The CEO also serves as the chief risk officer for the organization. The CEO is charged with employing a CIO and all other agency staff who serve at the will of the CEO. The CEO is also delegated the final authority to close all investments and must certify that investments made pursuant to the Commission's Investment Authority Delegation Policy meet the requirements of the policy (see Section VI for the Investment Authority Delegation Policy).
3. The CIO manages RSIC's investment functions subject to the oversight of the CEO. RSIC primarily invests Plan assets by allocating capital to external investment managers who implement specific investment strategies to provide the exposures necessary to meet the requirements of the Commission's strategic asset allocation. The Commission has implemented an Investment Authority Delegation Policy which provides the CIO with the final authority to invest with external investment managers subject to the limits of the policy. For a proposed investment that exceeds the delegation policy, the CIO determines whether the investment is presented to the Commission for final approval. The CIO is also granted certain authority to manage the implementation and exposure of the portfolio. The CIO through the management of the investment staff also oversees investment risk management, investment manager oversight, and other related activities.
4. The Executive Leadership Team ("ELT") is currently comprised of the CEO, CIO, Chief Operating Officer ("COO"), Chief Legal Officer ("CLO"), the Deputy Chief Investment Officer ("DCIO"), and Chief Human Resources Officer ("CHRO"), and serves as RSIC's primary management committee and aids the CEO in making strategic organizational and operational decisions.
5. The Internal Investment Committee ("IIC") is a committee of senior staff appointed by the CEO and is chaired by the CIO. The IIC's responsibilities are provided by the IIC Charter but the IIC is primarily responsible for serving as the committee that vets and recommends new investments to the CIO for approval and execution, or recommendation to the Commission for its approval.
6. The Commission engages a general investment consultant ("Investment Consultant"), who reports to the Commission and assists and advises the Commission on asset allocation, asset/liability study,

performance reporting, benchmarking/peer group comparisons, and general investment education and advice. The Commission Chair takes the lead in ensuring there is an effective and productive relationship between the Commission and the Investment Consultant and that the Investment Consultant has adequate clarity and direction in meeting the Commission's needs and requests. The CEO assists the Chair in managing the day-to-day relationship with the Investment Consultant and ensures effective collaboration and consultation between the Investment Consultant and RSIC staff. RSIC Staff may rely on the Consultant for data resources, external analyst inputs, and access to educational materials. The CEO may also retain specialty consultants to serve as an extension of RSIC staff in Private Equity, Private Debt, Real Estate, Infrastructure, and Hedge Funds.

7. The Internal Audit function is governed by the Commission's Audit and Enterprise Risk Management Committee and is primarily provided through external service providers. An internal staff member coordinates the relationship with external service providers and assists the committee with performing its duties and functions. The purpose of the Internal Audit function is to provide independent, objective assurance and recommendations designed to add value and improve RSIC operations. Internal Audit assists the entity in accomplishing its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.

8. The Enterprise Risk Management and Compliance ("ERM and Compliance") function reports to the CEO and serves as the primary staff to aid the CEO in fulfilling the role of chief risk officer. The ERM and Compliance function coordinates with the ELT and other staff on the assessment of, and provides oversight related to the identification and evaluation of, major strategic, operational, regulatory, informational, and external risks inherent in the business of RSIC. ERM and Compliance is also responsible for overseeing the process for monitoring compliance with RSIC policies and applicable laws.

9. The Public Employee Benefit Authority ("PEBA") is a separate agency that administers a comprehensive program of retirement benefits, performing fiduciary duties as stewards of the contributions and disbursements for the Plan. PEBA is responsible for producing GAAP basis financial statements for the Plan and maintains a general ledger to support that process. The financial statements that are produced by PEBA contain information regarding the investments made by RSIC and as such contain the official accounting records for Plan investments. The financial statements are presented in accordance with GAAP and comply with the Governmental Accounting Standards Board standards. The financial statements are audited annually by an independent audit firm hired by the State Auditor's Office.

10. The Commission and the PEBA Board serve as co-trustees of the Plan's assets. PEBA is the custodian of the Plan's assets and RSIC is responsible for the Plan's custodial banking relationship.

11. Subject to the approval of the State Fiscal Accountability Authority, PEBA designates the Plan's Actuary. The Commission is a third-party beneficiary to the contract with the Plan's Actuary, with full rights to all actuarial valuations prepared by the actuary.

12. The South Carolina General Assembly has the authority to control the budget and staffing for RSIC and to set the actuarial annual assumed rate of return for the Plan. Starting in early 2021, and every four years thereafter, in consultation with the Commission and the Retirement System's Actuary, PEBA proposed a 7 percent assumed annual rate of return to the General Assembly that took effect at the beginning of the 2021-2022 fiscal year because the General Assembly took no action to amend or reject the recommendation. The General Assembly also conducts periodic legislative oversight of RSIC.

### III. ASSET ALLOCATION

#### A. PURPOSE

The Commission's primary responsibility is to establish an investment program that is designed to meet the Commission's investment objective. The most significant action the Commission takes in fulfilling this responsibility is by setting the long-term strategic asset allocation. The Commission adopts a diversified portfolio that it expects to generate a long-term rate of return that meets its investment objective which is conditioned by its fiduciary duty to only expose the Plan's assets to a prudent level of market risk. The strategic asset allocation the Commission adopts is referred to as the Policy Portfolio. The Policy Portfolio is established with a long-term perspective and the Commission does not expect to change this portfolio to react to short-term market conditions or frequent fluctuations in capital market expectations.

The Commission recognizes employing a long-term perspective discourages the temptation to react to short-term market trends. This can help an investor to avoid chasing returns in asset classes that have become expensive due to recent appreciation. The Commission believes that adherence to this disciplined, long-term perspective will produce its greatest benefits in periods of adverse market conditions. During these times the Policy Portfolio will serve as a stabilizing force for the investment program.

State law also requires the Commission to diversify the assets of the investment portfolio and to consider: (i) general economic conditions; (ii) the possible effect of inflation or deflation; (iii) the role that each investment or course of action plays within the overall portfolio; (iv) the needs for liquidity, regularity of income, and preservation or appreciation of capital; and (v) the adequacy of funding for the Plan based on reasonable actuarial factors.

The Commission undertook a significant strategic asset allocation review in 2019-2020 with the goal of establishing a more simplified and effective Policy Portfolio. A synopsis of this review can be found in Section XI below. As a result of the review, the Commission adopted the Policy Portfolio in Table 3.

*Table 3 - Policy Portfolio Asset Class Weights as Adopted 2019-2020*

Asset Class	Weight
Public Equity	46%
Bonds	26%
Private Equity	9%
Private Debt	7%
Real Assets	12%

As part of the 2019-2020 review, the Commission adopted the discipline of only comprehensively reviewing the strategic asset allocation once every five years. In Fiscal Year 2024-2025, the Commission undertook its first comprehensive strategic asset allocation review pursuant to this discipline and the results of this review are set out below.

#### B. REFERENCE PORTFOLIO

A critical component in the Commission's process to establish the strategic asset allocation or Policy Portfolio is setting the Reference Portfolio. The Reference Portfolio is a simple two asset class benchmark portfolio comprised of stocks and bonds that serves as a risk reference for the Policy Portfolio. The

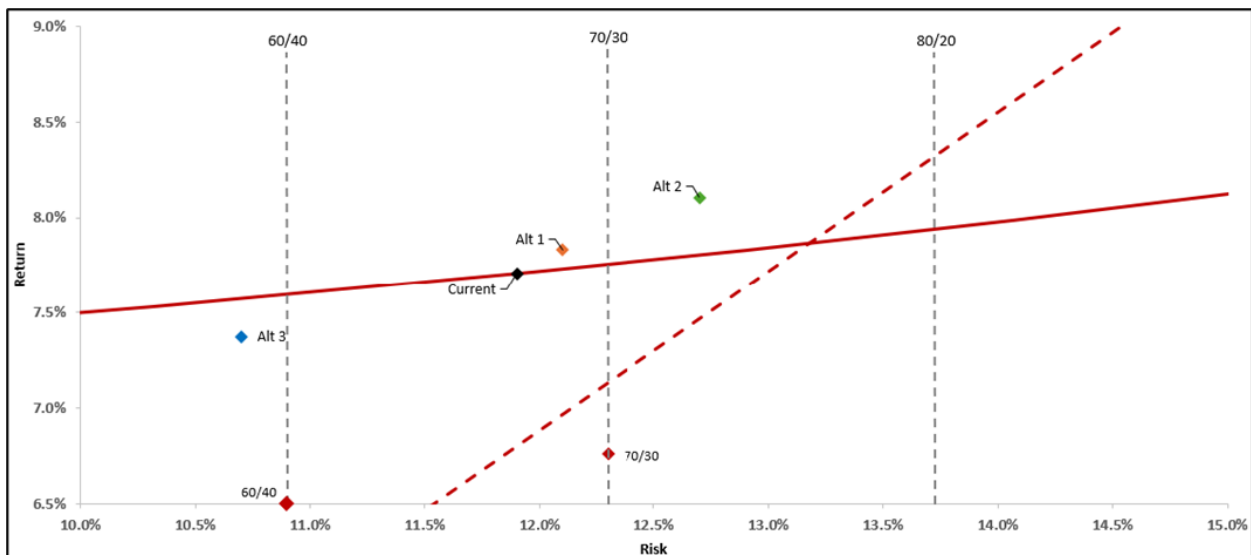
Reference Portfolio does not serve as a risk limit for the Policy Portfolio, but rather as a risk barometer to show the value of diversifying the Policy Portfolio into additional asset classes.

During its Fiscal Year 2024-2025 asset allocation review, the Commission was guided by the analysis in Table 4 below in setting the Reference Portfolio. The Commission sets the Reference Portfolio’s allocation as one consistent with the expected investment risk (as expressed in expected volatility) of a diversified portfolio of assets required to earn a return that is projected to exceed the assumed annual rate of return, or above the solid red line in Table 4, while also avoiding a greater than 5 percent probability of requiring additional contributions increases in the next ten years, or to the left of the dotted red line in Table 4. By avoiding the dotted red line, the strategic asset allocation would also avoid other significant plan risks that would fall to the right of the line plotted in Table 4.

In setting the Reference Portfolio, the Commission is mindful that South Carolina law provides that no more than seventy percent of the portfolio may be invested in equities. The law does not limit the types of assets that can make up the other thirty percent of the portfolio, which could conceivably include assets like high yield bonds which have an imbedded equity risk factor. However, the Commission believed it was prudent to constrain the Reference Portfolio to no more than seventy percent equity risk, as expressed by a seventy percent allocation to equities, and to mitigate the equity risk with a thirty percent allocation to bonds.

Using Table 4 as a guide, the Commission determined that a 70 percent Global Public Equities and 30 percent U.S. Bonds portfolio best represents the investment risk required for a diversified portfolio of assets to achieve the assumed annual rate of return over time while also avoiding a greater than five percent probability that contributions would need to increase in the next ten years. As a result, the Commission reaffirmed a 70 percent Global Public Equities (MSCI ACWI IMI Net) and 30 percent Bonds (Bloomberg Barclays US Aggregate) as the Reference Portfolio.

Table 4 - Analysis Used to Determine Reference Portfolio



### C. POLICY PORTFOLIO

The Commission establishes a Policy Portfolio to serve as the Commission’s long- term strategic asset allocation. The Policy Portfolio is a multi-asset class portfolio with expected volatility similar to the Reference Portfolio. A primary benefit of aligning the Policy Portfolio’s risk target to a risk equivalent Reference Portfolio is that doing so reveals the performance impact gained through diversification. However, unlike the Reference Portfolio, the Policy Portfolio is a portfolio that could expected to be held and, in any respect, creates a presumption of simplicity for the actual portfolio and requires complexity gained through portfolio implementation and manager selection decisions to demonstrate their value.

During its Fiscal Year 2024-2025 asset allocation review, the Commission considered alternative Policy Portfolios. The expected risk and return of the then-current Policy Portfolio as well as three alternative portfolios are shown in Table 4. Alternatives 1 and 2 had increased expected return and investment risk while Alternative 3 took less investment risk and correspondingly was expected to earn less return.

The Commission adopted Alternative 1 as the new Policy Portfolio because the Commission believes that it best optimizes the expected return and risk necessary to meet its investment objective. The Commission took into consideration that Alternative 1’s expected return exceeds the assumed rate of return and that the portfolio avoids a greater than five percent probability that contribution rates will need to increase in the next ten years as shown in Table 4. The Policy Portfolio’s allocation is set out in Table 5 below.

*Table 5 -Policy Portfolio Asset Class Weights*

Asset Class	Weight
Public Equity	43%
Bonds	25%
Private Equity	12%
Private Debt	8%
Real Assets	12%

In setting the Policy Portfolio’s asset allocation, the Commission is mindful of the role each asset class plays in the overall portfolio, with each asset class performing the primary role of providing growth, diversification, or yield, as summarized below and in Table 6:

**Public Equity:** This asset class includes investments in the stock of publicly traded companies. The purpose of public equity in the portfolio is growth. The excess return expectations for this asset class are low. The asset class is highly liquid and can be accessed with minimal implementation cost.

**Bonds:** This asset class includes investments in debt securities issued by governments, corporations, or other issuers. The primary purpose of bonds in the portfolio is diversification and the secondary purpose is to provide yield. The excess return expectations for this asset class are low and the asset class is expected to provide a persistent source of return while remaining highly liquid. The asset class is also expected to serve a stabilizing function in times of market stress.

**Private Equity:** This asset class includes equity investments in privately held companies. Investors have historically been compensated with incremental return over comparable public equity investments in exchange for lower liquidity and increased business risk as compared to the public markets. The primary role of private equity in the overall portfolio is growth. Even though other asset classes are also expected

to generate persistent excess returns over time, Private Equity is expected to achieve a greater magnitude of excess return as measured over three and five -year time periods. It has a significantly higher cost of implementation as compared to public equity.

**Private Debt:** This asset class includes investments that provide alternative financing to businesses or assets and are in competition with traditional capital market or bank financing. Investors are compensated with incremental return over what can be achieved through traditional forms of lending in exchange for lower liquidity as compared to liquid credit markets and for serving as a solutions provider to these businesses. The primary role of this asset class in the portfolio is yield. Private Debt is expected to achieve a more consistent three-year excess return over its public market benchmark.

**Real Assets:** This asset class includes investments in physical assets like real property and infrastructure, as opposed to financial assets like stocks and bonds. The primary role of this asset class is diversification with the secondary purposes of providing inflation protection and yield. The asset class is expected to offer limited liquidity and greater consistency of excess return over three-year periods.

*Table 6 - Roles and Expectations of Asset Classes*

	Public Equity	Private Equity	Bonds	Private Debt	Real Assets
Primary role in portfolio (asset allocation)	Growth	Growth	Diversification	Yield	Diversification
Secondary role in portfolio (asset allocation)			Yield		Yield
Return expectation (20Y benchmark return)	High	> Public Equity	Low	> Bonds	Moderate
Alpha expectation where active: magnitude vs. cost	Low	High	Moderate	Moderate	Moderate
Consistency of excess return	Low	Moderate	Moderate	High	High
Expected liquidity	Very High	Very Low	Very High	Low	Low
RSIC Target Portfolio Expected Cost	Low	High	Low	Moderate	Moderate

A crucial component of the asset allocation review process is to ensure that appropriate benchmarks are used for the Policy Portfolio. The Commission was guided by the CFA Institute’s recommendations that benchmarks are (i) specified in advance, (ii) appropriate, (iii) measurable, (iv) unambiguous, (v) reflective of investment options, (vi) owned, and (vii) investable. In its Fiscal Year 2024-25 strategic asset allocation review, the Commission reached consensus on the benchmarks listed in Table 7 for the Policy Portfolio.

*Table 7 - Benchmark by Asset Class*

Asset Class	Benchmark
Public Equity	MSCI ACWI IMI Net
Bonds	Bloomberg Barclays Aggregate
Private Equity	Burgiss Private Equity
Private Debt	S&P LSTA +150 bps

Real Assets	75% ODCE / 25% Burgiss Core USD Infrastructure > \$1 billion
-------------	--

Based on the 2026 Capital Market Expectations provided by the Commission’s Investment Consultant that the Commission utilized when reaching consensus on the Policy Portfolio, the Policy Portfolio is expected to yield a thirty-year annualized rate of return of 7.3 percent with an expected volatility of 11.7 percent. The Commission believes that the Policy Portfolio’s expected return and volatility are sufficient to meet its long-term investment objective.

#### D. IMPLEMENTATION PORTFOLIO BENCHMARK

The Commission recognizes that the CIO and investment staff may add value by structuring the Actual Portfolio in a manner that deviates from the Policy Portfolio target weights or may also pursue a strategy that causes the composition of an asset class to differ from the policy benchmark. As a result, the Commission provides the CIO and the investment staff with the discretion to structure the portfolio differently than the Policy Portfolio within the asset class and sub-asset class ranges shown in Table 8. In order to measure the risk and return impact of these portfolio structure decisions, the Commission employs an Implementation Portfolio Benchmark that aggregates the underlying benchmarks of each asset class and sub-asset class strategy according to their actual weights. Providing this discretion while establishing a structure that measures the value of these decisions also sets the right balance of accountability for Commission decisions and those of the CIO and investment staff.

*Table 8 - Asset Class and Sub-Asset Class Ranges*

Asset Class	Target	Low	High
Public Equity	43%	30%	55%
Bonds	25%	10%	35%
<i>Non-Index Investment Grade</i>	0%	0%	10%
<i>Non-Investment Grade</i>	0%	0%	10%
<i>Net Cash/Short Duration</i>	0%	0%	8%
Private Equity	12%	5%	20%
Private Debt	8%	5%	13%
Real Assets	12%	6%	18%
<i>Real Estate</i>	9%	6%	14%
<i>Infrastructure</i>	3%	0%	6%

#### E. MANAGER SELECTION

The Commission also recognizes that the CIO and investment staff strive to add additional value through manager selection. In September 2017, the Commission adopted an Investment Delegation Policy that delegated investment manager selection decisions to the CIO and investment staff within clearly defined limits and exceptions, subject to the CEO’s oversight. The Investment Authority Delegation Policy is set out in Section VI. The value of manager selection is discernable by comparing the Implementation Portfolio Benchmark and the Actual Portfolio.

#### F. PERFORMANCE REPORTING

Essential to the Commission’s oversight function is performance reporting that makes clear the value of three major investment decisions: diversification, portfolio structure, and implementation. The

Commission requires staff to provide a Portfolio Reporting Framework that easily allows the Commission to judge the value of these three investment decisions by comparing the relative performance between the Reference Portfolio, Policy Portfolio, Implementation Portfolio, and Actual Portfolio:

1. Diversification (Policy Portfolio Benchmark vs. Reference Portfolio Benchmark): The comparison of the Policy and Reference Portfolios Benchmarks reveals the value from diversification beyond a simple two-asset portfolio. The benefit of designing these portfolios with the same level of expected volatility is that the performance differential is an indication of the impact of diversification, rather than being a function of an expected risk differential. Although the effects are reported over shorter periods, the Commission should expect to see the value of diversification in this comparison over rolling five-year periods. Although these portfolios were established with the same level of expected volatility, the risk of these portfolios is expected to diverge during discrete periods of time but would generally be expected to rise and fall together over time.
2. Portfolio Structure (Implementation Portfolio Benchmark vs. Policy Portfolio Benchmark): This comparison supports an assessment of the quality of the portfolio structure. It reveals the performance impact of the decisions to structure the portfolio differently than the Policy Portfolio Benchmark. These impacts can be broken down into those that result from the weights of asset classes and those that result from the composition of asset classes. Although the effects are reported over shorter periods, the Commission should see the positive performance impact of implementation benchmark decisions over rolling three-year periods. The reporting framework also include risk reports to highlight whether and how changes in portfolio structure alter the risk characteristics of the portfolio.
3. Implementation (Actual Portfolio vs. Implementation Portfolio Benchmark): This comparison aids in evaluating the quality of implementation, a key component of which is the impact of manager selection. The Commission should expect to see differential individual manager performance as compared to the implementation benchmark over short periods of time, but the Commission should expect in aggregate to see consistent value added through manager selection. Providing this additional comparison between the Actual Portfolio and the Implementation Benchmarks also disaggregates the performance gained through portfolio structure and that gained through manager selection. This additional look through provides the Commission with an enhanced ability to effectively exercise oversight over both portfolio structure and investment manager selection decisions made by the investment staff.

## **G. ASSET ALLOCATION REVIEW**

The Commission will conduct an Asset-Liability Management Study and asset allocation review every five years. The Commission will continue to receive long-term capital market expectations from the Investment Consultant annually and assess the impact to the expected return and volatility of the Reference and Policy Benchmark Portfolios. However, consistent with its beliefs and long-term approach to asset allocation, the Commission intends to limit interim asset allocation changes to those the Commission determines are absolutely critical to meeting its long-term investment objective and are commensurate with its risk tolerance and fiduciary duties. Consistent with this provision, the Commission conducted a strategic asset allocation review in Fiscal Year 2024-2025.

#### **IV. STRATEGIC INITIATIVES**

The Strategic Initiatives described in this Section are major ongoing staff projects contemplated to last up to three years and are likely to have a more significant impact to the portfolio, asset class, or an investment strategy than typical decisions. The CIO will include changes to these initiatives as part of the annual AIP proposal and will provide a quarterly update on progress towards these initiatives at regular Commission meetings.

## V. INVESTMENT POLICIES

### A. GENERAL

1. The Commission and staff must only consider pecuniary factors when making an investment decision or when allocating capital to an external investment manager. A “pecuniary factor” is a factor that a prudent person in a like capacity would reasonably believe has a material effect or impact on the financial risk or return on an investment, including a factor material to assessing an investment manager’s operational capability, based on an appropriate investment horizon consistent with a retirement system’s investment objectives and funding policy. The term excludes “non-pecuniary factors” which is any factor or consideration that is collateral to or not reasonably likely to affect or impact the financial risk and return of the investment and include but are not limited to the promotion, furtherance, or achievement of environmental, social, or political goals, objectives, or outcomes. The closing documentation of every investment must include the CEO’s certification that the decision to make the investment is based on pecuniary factors and is not being made to promote, further, or achieve any nonpecuniary goal, objective, or outcome.
2. Internal Investment Committee (IIC) and Investment Approval Process - State law provides that the AIP is to be implemented by the Commission through the CIO. RSIC employs a team of investment professionals that support the CIO in carrying out investment management duties and responsibilities. One key component of this infrastructure is the IIC. The IIC assists the CIO by reviewing and providing recommendations to the CIO regarding proposed investments. The IIC also routinely monitors the Portfolio’s investment performance and reviews relevant policies and procedures as part of its oversight function. The Commission adopted an Investment Authority Delegation Policy which grants the CIO the ability to approve those investments which fall within the parameters of this policy, subject to the oversight of the CEO. Other investments are presented to the Commission for its approval.
3. Due Diligence – The Investment Team maintains investment due diligence policies to provide consistency and oversight to the investment process. The Initial Due Diligence Policy outlines the key tenets of the RSIC’s decision-making process in hiring investment managers. The Ongoing Due Diligence Policy outlines the process and criteria used to evaluate the retention/termination of external investment managers. Both due diligence policies are tested annually by either an Agreed Upon Procedures review by an independent auditor or by the Director of Enterprise Risk Management & Compliance. The results of this review are provided to the Audit and Enterprise Risk Management Committee.
4. Counterparty Risk Management – The Quantitative Solutions Group monitors two sources of potential counterparty risk: (1) the overlay program and (2) the System’s master custodial bank. While the risk arising from the overlay program is actively monitored by its external manager, as an added layer of oversight, the Quantitative Solutions Group is responsible for reviewing and reporting on the external manager’s prudent management of these counterparty risks.
5. Investment Strategies, Objectives, and Performance Standards
  - i. In Section III(D), the Commission described the characteristics and established the role each asset class plays in the Policy Portfolio. Within defined limits and constraints, the Commission provides the CIO and investment staff the ability to structure the portfolio for each asset class in a manner that fulfills the role the asset class plays in the portfolio. The investment staff maintain a “Baseline” document for each asset class that creates a shared understanding of how the portfolio will be structured to achieve the purpose of the asset

class established by the Commission. In general, the annual plan for an asset class will involve measures designed to improve its alignment with its Baseline. The following items are detailed in the Baseline document:

- a. The rationale and purpose of the asset class established by the Commission;
  - b. Target steady-state asset class exposures (including sub-strategies, geographies, or other relevant factors);
  - c. The target return, characteristics (income vs. appreciation), and expected active vs. passive implementation breakdown, and
  - d. An estimate of normal cost to implement the portfolio, and an estimate of the flex cost which may be incurred when market conditions present compelling opportunities.
- ii. Baselines also address the following broader issues:
    - a. The role private investments play in the Portfolio;
    - b. The mix of private vs. public market investments;
    - c. How the portfolio is likely to change over time, and
    - d. The annual commitment pacing plan for each illiquid asset class.
  - iii. The Baseline document is reviewed and updated, as necessary, at least annually, and all RSIC staff are encouraged to present suggested revisions to any Baseline. Proposed changes to the Baseline documents are presented to the IIC for review and to the CIO for approval. In addition to addressing the investment objectives and performance standards for each asset class, the Baseline also serves as a guide to workflow and portfolio management decisions. Investment decisions are reviewed against the Baseline for portfolio fit.
  - iv. As part of the individual asset class in-depth examination at each Commission meeting, the investment staff will also provide a review of the particular asset class Baseline, progress towards attaining the Baseline, and any material deviations from the Baseline.
  - v. The Commission will be informed promptly of any material change to a Baseline at the next Commission meeting following the change.

## 6. Allowable Investments and Limitations

- i. With certain limitations discussed below, State law provides that RSIC may invest “in any kind of property or type of investment consistent with” Title 9, Chapter 16 of the S.C. Code and Section 9-1-1310. These investments include, but are not limited to, futures, forward contracts, swaps, and options, equities, bonds, loans, 144(A)’s, exchange traded funds, American Depository Receipts, real property, and real estate investment trusts. These investments may be listed, exchange traded, or over the counter, negotiated contracts or investments.
- ii. In addition to the instruments outlined above, for every asset class, a variety of investment structures may be utilized depending on the nature of a particular investment. In accordance with the terms of the investment limitations outlined in this policy, these structures may include, but are not limited to, mutual funds, limited partnerships, limited liability companies, strategic partnerships, trusts, commingled vehicles, fund-of-funds, and separately managed accounts in which assets may be held by either the Retirement

System's master custodial bank or an external custodian who is selected and monitored by the external manager or general partner.

- iii. Any investment structure and the underlying instruments must be of a type generally expected to obtain exposure to an asset or sub-asset class contained in Table 8, Section III. State law imposes certain limited restrictions on the investment of the Portfolio. The managers of the Portfolio's accounts other than index funds, commingled funds, limited partnerships, derivative instruments, or the like, are required to assist the Commission in meeting its obligations under S.C. Code Ann. §9-16-55, which sets forth limitations on investment in certain types of companies that are engaged in active business operations in Sudan. See Section IX for additional information.
- iv. The Commission has also established a policy prohibiting an investment in any security or obligation issued by a company or a corporation that is a known sponsor of terrorist organizations or of a company domiciled in a country that is a recognized sponsor of terrorism or terrorist organizations as based on reports from the Office of Terrorism and Financial Intelligence of the Department of Treasury and the Country Reports on Terrorism by the Office of the Coordinator for Counterterrorism of the U.S. State Department.

7. Internal Management and Overlay Program – Currently, the staff performs distribution management which is the management and disposition of in-kind distributions received from external investment managers or third parties. In addition, the CIO has discretion to use synthetic instruments, derivatives, equity baskets, and exchange traded funds in order to implement the asset allocation or otherwise manage the portfolio in accordance with the ranges established by the Commission. The Overlay program functions as a means by which the CIO and Investment Staff manage and modify exposures and manage risk in an efficient manner using synthetic instruments, exchange-traded funds/notes, equity or fixed income baskets, options, futures, swaps, and forward currency contracts.

8. Portable Alpha – The Commission provides the CIO with the discretion to use Portable Alpha Strategies not to exceed 15 percent of total plan assets. The use of Portable Alpha is an implementation decision that is reflected in the Implementation Portfolio Benchmark. The benchmark for Portable Alpha Strategies is the Secured Overnight Financing Rate (SOFR).

9. Alternative Investments – The Commission has established guidelines applicable to its alternative investments, which include Hedge Funds and Private Markets Assets:

- i. The Commission's initial commitment to a fund will not exceed 25 percent of the committed capital of that fund, unless the Commission, or the CEO for a delegated investment, specifically waives or suspends this restriction (a) in order to take advantage of a new firm or product that has not yet built an asset base, or (b) in the case of a fund that has been created specifically for RSIC (e.g., a single LP fund) or specifically for RSIC and a limited number of other investors (e.g., two member LP fund or LLC). The closing certification for any delegated investment for which the CEO waives this requirement must conspicuously note that this limitation is being waived and identify the basis for the waiver;
- ii. Unless otherwise approved by the Commission, no more than 15 percent of an alternative asset investment allocation may be invested with a single manager, general partner, or single fund, with the exception of Funds of One and Strategic Partnerships; and

- iii. Staff will notify the Commission if the combined exposure to Private Equity, Private Debt, and Private Real Assets exceeds 40 percent of total plan assets.

10. Equity investments not to exceed 70 percent – State law provides that the AIP must also include the minimum and maximum allocations to equity investments on an ongoing basis, not to exceed 70 percent. The allowable ranges for equity investments are set forth in Table 8, Section III(E). While State law does not stipulate whether the limitation of 70 percent is based on cost or market value, the Commission manages this limitation by the amount of exposure to equity on a market value basis. Therefore, if the exposure to equity investments exceeds 70 percent of the total market value of the Portfolio, the CIO is required to rebalance the Portfolio.

11. Managing Cost – In accordance with State law, the AIP addresses methods for managing the costs of RSIC’s investment activities. RSIC strives to earn the highest risk-adjusted return on a net of fees basis and recognizes that cost is an important variable to consider. The Investment Team actively engages in an array of strategies to reduce the cost of the Portfolio, including the following:

- i. Increasing the initial investment size;
- ii. Seeking aggregation discounts from firms with which RSIC has multiple investment strategies;
- iii. Utilizing co-investments in private markets;
- iv. Quantifying and monitoring the effectiveness of active implementation across public market asset classes; and
- v. Requesting reductions to, or elimination of, management fees, as appropriate.

12. Risk

- i. All investments carry some degree of risk. The focus of RSIC’s risk function is managing and monitoring these risks to ensure that the Portfolio’s risks are appropriate and that the overall level of risk taken is consistent with meeting the Commission’s investment objective. Key risk initiatives are:
  - a. Incorporating the Plan’s liability structure into the investment decision process; and
  - b. Developing and refining tools to facilitate the incorporation of the Plan’s liabilities into portfolio management.
- ii. RSIC Staff monitors risk levels both in absolute terms, but also in relation to the Reference Policy benchmark established by the Commission’s asset allocation. This is accomplished using a mix of proprietary and third-party systems and tools.
- iii. At the Portfolio level, Staff will:
  - a. Maintain the Portfolio’s asset allocation within the limits established by this policy;
  - b. Employ an appropriate level of diversification and adhere to the limits within this policy or as contracted with the manager;
  - c. Adhere to policies and procedures established by the Commission; and
  - d. Maintain adequate liquidity for benefit payments and capital calls.

- iv. Staff provides the Commission with risk reporting as part of the Portfolio Performance Framework to ensure that risk remains within acceptable levels and to judge the value of portfolio structure and manager selection decisions on a risk adjusted basis.

13. Manager Monitoring Guidelines - RSIC Staff maintains an Ongoing Due Diligence Policy that outlines the manager monitoring requirements in detail. In summary, the Investment Team is required to perform periodic reviews of each active manager. These reviews contribute to the decision to either retain or terminate that manager. These reviews involve both quantitative and qualitative assessments in order to ensure that any decision is made fairly and consistently, and to avoid untimely or undisciplined decisions that may adversely impact returns. Additionally, the CIO is briefed by an RSIC operations team member on the audited financial statements annual reviews, compliance certifications, and investment fees. Compliance with the Ongoing Due Diligence Policy is reviewed annually through an Agreed Upon Procedures audit performed by an independent auditor.

14. Proxy Voting

- 1) Shareholder proxy votes must be cast in a manner in keeping with fiduciary duty and in a manner that is consistent with the best interest of the trust fund, based on pecuniary factors, and most likely to maximize shareholder value over an appropriate investment horizon. Any engagement with a company regarding the exercise of shareholder proxy votes or the proposal of a proxy question must be based on pecuniary factors and for the purpose of maximizing shareholder value, except that RSIC may engage with a company to express opposition to the proposal of or the merits of a proxy question that does not have a pecuniary impact.
- 2) To the extent that it is economically practicable, RSIC must retain the authority to exercise shareholder proxy rights for shares that are owned directly or indirectly. RSIC may retain a proxy firm or advisory service to assist it in exercising shareholder proxy rights, but only if the proxy advisor has a practice of and commits to follow proxy guidelines that are consistent with the requirements of item (1).
- 3) RSIC may only allocate capital to a public equity investment strategy if the manager of the investment strategy has a practice of and commits in writing to meet the requirements of item (1), unless it is not economically practicable to do so, or it is necessary to avoid the concentration of assets with any one or more investment managers. For any public equity investment strategy for which the manager does not have a practice of and does not commit in writing to meet the requirements of item (1), a summary of the terms, fees, and performance of the investment must be included in RSIC's annual investment report and published in a conspicuous location on the RSIC's website.
- 4) The Commission must annually review compliance with this section regarding the exercise of shareholder proxy rights. The Commission must review a report that summarizes the votes cast by or on the Commission's behalf or at the Commission's direction. The report must include a vote caption, RSIC's vote, the recommendation of company management, and the recommendation of any proxy advisor retained by RSIC. This report must be posted in a conspicuous location on the Commission's website.
- 5) The Commission finds that the provisions of Section 9-16-30(G) of the South Carolina Code are intended to apply to public equity investments and are not intended to apply to private equity investments given the nature, structure, and characteristics of private equity investments.

## B. COMPLIANCE

1. Placement Agent Policy – State law prohibits RSIC from making an investment where a placement agent receives compensation in connection with RSIC’s investment. The Commission’s Placement Agent Policy is set out in Section VIII.
2. Investment Manager Sourcing and Conflict Disclosure Policy – In order to enhance transparency and avoid even the appearance of impropriety, before an investment recommendation is made to the Commission or CIO, any Commissioner or RSIC staff member involved in the sourcing or due diligence of a new investment must disclose any conflict with the proposed investment. Additionally, the CEO and CIO must disclose any conflict with any proposed investment.
3. Annual Certification and Ongoing Testing of Guideline Compliance – The Ongoing Due Diligence Policy requires each manager to annually certify its compliance with the contractually specified guidelines. These certifications are compiled by RSIC Compliance and reviewed by the Director of Operational Due Diligence (“DODD”) who then ensures the results of the review are reported in the CIO. Compliance with the manager certification process is reviewed annually through an Agreed Upon Procedures Audit performed by an independent auditor. For public markets mandates which are governed by an Investment Management Agreement and custodied with the master custodial bank, automated reports are generated and reviewed on those mandates that can be monitored electronically.

## C. GOVERNANCE AND OVERSIGHT

1. Performance Standards and Reporting - As noted above, State law requires that the AIP address the Commission’s performance standards. The performance standards and benchmarks are described in Section III. In addition, RSIC receives monthly performance reports from the custody bank and the Commission receives quarterly performance reports prepared by RSIC’s performance reporting staff and the general investment consultant. The performance reporting prepared by RSIC performance reporting staff must incorporate the Portfolio Performance Framework required in Section III.
2. Diversification – State law requires that the AIP address the topic of diversification, including sectors, issues and other allocations of assets that provide diversification in accordance with prudent investment standards. The Commission provides the CIO with parameters regarding its diversification objectives through the asset allocation, asset and sub-asset allocation ranges, and performance standards set out in Section III. The Portfolio Reporting Framework required in Section III also provides the Commission the ability to oversee the implementation of the long-term portfolio strategy, as well as the actual implementation of the Commission’s diversification directives.
3. Procedures regarding consultants, managers, service providers selections and terminations
  - i. Selection - State law requires that AIP include procedures and policies for selecting, monitoring, compensating, and terminating investment consultants, equity investment managers, and other necessary professional service providers. Investment managers are primarily selected by the CIO, subject to the oversight of the CEO, pursuant to the Investment Authority Delegation Policy through an investment process that also complies with the Investment and Operational Due Diligence Policies. The CIO recommends to the Commission for its approval the selection of any manager of an investment that exceeds the limits of or falls into one of the exceptions to the investment delegation policy. Any investment recommended to the Commission for its approval must also comply with the Investment and Operational Due Diligence Policies. All other service providers are selected

pursuant to the Commission's Service Provider Selection Policy which is included in the Commission's Governance Policies (RSIC Governance Policies can be found at: [https://www.rsic.sc.gov/\\_documents/Governance-Policy-Manual.pdf](https://www.rsic.sc.gov/_documents/Governance-Policy-Manual.pdf))

- ii. Compensation, Fees and Expenses – Service providers, including consultants and investment managers, will be compensated commensurate with the services provided and industry practices. The Commission will pursue cost savings through structural efficiencies and will strive for fee reductions through negotiations. Investment management fees are evaluated utilizing several metrics or tests. First, fees are examined relative to industry/peer standards. Second, when it reviews potential new mandates or restructurings of existing allocations, the investment staff assesses fees based on the cost relative to other implementation options. For example, in global public equities, the fees charged by active managers (as well as their expected performance and risk) are compared to other methods of obtaining similar market exposure, while in the private markets, fees (as well as expected performance and risk) are compared to public market implementation alternatives. Lastly, to the extent practicable, fees will also be evaluated based on an assessment of the manager's ability to generate excess returns. Investment Staff gathers actual fees and provides annual public disclosure of all fees paid to external managers. The Commission receives an annual report on the cost of its investment program from an independent expert and may also call upon its investment consultants for assistance in analyzing and addressing issues relating to investment fees. Operating expense applicable to internal investment operations and the general business of the RSIC are managed by the CEO within the parameters of the annual budget approved by the General Assembly.
- iii. Term and Termination -The Commission or the CIO, as applicable, may terminate an investment manager whenever the Commission or CIO determines that its objectives can more efficiently or effectively be met by the selection of another manager or under a different management mandate. The Commission and CIO retain the right to terminate a manager with or without cause and at any time. It should be noted that termination rights may not apply to certain types of investment structures (e.g., typical private markets funds). Circumstances which suggest an immediate review and a possible termination include, but are not limited to, the following:
  - a. Manager changes strategy or investment style;
  - b. Critical elements of the investment process have deteriorated;
  - c. Transaction costs are unreasonable;
  - d. Management fees are higher than similarly styled managers for similarly sized portfolios;
  - e. Manager is unable to meet the performance expectations within the risk tolerance specified;
  - f. Material organizational or personnel changes;
  - g. Manager is not complying with the applicable provisions of the Commission's SIOIP; and
  - h. Manager is not complying with the applicable provisions of the Commission's AIP.
4. Delegation of Authority to CIO - State law requires that the AIP and SIOIP contain a detailed description of the delegation of final authority to invest made by the Commission. The Commission has

delegated its final authority to invest to the CIO, subject to the oversight of the CEO, generally in the following amounts:

- a. not to exceed 100 bps of plan value per investment for illiquid structures; and
- b. not to exceed 200 bps of plan value per investment for liquid structures.

The Commission's full Investment Authority Delegation Policy is set out in Section VI.

5. Policies and Procedures to Adapt Portfolio to Market Contingencies - State law requires that the AIP include policies and procedures providing flexibility in responding to market contingencies. The ranges included with the Commission's asset and sub-asset class allocation ranges established in Section III provide the CIO with extensive flexibility to adapt the portfolio to market conditions. Similarly, the Commission's Investment Authority Delegation Policy provides the CIO the ability to adapt the Portfolio to changes in market conditions. To the extent that the CIO deems the scope of the authority delegated to the CIO insufficient, the CIO with the approval of the CEO may take action deemed necessary to protect the Portfolio in an extreme market environment. The CIO will promptly inform the Commission of any such actions.

6. Portfolio Rebalancing - The Commission delegates to the CIO or his designee the authority to execute manager and/or securities transactions to implement rebalancing, manage liquidity, or to otherwise manage exposures within the allowable ranges. As part of this delegation, the Commission expects the CIO to articulate, implement and provide reporting to the Commission regarding the Portfolio's rebalancing and exposure management activities as requested. A high-level summary of the rebalancing and exposure management guidelines include:

- i. Portfolio exposure is reviewed on an ongoing (weekly and monthly) basis by Staff and the CIO to ensure that the Portfolio is within its allocation ranges and to identify appropriate actions necessary to maintain compliance and to provide for the Plan's liquidity needs.
- ii. The goal of the rebalancing and exposure management activities is to implement the investment strategy at a reasonable cost within the targets and ranges established by the Commission, recognizing that constant rebalancing to the exact target may not be economically justifiable. The following guidelines are used:
  - a. Rebalancing is currently performed quarterly unless a case has been made not to rebalance. Potential rebalancing activity is flagged for consideration based upon exposure reporting that is updated by RSIC's performance reporting staff. Rebalancing the portfolio incurs costs (trading commissions, bid-ask spread, and market impact) which are taken into consideration when rebalancing the Portfolio;
  - b. When an asset class reaches its minimum or maximum allocation, Staff will initiate rebalancing transactions to keep allocations within the approved ranges. Otherwise, Staff must seek Commission approval to remain outside the range; and
  - c. Concentration risk with respect to significant reliance on any single external manager is reviewed regularly by Staff. Mitigation of performance, operational, headline/ reputational, or other fiduciary risks is typically achieved by maintaining a diversified allocation approach both within and across asset classes.
- iii. RSIC Staff must balance the risks noted above with the economic benefits associated with a streamlined approach that uses fewer, larger allocations. Additional analyses of the costs

and benefits of passive vs. active market exposure are an important input in these decisions.

#### **D. INVESTMENT MANAGER GUIDELINES**

1. General - In keeping with the responsibilities assigned to the CIO by State law and the Commission's Governance Policies, the Commission authorizes the CIO and his designees to develop and revise investment management guidelines for each internally and externally managed investment manager. In making this delegation, the Commission acknowledges that discretion in implementing the investment strategy, within the parameters of all applicable guidelines, will typically be granted to the Commission's investment managers. This discretion is usually limited to the selection of securities and the timing of transactions within the portion of the Portfolio allocated to each manager.
2. Funds of One - A Fund of One is an investment structure in which there is typically a majority investor in a specific vehicle or fund. The Commission or CIO as applicable may elect to use a Fund of One structure when the structure will have lower costs, customized exposure advantages, and/or other beneficial considerations. The CIO is responsible for the day-to-day investment responsibilities with respect to Funds of One, including providing affirmative or negative consent for underlying investments, as required.
3. Pooled or Commingled Funds
  - i. Commingled investment vehicles can often provide lower costs and better diversification than can be obtained with a separately managed account pursuing the same investment objectives.
  - ii. The Commission or CIO, as applicable, may structure a portfolio as a separate account that allows for the advantages of commingled vehicles, but with RSIC as the only investor. With international assets, commingled vehicles save the Commission from having to provide additional resources for currency and foreign custody issues as the manager will assume responsibility for these functions.
  - iii. If an investment mandate is structured through a commingled vehicle, the investment policies of that vehicle will be the legal governing policies of the investment of assets allocated to that vehicle.
4. Strategic Partnerships - The Commission may elect to establish Strategic Partnerships with certain asset managers who are believed to possess specific expertise, knowledge, and capabilities for a limited or broad range of investment strategies. The performance of each Strategic Partnership will be reviewed by the Commission periodically, with a more comprehensive review occurring approximately every 3 to 5 years. The investment approval and evaluation process within the Strategic Partnership is similar to that followed for other investments, however, in addition to passing RSIC's internal process, the investment must also be approved by the investment committee of the strategic partnership.
5. Trade Execution - For all accounts, RSIC expects the purchase and sale of its securities to be conducted in a manner designed to receive the best combination of price and execution. RSIC may evaluate policies that provide for the most efficient and effective trading process. The compliance with investment guidelines must be monitored by the investment managers on an ongoing basis and be based on then-current market values. Securities that, if purchased, would constitute a compliance violation may not be purchased. In the event of a compliance violation, the manager will be expected to promptly notify investment staff. If for some reason the manager does not believe that it is prudent to immediately bring

the account back into compliance, the manager will be expected to present a justification as well as a proposal for bringing the account composition back into compliance.

#### **E. COMPLIANCE WITH SECTION 9-16-320 OF SOUTH CAROLINA CODE**

1. S.C. Code Section 9-16-320 requires the Commission to meet at least once each fiscal quarter for the purpose of reviewing the performance of investments, assessing compliance with the annual investment plan, and determining whether to amend the plan.

2. The Commission has adopted a strategic calendar that sets a meeting schedule of five meetings per year with at least one meeting every fiscal quarter. The strategic calendar also contains standing agenda items for each meeting to ensure compliance with this Section to include:

- i. Quarterly Investment Performance Review – At each meeting the Commission receives a report and presentation on the quarterly, fiscal year to date, one, five, and ten-year plan investment performance. The quarterly performance reports and presentations are based on the Portfolio Performance Reporting Framework described in Section III and are designed to provide the Commission with the ability to judge the absolute value of performance as well as the relative performance between the benchmark portfolios and actual portfolio’s performance. The Commission also receives risk reports to judge the absolute and relative risk of the of these portfolios.
- ii. AIP Compliance Review – At each meeting the Commission receives reports detailing compliance with the Annual Investment Plan to include:
  - a. A review of the asset class exposures and sub-asset class components of the portfolio to ensure compliance with the allowable ranges contained in Section III, Table 8, and to ensure adequate diversification of the portfolio and that the portfolio is not concentrated in any one industry sector, market sector, or issuer;
  - b. A review of relevant progress towards any of the Strategic Initiatives in Section IV;
  - c. Any significant market contingencies and review of any responsive action that resulted in a decision not to rebalance the portfolio pursuant to Section V.C.6 or any action taken to protect the Portfolio which fell outside the allowable ranges in Section III, Table 8;
  - d. Action resulting in significant cost savings to the Portfolio;
  - e. Any material deviation from the general operational and investment policies, and
  - f. As part of an in-depth review of one of the Policy Portfolio asset classes at each meeting, a review of the asset class baseline and progress towards meeting the baseline.
- iii. The Commission retains the authority to amend any portion of the AIP requirements at any meeting and is required to consider amendments proposed by the CIO at its April meeting. However, if the Commission does not act to amend the AIP at any other meeting, it should be presumed that it determined not to amend the plan.

#### **F. GENERAL PROVISIONS RELATED TO ALTERNATIVE INVESTMENTS**

1. South Carolina law, the Employee Retirement Income Security Act of 1974 (“ERISA”), and the Uniform Management of Public Employee Retirement Systems Act of 1997 (“UMPERSA”) each have similar

or compatible, but not identical, definitions and responsibilities of fiduciaries with respect to managing and investing assets of retirement systems. For clarity and consistency, it is prudent for the Commission to declare standards for interpretation of certain terms used in these sources.

2. As relating to the use of alternative investment strategies, the “Plan Assets” of the Retirement System include the System’s ownership interest in the following entities (e.g., a share or a unit), but do not include the underlying assets owned by the entity itself:

- i. a registered investment company;
- ii. a registered security that is widely held and freely transferable;
- iii. an entity in which “benefit plan investors” hold less than 25 percent of the equity interest as defined and determined by ERISA §3(42);
- iv. an “operating company” engaged in the production or sale of a product or service other than the investment of capital;
- v. a “real estate operating company” or REOC (which actively manages and develops real estate consistent with U.S. Department of Labor ERISA regulations);
- vi. a “venture capital operating company” or VCOC (which actively manages “venture capital investments” consistent with U.S. Department of Labor ERISA regulations); or
- vii. a private investment partnership or offshore investment corporation the offering memorandum of which allows for the entity to take both long and short positions, use leverage and derivatives, and invest in many markets.

3. Whenever RSIC invests in an entity that does not hold Retirement System’s assets, the decision to invest in the entity will be subject, inter alia, to the South Carolina fiduciary rules and ethics standards provided by state law, but the transactions engaged in by the entity generally will not be subject to the same rules.

4. RSIC will at times need to interpret statutes while implementing and administering the investment program. Whenever the South Carolina statutes are substantively similar to provisions of ERISA or UMPERSA, and to the extent practicable and consistent with South Carolina law and other principles of general application relating to public pension plans, RSIC intends to use (1) pertinent provisions of ERISA; (2) interpretive rules and regulations of the U.S. Department of Labor relating to ERISA; and (3) the Reporter’s official comments to UMPERSA for guidance.

## VI. INVESTMENT AUTHORITY DELEGATION POLICY

A. (1) Pursuant to Section 9-16-330(B) of the 1976 Code, the Commission delegates to the CIO the final authority to invest subject to the oversight of the CEO and the requirements and limitations of this policy. The size of any one investment made pursuant to this policy is limited to the percentage of total plan assets that applies to the particular asset class to which the investment pertains as provided in Section C of this policy and subject to any other limitation the Commission may place on this authority at any given time. The value of total plan assets to which the percentage limitations apply must be the estimated total value of plan assets included in the most recent quarterly investment performance report prepared pursuant to Section 9-16-90(A) of the 1976 Code. Individual investments made in a separately managed account or a fund of one structure are not considered separate investments for purposes of this policy and are subject in aggregate to the limitations and requirements of this policy regardless of whether some degree of discretion is retained by staff regarding individual investments to be included in the applicable account.

B. The investment process for any investment made pursuant to this policy must adhere to RSIC's Due Diligence Guidelines and Policies. Notwithstanding the authority granted by this policy, an investment must be presented to the Commission for its approval if it meets any of the following criteria:

1. An investment into an asset class other than (i) an asset class or sub-asset class provided in Table 8, Section III of the Consolidated AIP/SIOP or (ii) Portable Alpha Hedge Funds;
2. The majority of the types of assets contemplated to underlie the investment have not been previously included in the investment portfolio;
3. The strategy to be employed by the investment manager is not substantially similar to an investment that has been previously subject to RSIC's investment due diligence process; or
4. The investment strategy, other than in publicly traded assets, has important direct connections to South Carolina residents, state policymakers, or South Carolina focused businesses, and/or a majority of the assets of the investments would be principally located in South Carolina.

C. The size of an individual investment made pursuant this policy is subject to the following limitations provided for the asset class applicable to the investment:

1. Public Markets - 2% of the total value of plan assets, unless it is reasonable to believe that due to the particulars of the investment strategy that liquidating the investment would ordinarily require longer than ninety days and, in such case, the limit is 1% of the total value of plan assets, for:
  - i. Global Public Equity:
    - a. Domestic,
    - b. Developed Non-US,
    - c. Emerging Market.
  - ii. Bonds:
    - a. Core Bonds (IG),
    - b. Inflation-linked (IG),
    - c. Mixed Credit,
    - d. Non-IG,

- e. EM Debt,
    - f. Non-index (IG),
    - g. Net Cash and Short Duration, and
  - iii. Portable Alpha Hedge Funds.
- 2. Publicly-Traded Real Estate - 1% of the total value of plan assets.
- 3. Private Markets - 1% of the total value of plan assets for:
  - i. Private Equity,
  - ii. Private Debt,
  - iii. Private Real Assets,
    - a. Real Estate, and
    - b. Infrastructure.

D. Pursuant to Section 9-16-330(B)(2), the closing documentation of any investment made pursuant to this policy must include the CEO's certification that the investment conforms to the amount and extent of delegation provided by this policy.

E. The Commission must be informed of an investment made pursuant to this policy no later than three business days following the closing of the investment. The notification must include an executive summary of the investment and provide access to any of the following documents relied upon by staff when making the investment:

- 1. the investment due diligence report,
- 2. the operational due diligence report,
- 3. any memorandum and/or reports from the general or specialty consultant,
- 4. the Internal Investment Committee action summary,
- 5. the completeness check certification, and
- 6. the final versions of pertinent legal documents, including the Investment contract, limited partnership agreement, the investment management agreement, as applicable, and/or other closing documents.

F. An investment made pursuant to this policy must be reviewed with the Commission at the next regularly scheduled Commission meeting. The Commission must be notified if the aggregate amount of all delegated investments subject to the reporting requirements of Section E made between regularly scheduled Commission meetings exceeds 5% of Plan assets and the notification must also provide an estimate of the total percentage amount of any additional investments above the 5% threshold likely to be made prior to the next meeting.

G. Passively Managed Strategies (Public Markets) - The Commission believes that the use of indexed strategies in Public Equity and Bonds has been, and continues to be, an important tool of portfolio management. For Public Equity and Bonds, a decision to add or reduce indexed benchmark exposure is considered an implementation decision, rather than an investment decision, and is not subject to the limitations set forth in subsection C.1, and is rather subject to the asset class ranges provided in Section III, Table 8.

H. Co-investments provide RSIC the opportunity to invest alongside a fund or structure's individual investments at favorable fee terms. These favorable fee terms allow RSIC to enhance an investment's return by the amount of savings compared to the fee terms of the fund or structure. In many instances, RSIC is already committed to the applicable fund or structure, and co-investments allow RSIC to lower

blended costs which benefits the fund or structure's return. In order to reduce idiosyncratic risk, co-investments must be sized in a way that creates a diversified portfolio of co-investments and avoids concentration in any one investment. Co-investments require a greater speed of execution than regular fund investments, so RSIC must maintain a co-investment process that ensures opportunities are evaluated in a timely manner while also providing a commensurate degree of due diligence. Given the need for timely execution and the often-sensitive nature of co-investment opportunities, co-investments of 10 basis points or less of Plan assets are not subject to the reporting requirements of Section E. In order to ensure proper oversight, the Commission must be provided with a report during each meeting's Executive Session of all co-investments made since the last meeting.

I. The CIO must provide the Commission with an updated proposed investment pipeline on a quarterly basis.

J. The delegation of the final authority to invest pursuant to this section includes the authority to terminate an investment manager as described in Section V.C.iii. The CIO must approve any termination of a manager made pursuant to this policy, subject to the oversight of the CEO. The CIO must provide a memorandum to the Commission summarizing his justification for terminating the manager within three days of terminating the manager. The CIO must provide a review of the termination to the Commission at the next Commission meeting.

K. The Commission will review this policy annually to ensure that it remains relevant and appropriate, or when there has been an amendment to state law relevant to any section of this policy, or a Commission approved change in the responsibilities, duties or operations of the Commission or its Committee generally, or as otherwise deemed appropriate by the Commission.

L. No provision of this policy shall apply to the extent that it is in conflict with any provision of the Code of Laws of South Carolina, 1976, as amended. In the event of such conflict, the applicable Code provision shall apply in all respects.

M. This policy was adopted by the Commission on September 28, 2017, subject to final approval by the Chair of the incorporation of certain amendments into the policy. The Chair issued final approval of the policy on October 23, 2017.

N. This policy was amended on December 2, 2021, and took effect on December 2, 2021.

O. This policy was further amended on April 18, 2024, and took effect on July 1, 2024.

P. This policy was last amended on June 5, 2025, and took effect on June 5, 2025.

Q. This policy was further amended on April 16, 2026 and took effect July 1, 2026.

## VII. SECURITIES LITIGATION POLICY (“POLICY”)

### A. PURPOSE AND GENERAL PRINCIPLES

- a. The purpose of this Policy is to set forth the South Carolina Retirement System Investment Commission’s<sup>1</sup> guidelines with respect to securities litigation. Interests in securities litigation matters will be managed as assets of the South Carolina Retirement Systems Group Trust (the “Trust”) with the goal of enhancing the long-term value of the Trust.
- b. The Commission acknowledges that it has a fiduciary duty to take reasonable actions to pursue and collect on legal claims held as an asset of the Trust. The Commission also recognizes that most, if not all, of the securities litigation claims in which the Trust may have an interest will be pursued by law firms from the class action bar regardless of whether RSIC takes an active role in the litigation.
- c. This Policy outlines the Commission’s procedures for monitoring the Trust’s portfolio for potentially actionable losses, protecting the Trust’s interests in litigation related to portfolio losses, and maximizing recoveries attainable by the Trust from such actionable losses.
- d. This policy consists of four sections: 1) a section relating to asset recovery as passive class members in U.S.-based securities actions; 2) a section for litigation of securities listed on domestic exchanges where RSIC deems active participation is warranted; 3) a section for litigation of securities listed on foreign exchanges; and 4) a section related to the monitoring process for both foreign and domestic claims in which the Trust takes an active role.

### B. PART ONE: SECURITIES LITIGATION POLICY FOR FILING PROOFS OF CLAIM (“PASSIVE PARTICIPATION”)

- a. Under U.S. federal law, securities class action lawsuits function as “opt-out” cases. This means that the Trust does not need to participate as a named party in order to recover its pro rata share of a class action recovery so long as the certified class claims include the losses incurred by the Trust. This type of participation is called Passive Participation. When notified of a class action settlement in which the Trust has suffered a loss, RSIC need only submit a timely and valid proof of claim in order to be included in any recovery.
- b. The Trust’s custodial bank, The Bank of New York Mellon (“BNY”), is responsible for completing and filing all proofs of claim, including the necessary supporting documents and information in every securities class action pending in the U.S. in which the Trust has a direct interest (i.e., for Trust assets that are custodied at BNY (“In- Bank Assets”)). BNY is not responsible for filing proofs of claim for, or otherwise reporting on the management of, securities class action litigation for assets that are not custodied at BNY (“Out-of-Bank Assets”).
- c. BNY’s claims filing responsibilities are set forth in more detail in the Service Level Description, dated July 21, 2019, between the Trust by and through RSIC and BNY (the “SLD”). The SLD outlines

---

<sup>1</sup> “Commission” refers to the commission of eight members responsible for managing the South Carolina Retirement System Investment Commission, as specified in S.C. Code of Laws Ann. Section 9-16-315.

“South Carolina Retirement System Investment Commission” or “RSIC” refers to the agency established by South Carolina law for the purpose of investing and managing all assets held in trust for the participants and beneficiaries of the state’s five separate defined benefit plans.

the process for: (i) identifying and reviewing all class action recoveries (whether by settlement or trial); (ii) providing timely notice of each settlement recovery to RSIC and the Commission; (iii) filing complete and accurate proofs of claim forms in a timely fashion on behalf of the Trust; (iv) providing quarterly reports outlining all claims filed on behalf of the Trust during the quarter; and (v) providing quarterly reports identifying all securities litigation proceeds recovered by the Trust directly or on its behalf. In the event of a claim involving securities that are not identified by a specific security identifier (e.g., CUSIP, ISIN, SEDOL, etc.), BNY will use commercially reasonable efforts to identify impacted securities recorded in BNY's records relating to the security named in the documentation received. In the event that BNY is unable to file a claim on the Trust's behalf (e.g., involving anti-trust claims), BNY, or in some cases a third party, will forward the relevant claim information to RSIC, and RSIC will utilize the services of third-party claims filing services that specialize in analyzing and filing such claims.

### **C. PART TWO: SECURITIES LITIGATION POLICY FOR SECURITIES LISTED ON A DOMESTIC EXCHANGE**

- a. While the Commission has a fiduciary obligation to take reasonable action to collect on legal claims held by the Trust, the Trust, acting by RSIC, may need to engage in active participation ("Active Participation") on occasion. This type of participation involves serving as lead plaintiff in cases in the domestic exchange context. Active Participation in domestic securities class actions must be balanced with the Commission and RSIC's primary obligation to maximize the investment returns of the Trust. This determination must also be weighed against the additional costs and burden on staff that may result by becoming lead plaintiff in a securities litigation case as well as the recognition that the Trust's position as a lead plaintiff will not, in and of itself, entitle the Trust to any greater recovery.
- b. Authority to Seek Lead Plaintiff Designation: Due to the time-sensitive nature of electing to seek a lead plaintiff designation and the Chief Executive Officer's ("CEO") statutory designation as the chief administrative officer of RSIC, the Commission, through this Policy, has delegated to the Executive Leadership Team the authority to elect to seek a lead plaintiff designation where appropriate, reasonable, and prudent to protect the interests of the Trust.
- c. Decision-Making Guidance for Active Participation: The Executive Leadership Team will generally consider seeking lead plaintiff status ("Active Participation") in a domestic class action when: (i) the Trust's projected losses exceed \$5 million U.S. Dollars (the "Loss Threshold"); or (ii) when the loss is substantial but less than the Loss Threshold and there are significant special factors justifying the Trust's involvement. The determination of special factors will be made in the discretion of the Executive Leadership Team.
- d. Monitoring Procedures: In addition to the reporting provided by BNY for class action litigation involving In-Bank Assets, the Trust may retain three or more securities litigation monitoring law firms (the "Firms") to advise RSIC via periodic reporting of recently-filed class actions in which the Trust has sustained losses and which appear to have merit. The Firms will generally be engaged for up to five years, with the option to terminate earlier or renew for additional periods. Each of the Firms will provide reporting on at least a quarterly basis outlining all recently filed claims in which the Trust has sustained losses. Additionally, the Firms will submit written memos to RSIC on certain cases, including any cases exceeding the Loss Threshold, regarding the alleged facts of the case, the estimated losses, the Firm's view on the merits of the allegations, and a recommendation as to whether RSIC should seek a lead plaintiff position in the matter. RSIC Legal will perform an initial review of all reports and memos received from the Firms. Any reports or memos indicating

a loss that exceeds the Loss Threshold will be forwarded to the CLO for further review. The CLO will review the reports and will follow up with the Firms that have provided the memorandum to get additional insight and information about potential claims exceeding the Loss Threshold (“Reviewable Claims”) and will make additional inquiries or conduct additional research as needed.

- e. After review by the CLO, the CLO will confer with the Executive Leadership Team regarding the merits of Reviewable Claims, including the projected losses incurred by the Trust, the specifics of the related investment(s), available staff resources, and the recommendations of the Firms regarding whether the Trust should seek a lead plaintiff position. Any decision to seek a lead plaintiff designation for a claim exceeding the Loss Threshold or based on special circumstances must be made by a unanimous vote of the Executive Leadership Team. The Executive Leadership Team will notify the Chair and Vice-Chair of the Commission about any decision to seek a lead plaintiff position and will update the Commission via reporting to the Commission’s secure portal.
- f. Selection of Outside Counsel for Securities Litigation If the Executive Leadership Team determines that it is prudent to hire one of the Firms or other legal counsel to represent the Trust in a securities litigation action to protect the assets of the Trust, all selection of counsel and retainer agreements shall be negotiated, executed, and monitored by the CEO with assistance from the CLO. The CEO may engage one of the Firms hired to monitor the Trust’s portfolio, or the CEO may seek to engage other counsel after consultation with the CLO and notice and consultation with the Office of the South Carolina Attorney General, as required by S.C. Code Ann. Section 9-16-315(I). When RSIC first engages the Firms, RSIC will pre-negotiate a proposed engagement agreement for potential litigation, which must be approved by the CEO.

#### **D. PART THREE: SECURITIES LITIGATION FOR SECURITIES LISTED ON A FOREIGN EXCHANGE**

- a. Due to the 2010 Supreme Court case, *Morrison v. National Australia Bank Ltd.*,<sup>2</sup> investors no longer have the protections of U.S. securities laws for securities that were purchased on a non-U.S. exchange. Unlike the U.S. class action process, foreign securities actions generally require investors to join as a named-plaintiff or “opt-in” at the commencement of the case in order to be entitled to a share of any recovery. This “opt-in” process requires affirmative decisions early in the process to join the lawsuit in order to participate in any recovery. In many cases, investors may be required to make these decisions before a foreign action is even filed.
- b. Decision-Making Guidance for Active Management: Because there is rarely an option for passive participation in foreign securities actions, the review for participation in these actions differs from those explained in Part Two of this Policy. The CLO will review notices of potential claims in foreign securities actions and will review recommendation memos received from the Firms or other sources in those cases where the loss threshold exceeds \$1 million (the “Foreign Loss Threshold”). In foreign jurisdictions, various groups, including non-law firm litigation funding organizations, may act as a funding source for the litigation and work with a certain legal team to initiate litigation. In some cases, the group that first files a lawsuit may become a founding group (“Founding Group”). Founding Groups may impose differing terms and conditions in order to participate in a lawsuit. The CLO will review all available factors relating to participating in foreign actions for claims exceeding the Foreign Loss Threshold, including but not limited to: (i) the amount of the loss; (ii) the potential litigation fees; (iii) the litigation funding requirements; (iv)

---

<sup>2</sup> *Morrison v. National Australia Bank Ltd.*, 561 U.S. 247 (2010).

whether more than one litigation funding group is proposing participation; (v) the risk of adverse costs; (vi) the legal merits of the case; (vii) the contractual requirements for joining and/or bringing a claim; and (viii) the potential cost of staff's time. After reviewing the above factors and the documentation required to elect to participate in the applicable foreign jurisdiction, the CLO will make a recommendation to the CEO on whether to participate, and if applicable, which Founding Group to elect based on the most suitable contract terms available for the Trust. The CEO, after reviewing the CLO's recommendation, will elect (A) whether or not to pursue participation in foreign litigation that exceeds the Foreign Loss Threshold; and (B) which funding group to select based on the terms and legal requirements of each. The CLO, working with the Firm(s), as applicable, will negotiate the required documentation and retain the right to change a recommendation to participate if suitable contract terms cannot be negotiated with the Founding Group.

**E. PART FOUR: LITIGATION MONITORING FOR ACTIVE PARTICIPATION IN DOMESTIC AND FOREIGN LITIGATION**

- a. The CEO, acting via the CLO, will monitor any pending domestic or foreign cases in which RSIC is actively participating. The CLO will request quarterly written status updates from any Firms representing RSIC in Active Participation cases. The CLO will actively participate in discussions with the Firms regarding any participation by RSIC Staff or document production needs. The CEO and CLO will be actively involved in settlement discussions for any domestic litigation action. The CLO will submit periodic updates to the CEO and the Commission regarding such cases. In accordance with the CEO's statutory authority as chief administrative officer of the Commission, the CEO retains the ultimate authority related to the direction of any class action litigation and/or settlement pursuant to this Policy. The CEO may consult the Commission on any matter related to the initiation of or conduct of any lawsuit pursuant to this Policy. The CEO shall have full authority to approve a proposed settlement of any litigation. In addition, the CEO shall have full authority to execute all contracts, legal documents, settlements, certifications, and authorizations required to pursue litigation authorized by the Executive Leadership Team.

**F. THE COMMISSION SHALL REVIEW THIS POLICY AT LEAST ONCE EVERY THREE (3) YEARS TO ENSURE THAT IT REMAINS RELEVANT AND APPROPRIATE.**

## VIII. PLACEMENT AGENT POLICY

### A. PURPOSE

It is the intent of this Policy to comply with S.C. Code Ann. §9-16-100, which prohibits compensation being paid to a Placement Agent (as defined below) as a result of an investment by the Retirement System (as defined below).

### B. DEFINITIONS

For purposes of this Policy, the following capitalized terms will have the defined meaning set forth below:

- a. Pursuant to §9-16-100(B), a “Placement Agent” means any individual directly or indirectly hired, engaged, or retained by, or serving for the benefit of or on behalf of an external manager or an investment fund managed by an external manager and who acts or has acted for compensation as a finder, solicitor, marketer, consultant, broker, or other intermediary in connection with making an investment with or investing in a fund managed by the external investment manager.
- b. “Placement Agent Policy Compliance Letter” means that letter which will be requested from prospective external investment management firms in accordance with the terms of this Policy.
- c. “Policy” means this Placement Agent Policy.
- d. “Retirement System” means the South Carolina Retirement Systems Group Trust.
- e. “RSIC” means the South Carolina Retirement System Investment Commission.

### C. PROCEDURE

- a. RSIC staff will inform prospective external investment management firms (“Investment Managers”) as to the RSIC’s Placement Agency Policy and statutory requirements as soon as practicable after RSIC staff begins the due diligence review of any potential investment. The RSIC staff member leading the due diligence review for the investment is responsible for sending written notice (paper, fax or email) to the Investment Manager requesting a Placement Agent Policy Compliance Letter. If a copy of this Policy has not already been provided to the Investment Manager, then this Policy will be made available to the Investment Manager prior to or at the time notice is given to the Investment Manager.
- b. The Placement Agent Policy Compliance Letter must be included in the RSIC investment Due Diligence Report packet.
- c. Investments will not be voted on by the Commission, Internal Investment Committee, or otherwise approved pursuant to RSIC policies, prior to receipt of the completed Placement Agent Policy Compliance Letter and confirmation from RSIC compliance staff that the letter is sufficient per Section G below.
- d. The following entities must complete the Placement Agent Policy Compliance Letter as outlined below:
  - i. Investment Managers that have a direct contractual investment management relationship with the RSIC or with an investment vehicle in which the RSIC is invested.
  - ii. Investment Managers that have an indirect contractual investment management relationship with the RSIC through an investment vehicle that invests in funds or other pooled investment vehicles or other assets.

#### **D. PLACEMENT AGENT POLICY COMPLIANCE LETTER**

The Investment Manager will provide disclosures in the form of a letter addressing all requirements specified below:

- a. Certification that, in compliance with §9-16-100, no Placement Agent (as defined by State law) received, or will receive, compensation in connection with the RSIC making an investment with or investing in a fund managed by the Investment Manager.
- b. Representation that the Investment Manager has reviewed the applicable law and has not relied on the counsel or advice of RSIC or any employee, representative, agent or officer of RSIC regarding the interpretation and application of the applicable law.
- c. Representation that all information contained in the Placement Agent Policy Compliance Letter is true, correct, and complete in all material respects.

#### **E. OPEN RECORDS LAW**

RSIC may be required to disclose information in the Placement Agent Policy Compliance Letter under the South Carolina Freedom of Information Act.

#### **F. INVESTMENTS WITH SEPARATE ACCOUNT INVESTMENT MANAGEMENT AGREEMENTS (“IMAs”)**

If, after closing, the RSIC determines that the Placement Agent Policy Compliance Letter contains a material inaccuracy or omission, the RSIC will, to the fullest extent possible, seek the option, in its sole discretion and without liability to the Investment Manager or any third party, to terminate the IMA and to pursue all remedies that may otherwise be available to the RSIC without incurring any penalty under any agreement to which it is a party.

#### **G. INVESTMENTS IN COMMINGLED INVESTMENT STRUCTURES (LPAs, LLCs, TRUSTS, ETC.)**

The RSIC will endeavor to have provisions incorporated into the transaction documents for commingled investment structures which would permit the RSIC to take those actions described in the next sentence. If, after closing, the RSIC determines that the Placement Agent Policy Compliance Letter contains a material inaccuracy or omission, the RSIC will seek to obtain the option, in its sole discretion and without liability to the commingled investment structure, the General Partner or equivalent management entity, any other investor in the structure or third party, to cease making further capital contributions and/or direct payments to the investment and to pursue all remedies that may otherwise be available to the RSIC without being deemed to be a defaulting Limited Partner under the transaction documents and without incurring any other penalty under any agreement to which it is a party.

#### **H. REVIEW**

RSIC’s compliance staff will review Placement Agent Policy Compliance Letters and will determine whether each letter is sufficient. Any questions regarding the sufficiency of the letter will be referred to the RSIC legal department and will be reported to the CIO and applicable RSIC Staff.

#### **I. STAFF CONTACT**

RSIC staff will provide notice about the prohibition in the state law to any party that contacts RSIC staff regarding a potential investment and appears to be acting in the role of a Placement Agent.

**J. OBLIGATION TO UPDATE**

It is the Investment Manager's obligation to promptly inform RSIC staff of any material changes to a prior-filed Placement Agent Policy Compliance Letter, and to submit an updated Placement Agent Policy Compliance Letter where warranted prior to the RSIC's closing on an investment.

**K. REVIEW AND HISTORY**

- a. The Commission will review this policy at least every three years to ensure that it remains relevant and appropriate, or when there has been an amendment to state law relevant to any section of this policy, or a Commission approved change in the responsibilities, duties, or operations of the Commission or its committees generally, or as otherwise deemed appropriate by the Commission.
- b. No provision of this policy shall apply to the extent that it is in conflict with any provision of the Code of Laws of South Carolina, 1976, as amended. In the event of such conflict, the applicable Code provision shall apply in all respects.
- c. This policy was initially adopted on September 20, 2012.
- d. This policy was amended on June 22, 2017 and will take effect on July 1, 2017.

## IX. SUDAN DIVESTMENT POLICY

A. Background. The State of South Carolina has enacted a Sudan divestment law, codified at S.C. Code Ann. §9-16-55 (“Act”). The uncodified preamble to the Act notes that “[d]ivestment is a course of last resort that should be used sparingly and under extraordinary circumstances,” but states that “the genocide occurring in the Sudan is reprehensible and abhorrent,” warranting this type of legislative response. The Act, which applies solely to the South Carolina Retirement Systems Group Trust (“Group Trust”) managed by the South Carolina Retirement System Investment Commission (“Commission” as the governing body, “RSIC” as the agency), sets forth various criteria that are to be considered by the Commission in making the determinations required by the Act.

B. Purpose. The purpose of this Sudan Divestment Policy (“Policy”) is to document the manner in which the Act is administered. The Commission has the exclusive authority to invest and manage the assets of the Group Trust pursuant to S.C. Code Ann. §9-16-20. The Commission also has the fiduciary duty to manage the assets of the Group Trust solely in the interests of the retirement systems, participants, and beneficiaries. The Commission must discharge these responsibilities in a manner consistent with all applicable statutes, regulations, and policies, including the Act.

C. Definitions. The Act utilizes the following defined terms:

- a. “Active Business Operations” means a Company engaged in Business Operations that provide revenue to the Government of Sudan or a Company engaged in Oil-Related Activities.
- b. “Business Operations” means maintaining, selling, or leasing equipment, facilities, personnel, or any other apparatus of business or commerce in Sudan, including the ownership or possession of real or personal property located in Sudan.
- c. “Company” means a sole proprietorship, organization, association, corporation, partnership, venture, or other entity, its subsidiary or affiliate that exists for profit-making purposes or to otherwise secure economic advantage. “Company” also means a Company owned or controlled, either directly or indirectly, by the Government of Sudan, that is established or organized under the laws of or has its principal place of business in the Sudan.
- d. “Government of Sudan” means the Government of Sudan or its instrumentalities as further defined in the Darfur Peace and Accountability Act of 2006.
- e. “Investment” means the purchase, ownership, or control of stock of a Company, association, or corporation, the capital stock of a mutual water Company or corporation, bonds issued by the government or a political subdivision of Sudan, corporate bonds, or other debt instruments issued by a Company.
- f. “Military Equipment” means weapons, arms, or military defense supplies.
- g. “Oil-Related Activities” means, but is not limited to, the export of oil, extracting or producing oil, exploration for oil, or the construction or maintenance of a pipeline, refinery, or other oil field infrastructure.
- h. “Public Employee Retirement Funds” means those assets as defined in §9-16-10(1).
- i. “Scrutinized Companies” means any of the following:
  - i. The Company is engaged in Active Business Operations in Sudan; and
  - iii. The Company is engaged in Oil-Related Activities or energy or power-related operations, or contracts with another Company with Business Operations in the

oil, energy, and power sectors of Sudan, and the Company has failed to take Substantial Action related to the Government of Sudan because of the Darfur genocide; or

- iv. The Company has demonstrated complicity in the Darfur genocide.
- v. The Company is not engaged in Oil-Related Activities and lacks significant Business Operations in the eastern, southern, and western regions of Sudan; and
- vi. The Company is engaged in Oil-Related Activities or energy or power-related operations, or contracts with another Company with Business Operations in the oil, energy, and power sectors of Sudan, and the Company has failed to take Substantial Action related to the Government of Sudan because of the Darfur genocide; or
- vii. The Company has demonstrated complicity in the Darfur genocide.
- viii. The Company supplies Military Equipment within the borders of Sudan.<sup>3</sup>
- j. “State” means the State of South Carolina.
- k. “Substantial Action” means a boycott of the Government of Sudan, curtailing business in Sudan until that time described in Section I of this Policy, selling Company assets, equipment, or real and personal property located in Sudan, or undertaking significant humanitarian efforts in the eastern, southern, or western regions of Sudan.
- l. “Sudan” means the Republic of the Sudan, a territory under the administration or control of the Government of Sudan, including, but not limited to, the Darfur region, or an individual, Company, or public agency located in Khartoum, northern Sudan, or the Nile River Valley that supports the Republic of the Sudan.

D. Identification of Companies

- a. Identifying Scrutinized Companies. RSIC Staff (“Staff”) has engaged the services of a specialized research firm (“Advisor”) to (i) identify companies doing business in Sudan, as defined in the Act, and (ii) provide Staff with a list of such Scrutinized Companies (“Scrutinized Companies List”).
- b. Updates to Scrutinized Companies List. Staff shall ensure that the Scrutinized Companies List is updated on or about January 1 and July 1 of each year.

E. Engagement

- a. Determining Scrutinized Status. For each Company identified by the Advisor pursuant to Section D of this Policy, RSIC (either via Staff or the Advisor) shall send a written notice informing the Company that it may become subject to divestment by RSIC. The notice shall offer the Company the opportunity to clarify its Sudan-related activities within 90 days in order to avoid qualifying for potential divestment.
- b. Compliance. If, following RSIC’s notification (either via Staff or the Advisor) to a Company pursuant to Section E. a. of this Policy, that Company ceases the activities that caused the Company to be added to the Scrutinized Companies List, as determined by the Advisor, the Company shall be removed from the Scrutinized Companies List, and the provisions of this

---

<sup>3</sup> If a Company provides equipment within the borders of Sudan that may be readily used for military purposes, including but not limited to, radar systems and military-grade transport vehicles, there is a strong presumption against investing in the Company unless that Company implements safeguards to prevent the use of that equipment for military purposes.

Section E shall cease to apply to the Company unless it resumes the activities that caused the Company to be added to the Scrutinized Companies List.

- F. Determinations to be made by the Chief Investment Officer
- a. Delegation to the Chief Investment Officer. The Commission has delegated authority to the Chief Investment Officer (“CIO”) to, in consultation with RSIC’s Chief Executive Officer, make the determinations required under the Act and to take actions necessary to implement this Policy.
  - b. General. If, following RSIC’s engagement with a Company pursuant to Section E. a. of this Policy, the Company continues to be a Scrutinized Company, Staff will present the CIO with detailed information gathered from the Advisor, affected investment managers, and others regarding the Company, its Business Operations, the Group Trust’s holdings, and any other information required by the Act and this Policy. The CIO will make determinations as to (i) whether Staff should sell, redeem, divest, or withdraw the Group Trust’s interests in the Company, and (ii) the timing of any such sale, redemption, divestment, or withdrawal. The CIO will also make the determinations described in Section I of this Policy.
- G. Prohibition. RSIC shall not use Public Employee Retirement Funds to acquire new Investments in Companies on the Scrutinized Companies List, except as provided in this Policy.
- H. Permissible Investments under the Act
- a. The Act does not apply to the following types of Investments:
    - i. Investments in a Company that is primarily engaged in supplying goods or services intended to relieve human suffering in Sudan;
    - ii. Investments in a Company that promotes health, education, journalistic, or religious activities in or welfare in the western, eastern, or southern regions of Sudan;
    - iii. Investments in a United States Company that is authorized by the federal government to have Business Operations in Sudan; and
    - iv. Investments that constitute indirect beneficial ownership through index funds, commingled funds, limited partnerships, derivative instruments, or the like.
  - b. In developing the Scrutinized Companies List, the Advisor shall determine, in good faith and with due professional care, whether any of the foregoing exemptions and exclusions set forth in the Act apply.
- I. Determinations required to be made by the CIO pursuant to §9-16-55(D)(1). The Act states that nothing in the Act “requires the [C]ommission to take action as described in [the Act] unless the [C]ommission determines, in good faith, that the action described in [the Act] is consistent with the fiduciary responsibilities of the [C]ommission as described in [Title 9, Chapter 16 of the Code] and there are appropriated funds of the State to absorb the expenses of the [C]ommission to implement this [Act].” §9-16-55(D)(1). Accordingly, whenever the CIO is asked to consider taking action under the terms of the Act or this Policy, Staff will assist the CIO in making the determinations required to be made as described in this Section.

- J. Reporting. Staff shall, following the close of RSIC's fiscal year, prepare a formal report to the Commission regarding actions taken pursuant to the Act. RSIC shall also publish the report. The report shall include all of the following information with respect to the previous fiscal year:
- a. The Scrutinized Companies List;
  - b. A list of all Companies added to or removed from the Scrutinized Companies List;
  - c. A summary of correspondence with Companies engaged by RSIC under the Act;
  - d. A list of all Companies that RSIC will continue to engage concerning their Business Operations in Sudan;
  - e. A summary of all Investments sold, redeemed, divested, or withdrawn under the Act; and
  - f. A list of all Investments that were retained by RSIC pursuant to a determination by the CIO as set forth in Section I.
- K. Expiration. The restrictions in the Act shall apply only until:
- a. The Government of Sudan halts the genocide in Darfur for twelve months as determined by both the Department of State and the Congress of the United States; or
  - b. The United States revokes its current sanctions against Sudan.
- L. Indemnification. The Act provides that present and former board members, officers, and employees of the State Fiscal Accountability Authority, present, future, and former directors, officers, and employees of the South Carolina Public Employee Benefit Authority, the Commission, and contract investment managers retained by the Commission must be indemnified from the general fund of the State and held harmless by the State from all claims, demands, suits, actions, damages, judgments, costs, charges, and expenses, including court costs and attorney's fees, and against all liability, losses, and damages of any nature whatsoever that these present, future, or former board members, officers, employees, or contract investment managers shall or may at any time sustain by reason of any decision to restrict, reduce, or eliminate Investments pursuant to the Act.

**X. LONG-TERM ANNUALIZED RETURN AND VOLATILITY EXPECTATIONS  
(VERUS 2025)**

## XI. ASSET ALLOCATION HISTORY

The following is included in the AIP/SIOP to memorialize the major strategic asset allocation changes the Commission made in 2020 as the result of a one-year review over the course of Fiscal Year 2019-2020. This review yielded two important outcomes: (1) a shift from a complex strategic asset allocation comprised of eighteen asset classes with target weights to a simplified asset allocation comprised of five asset classes with target weights, and (2) instilling a discipline of only conducting a comprehensive strategic asset allocation review once every five years. The Commission believes that it is important to maintain the history of this asset allocation review as part of the AIP/SIOP to preserve the reasoning and lessons learned as part of the Commission's institutional memory.

The Commission undertook a comprehensive strategic asset allocation review of the then-existing Policy Portfolio in early 2019 which led to the Commission adopting a streamlined strategic asset allocation in April 2020. At the time the Commission began the 2019-2020 strategic asset allocation review, the Policy Portfolio was comprised of eighteen separate asset classes with twenty-one different benchmarks. Many of the asset classes had small target weights – several with less than three percent.

Both the CIO and the Investment Consultant expressed concern that the Policy Portfolio was over-diversified and required a high level of complexity to exist in the Actual Portfolio without a clear improvement in risk or return. The Commission found this to be inconsistent with its investment belief that investors must be rewarded for incurring additional risk, cost, and complexity. The Commission also believed that the existing Policy Portfolio established the wrong balance between its role as setting the strategic direction of the investment program and investment staff's role in implementing the portfolio. As a result, the Commission determined that a more consolidated Policy Portfolio was in order which valued simplicity and required complexity in the Actual Portfolio to prove its value. The Commission determined that key to this effort was developing a series of benchmarks that would collectively form a Portfolio Performance Framework to clearly determine the value of investment decisions.

### Reference Portfolio

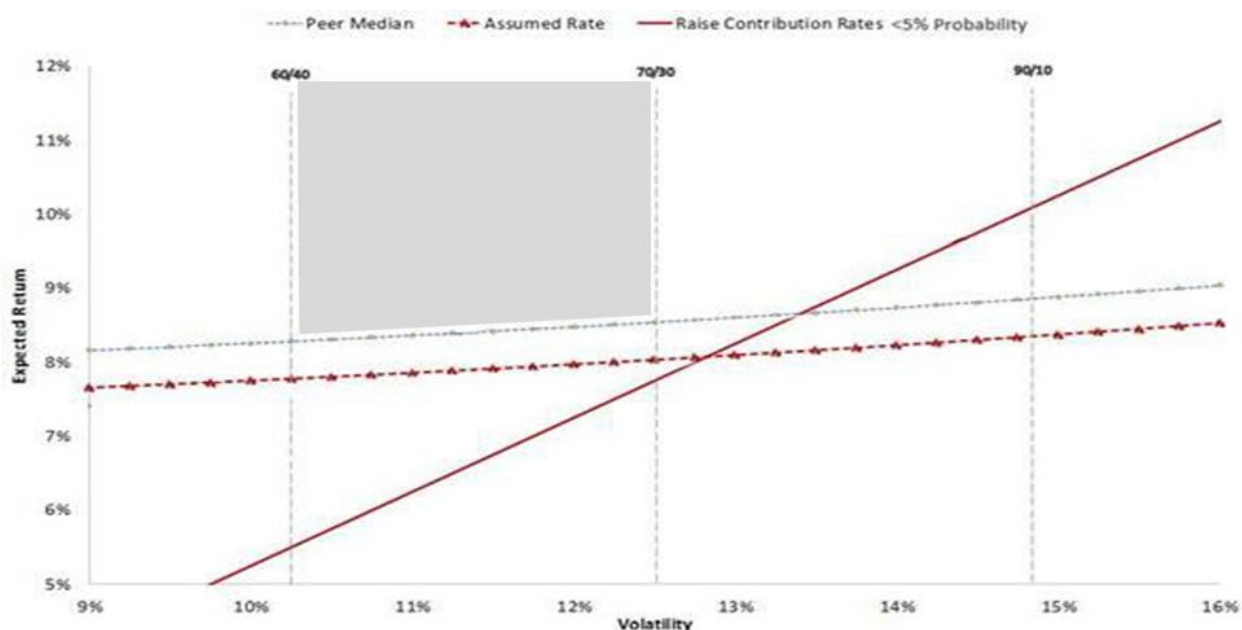
The Commission decided that it would begin the development of this framework by setting a Reference Portfolio. The Reference Portfolio would be a simple two asset class benchmark portfolio comprised of stocks and bonds. The point of the Reference Portfolio was not to limit the portfolio to a simple mix of stocks and bonds, but rather to set a risk reference for establishing the Policy Portfolio. Although the intent was for the Reference Portfolio's risk to represent that of the Policy Portfolio, the Reference Portfolio would not serve as a risk limit for the Policy Portfolio, but rather a barometer to measure the value over time of diversifying into a multi-asset class portfolio.

The Commission attempted to set the allocation of the Reference Portfolio to one consistent with a portfolio that most closely expressed the risk required to earn a return that was expected to exceed the then assumed annual rate of return while also avoiding a greater than 5 percent probability of requiring additional contributions increases in the next ten years (other plan risks were also contemplated but would also be avoided because these risks would either fall along the same line or to the right of the red risk line represented in Table 9 below). In setting the Reference Portfolio, the Commission was mindful that South Carolina law provides that no more than seventy percent of the portfolio may be invested in equities. The law does not limit the types of assets that could make up the other thirty percent of the portfolio, which could conceivably include assets like high yield bonds which have an embedded equity risk factor. However, the Commission believed it was prudent to constrain the Reference Portfolio to no

more than seventy percent equity risk, as expressed by a seventy percent allocation to equities, and to mitigate the equity risk with a thirty percent allocation to bonds.

The Commission considered the appropriate Reference Portfolio at its April and June 2019 meetings. The Commission determined that a 70 percent Global Public Equities (MSCI ACWI IMI Net) and 30 percent Bonds (Bloomberg Barclays Aggregate) portfolio best represented the volatility of a diversified portfolio of assets that would be expected to earn a return that exceeds the assumed annual rate of return over time while also avoiding a greater than 5 percent probability of requiring additional contributions increases in the next ten years. The Commission reached consensus on this allocation as the Reference Portfolio Benchmark. In reaching this consensus, the Commission accepted that a Reference Portfolio with a risk level associated with a seventy percent allocation to equities was prudently necessary to meet its investment objective.

*Table 9 - Reference Chart for the Allocation Portfolio*



### Policy Portfolio

After reaching consensus on the Reference Portfolio in June 2019, the Commission then began establishing a Policy Portfolio that would serve as the Commission's long-term strategic asset allocation. The Policy Portfolio would be a multi-asset class portfolio with similar expected volatility as the Reference Portfolio. The Policy Portfolio would be expected to consolidate the then existing eighteen asset class Policy Portfolio into a more simplified allocation without substantially impacting the expected return, but with a similar level of risk as the Reference Portfolio. The purpose of setting the Policy Portfolio's risk target to that of the Reference Portfolio was to reveal the performance impact gained through diversification.

However, unlike the Reference Portfolio, the Policy Portfolio would be a portfolio that could be held and, in any respect, would serve as the gravitational pull to a more simplified Actual Portfolio.

The Commission considered the transition to a more simplified Policy Portfolio at its April and June 2019 meetings and reached consensus on the transition to the simplified target allocation in Table 2 below.

*Table 10 - Legacy Asset Allocation vs. 2020 Asset Allocation*

Legacy Asset Allocation (%)		2020 Asset Allocation (%)	
Nominal IG Bonds	6	Bonds	26
Treasuries	5	Private Debt	7
TIPS	2	Global Equity	46
Mixed Credit	4	Private Equity	9
EM Debt	4	Real Assets	12
Private Debt	7		
US Equity	18		
Developed Int'l Equity	11		
EM Equity	6		
Equity Options	7		
Private Equity	9		
Real Estate (Public)	1		
Real Estate (Private)	8		
Infrastructure (Public)	1		
Infrastructure (Private)	2		
PA Hedge Funds	10		
GTAA	7		
Other Opportunistic	1		

The Commission also analyzed whether the Policy Portfolio would meet the Commission's long-term investment objective in that it would likely exceed the assumed rate of return and avoid risks particular to the Plan including not meeting the General Assembly's funded status objectives and avoiding a significant probability of requiring additional contribution increases. This analysis was based on the Investment Consultant's 2019 Capital Market Expectations.

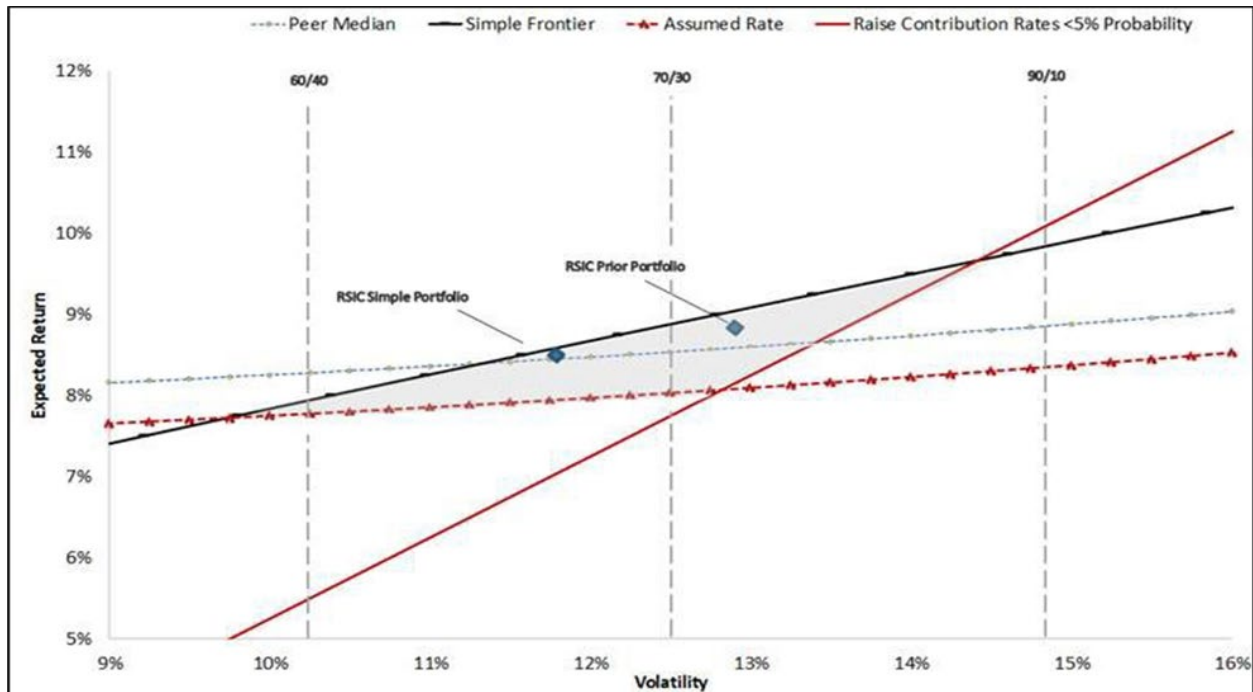
As demonstrated in Table 10<sup>4</sup>, the Policy Portfolio would be expected to:

1. exceed the assumed rate of return,
2. compare favorably to the simple frontier<sup>5</sup>,
3. compare favorably to the risk of the Reference Portfolio Benchmark; and
4. experience a less than 5 percent probability of requiring additional contributions increases in the next ten years (again other plan risks were also contemplated but would also be avoided because these risks would either fall along the same line or to the right of the risk line represented on the table).

<sup>4</sup> Although the Investment Consultant's long-term capital market expectations were based on projected asset class returns over twenty years, the Reference and Policy Portfolios' risk and return were calculated using these expectations to produce thirty-year results.

<sup>5</sup> The simple or efficient frontier comprises investment portfolios that offer the highest expected return for a specific level of risk. In this case, the investment portfolios along the simple frontier are limited to a mix of the five asset classes from the simplified portfolio shown in Table 12.

Table 11 - Expected Return vs. Volatility for RSIC's Prior and Simple Portfolios



In reaching consensus on the asset allocation, the Commission also considered what role each asset class would play in the overall portfolio with each asset class performing the primary role of growth, diversification, or yield:

**Public Equity:** This asset class includes investments in the stock of publicly traded companies. The purpose of public equity in the portfolio is growth. The excess return expectations for this asset class are low. The asset class is highly liquid and can be accessed with minimal implementation cost.

**Bonds:** This asset class includes investments in debt securities issued by governments, corporations, or other issuers. The primary purpose of bonds in the portfolio is diversification and the secondary purpose is to provide yield. The excess return expectations for this asset class are low and the asset class is expected to provide a persistent source of return while remaining highly liquid. Bonds are expected to serve a stabilizing function in times of market stress.

**Private Equity:** This asset class includes equity investments in privately held companies. Investors have historically been compensated with incremental return over comparable public equity investments in exchange for lower liquidity and increased business risk as compared to the public markets. The primary role of private equity in the overall portfolio is growth with an expected long-term return that exceeds public equity. The excess returns of this asset class are a source of magnitude of return for the portfolio the value of which is expected to exceed the higher cost of implementation as compared to public equity.

**Private Debt:** This asset class includes investments that provide alternative financing to businesses or assets and are in competition with traditional capital market or bank financing. Investors are compensated with incremental return over what can be achieved through traditional forms of lending

in exchange for lower liquidity as compared to liquid credit markets and for serving as a solutions provider to these businesses. The primary role of this asset class in the portfolio is yield. The expectations for the consistency of return above what can be achieved through bonds or the liquid credit markets is high.

**Real Assets:** This asset class includes investments in physical assets like real property and infrastructure, as opposed to financial assets like stocks and bonds. The primary role of this asset class is diversification with the secondary purposes of providing inflation protection and yield. Although the expected liquidity for this asset class is low, the expectations for excess return are high.

*Table 12 - Roles and Expectations of Asset Classes*

	<b>Public Equity</b>	<b>Private Equity</b>	<b>Bonds</b>	<b>Private Debt</b>	<b>Real Assets</b>
Primary role in portfolio (asset allocation)	Growth	Growth	Diversification	Yield	Diversification
Secondary role in portfolio (asset allocation)			Yield		Yield
Return expectation (20Y benchmark return)	High	> Public Equity	Low	> Bonds	Moderate
Alpha expectation where active: magnitude vs. cost	Low	High	Moderate	Moderate	Moderate
Consistency of excess return	Low	Moderate	Moderate	High	High
Expected liquidity	Very High	Very Low	Very High	Low	Low
RSIC Target Portfolio Expected Cost	Low	High	Low	Moderate	Moderate

The Commission believed that this change in approach to a five asset-class Policy Portfolio shifted the paradigm to one which values simplicity and holds a more complex portfolio accountable for improving risk-adjusted returns. A crucial component to ensure this accountability was having the appropriate benchmarks for the Policy Portfolio. The Commission was guided by the CFA Institute's recommendations that benchmarks are (i) specified in advance, (ii) appropriate, (iii) measurable, (iv) unambiguous, (v) reflective of investment options, (vi) owned, and (vii) investable. At its September 2019 meeting, the Commission reached consensus on the benchmarks in Table 13 for the Policy Portfolio.

*Table 13 - Asset Class Benchmarks for the Policy Portfolio*

Asset Class	Benchmark <sup>6</sup>
Public Equity	MSCI ACWI IMI Net
Bonds	Bloomberg Barclays Aggregate
Private Equity	Burgiss Private Equity
Private Debt	S&P LSTA +150 bps
Real Assets	NCREIF ODCE Net

Based on the 2019 Capital Market Expectations provided by the Commission’s Investment Consultant that the Commission utilized when reaching consensus on the Policy Portfolio, the Policy Portfolio would have been expected to achieve a twenty-year annualized rate of return of a 7.83 percent with an expected volatility of 11.69 percent. The portfolio would have been expected to have a 58.41 percent probability of earning a twenty-year annualized rate of return that met or exceeded the then assumed rate of return of 7.25 percent.

### Implementation

The Commission recognized that the CIO and investment staff may add value by structuring the Actual Portfolio in a manner that deviates from the Policy Portfolio target weights or may also pursue a strategy that causes the composition of an asset class to differ from the policy benchmark. As a result, the Commission provided the CIO and the investment staff with the discretion to structure the portfolio within the asset class and sub-asset class ranges in Table 14. In order to measure the risk and return impact of these portfolio structure decisions, the Commission designed an Implementation Portfolio Benchmark that aggregates the underlying benchmarks of each asset class and sub-asset class strategy according to their actual weights. Providing this discretion while establishing a structure that measures the value of these decisions also set the right balance of accountability for Commission decisions and those of the CIO and investment staff.

Table 14 - Target and Range Percentages for Asset Class and Sub-Asset Classes of the Implementation Portfolio

Asset Class	Target	Range	
Public Equity	46%	30%	60%
<i>Domestic</i>	<i>Index</i>	<i>Index +/- 6%</i>	
<i>Developed Non-US</i>	<i>Index</i>	<i>Index +/- 6%</i>	
<i>Emerging Market</i>	<i>Index</i>	<i>Index +/- 4%</i>	
<i>Equity Options</i>	0%	0%	7%
Bonds	26%	10%	35%
<i>Core Bonds (IG)</i>	26%	10%	35%
<i>Inflation-linked (IG)</i>	0%	0%	5%
<i>Mixed Credit (non-IG)</i>	0%	0%	8%
<i>EM Debt</i>	0%	0%	6%
<i>Net Cash/Short Duration</i>	0%	0%	7%

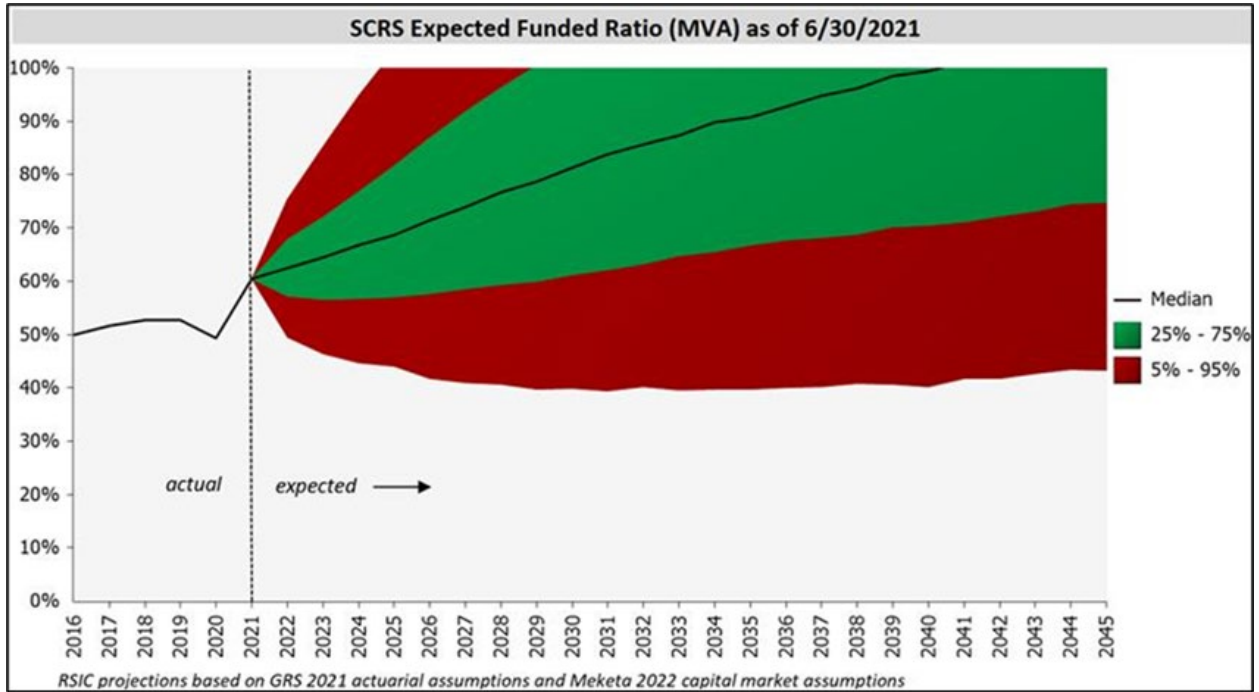
<sup>6</sup> The Private Equity and Private Debt portfolios and benchmarks will be reported on a 3-month lag. MSCI ACWI IMI Net - Morgan Stanley Capital International All Country World Index Investable Market Index; S&P LSTA - Standard & Poor’s Loan Syndication and Trading; and NCREIF ODCE – National Council of Real Estate Investment Fiduciaries Open End Diversified Core Equity.

<b>Asset Class</b>	<b>Target</b>	<b>Range</b>	
Private Equity	9%	5%	13%
Private Debt	7%	3%	11%
Real Assets	12%	6%	18%
<i>Real Estate</i>	9%	5%	13%
<i>Infrastructure</i>	3%	0%	5%

Despite changes in market conditions and fluctuations in capital market expectations, the Commission adhered to the discipline of only comprehensively reviewing the strategic asset allocation once every five years and made no material change the asset allocation or other provisions of this section in the intervening time-period. The Commission conducted its first subsequent strategic asset allocation review in Fiscal Year 2024-2025.

**XII. TABLES 1 AND 2 (PRIOR YEAR VERSIONS)**

*Table 15 - SCRS Expected Funded Ratio as of 6/30/2021 (2022)*



*Table 16 - SCRS Expected Funded Ratio as of 6/30/2020 (2021)*

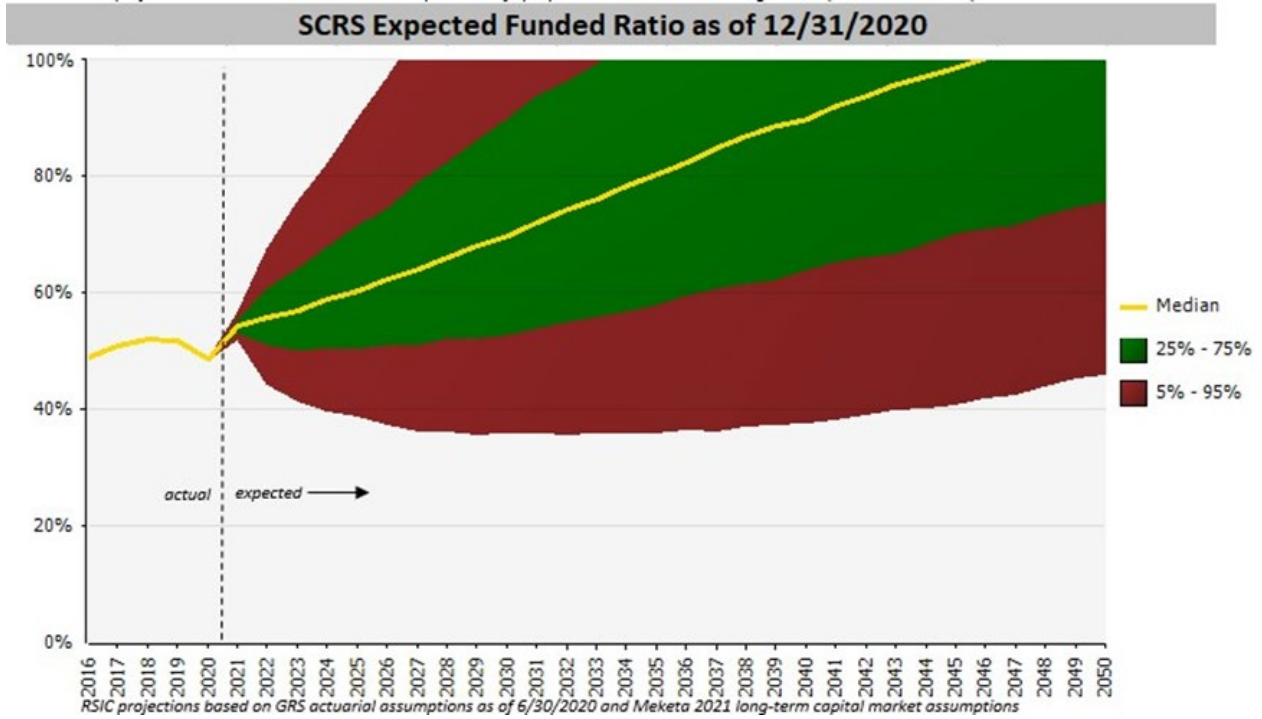


Table 17 - SCRS Expected Funded Ratio as of 6/30/2019 (2020)

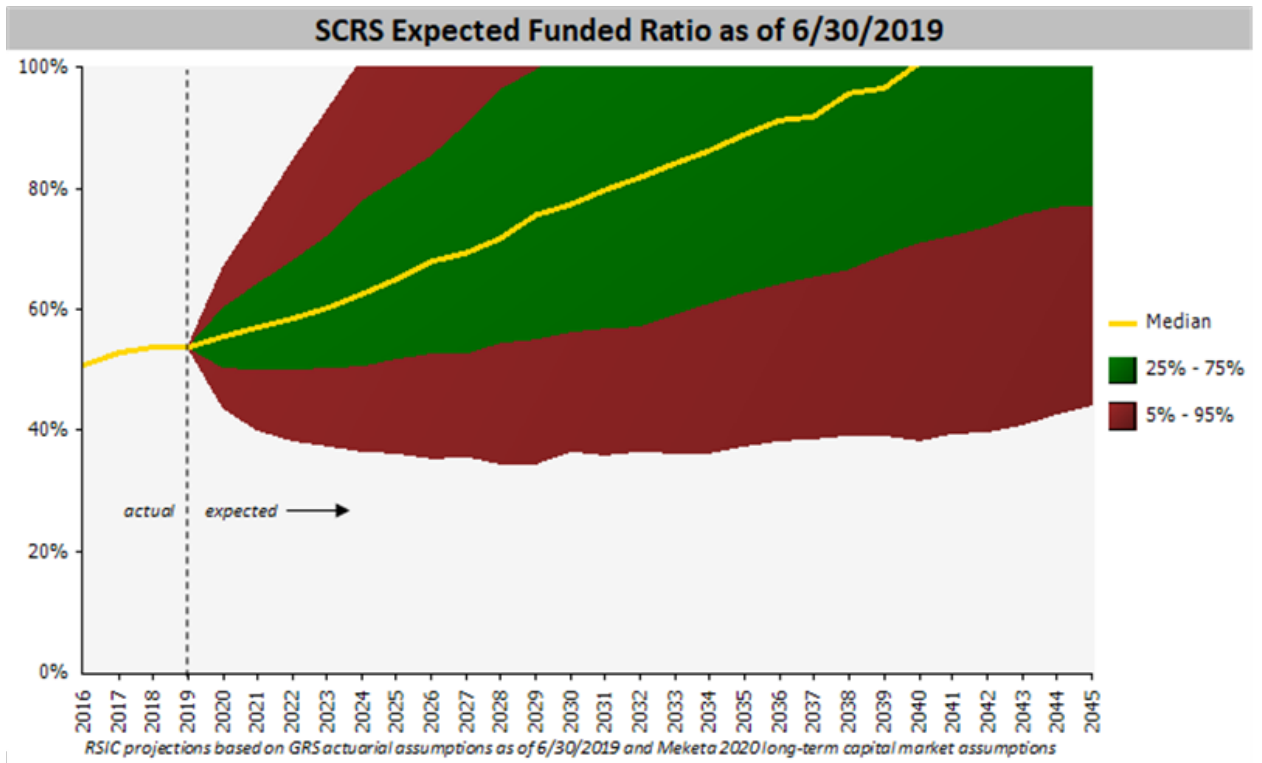


Table 18 - SCRS Expected Total Contribution Rate as of 6/30/2021 (2022)

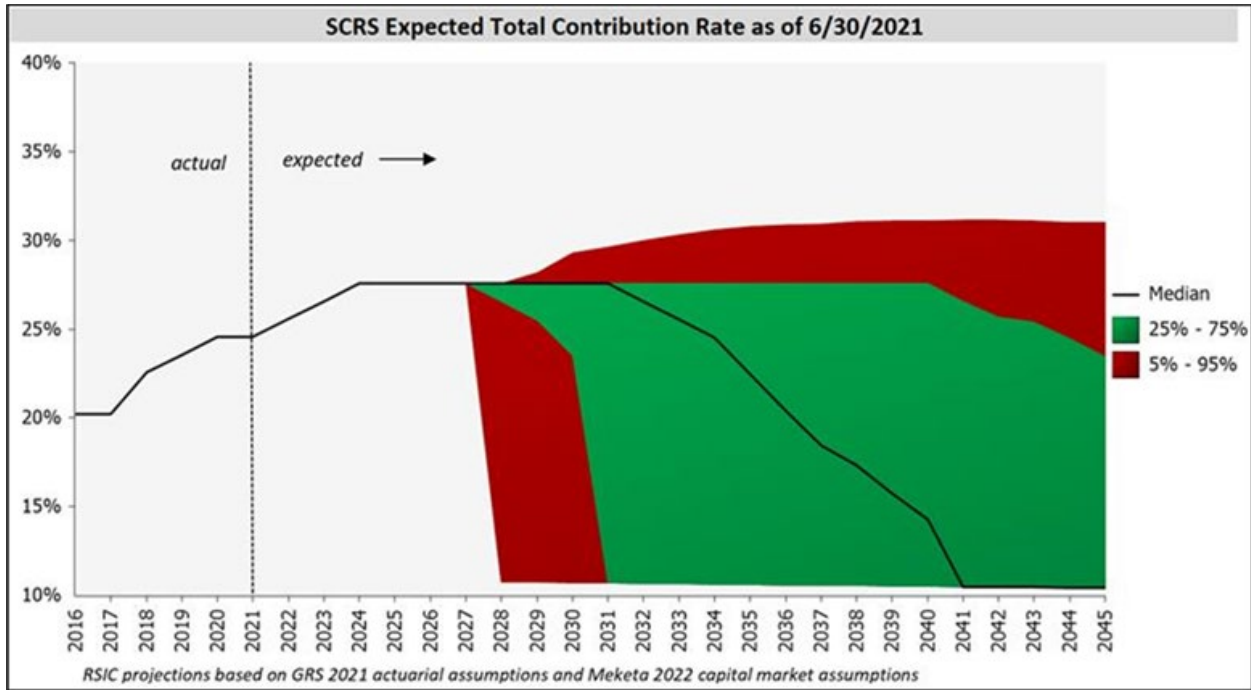


Table 19 - SCRS Expected Total Contribution Rate as of 6/30/2020 (2021)

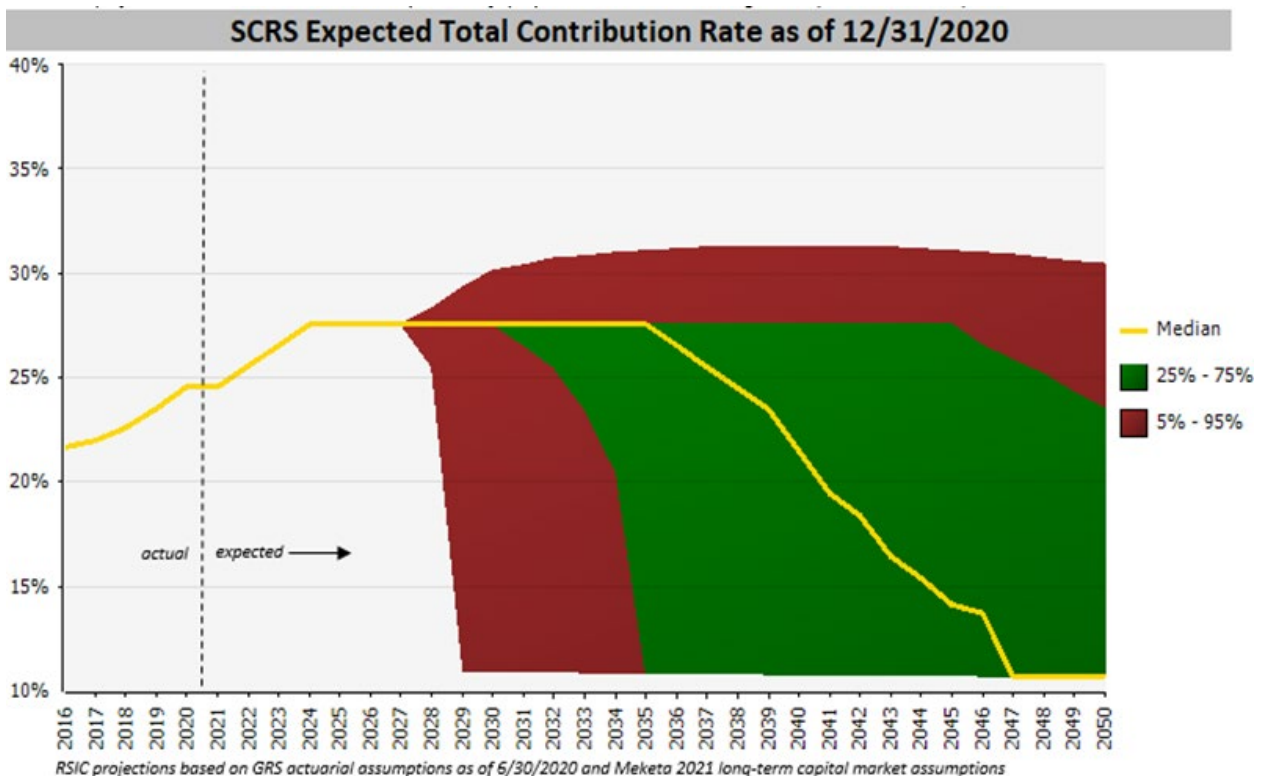
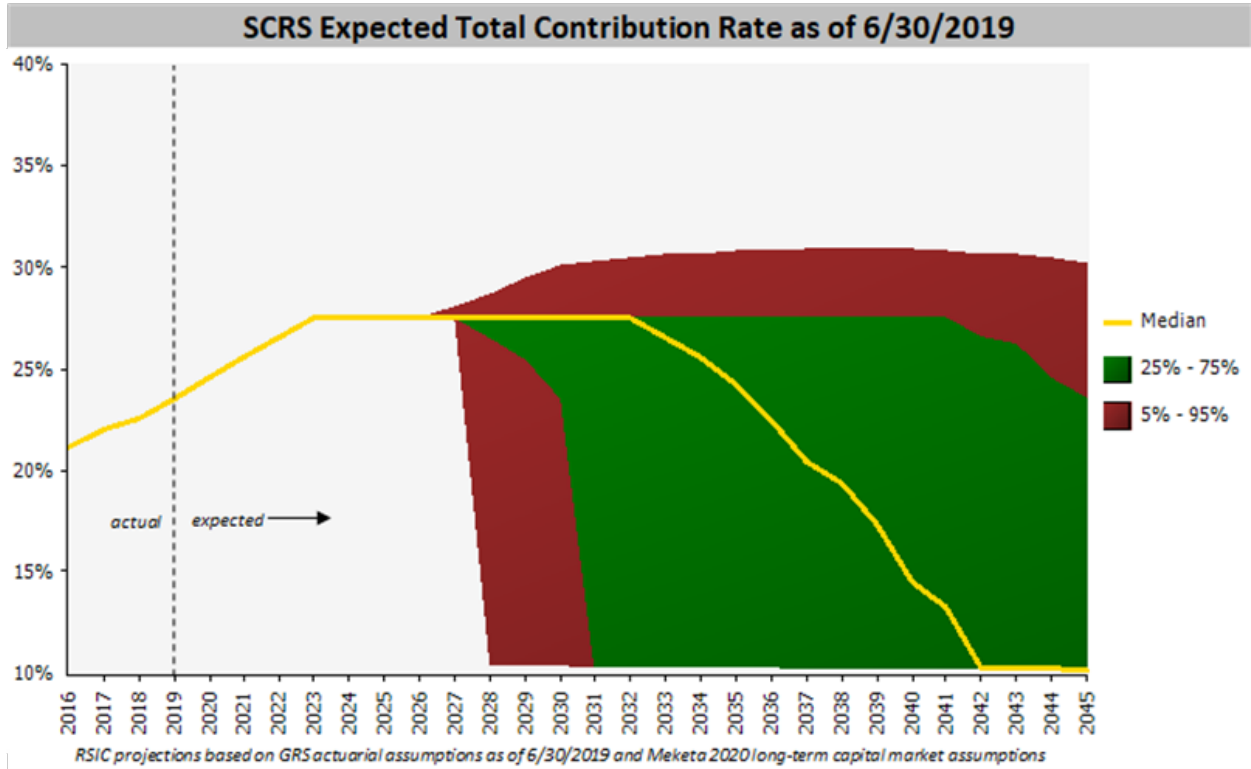


Table 20 - SCRS Expected Total Contribution Rate as of 6/30/2019 (2020)



# Delegated Investments (March 5, 2026 to April 2, 2026)<sup>1</sup>

Asset Class	Investment	Investment Amount	RSIC Commitment Date
Private Equity	Spark Capital Growth Fund VI	\$70 M	March 31, 2026
Private Equity	Spark Capital IX	\$30 M	March 31, 2026

<sup>1</sup> Section III of the Commission’s Investment Authority Delegation Policy (“Delegation Policy”) limits the size of delegated investments depending upon type and also provides that the “amount of delegation for new investments approved pursuant to this policy shall not exceed 5% of the total value of Plan assets between regularly scheduled Commission meetings.” All of the delegated investments listed in this report comply with the Delegation Policy’s size limits and “between meetings” test.