Investment Policy Statement

Prepared for Episcopal Pooled Fund of CT
As of 07/17/2014

Introduction:
This Investment Policy Statement (IPS) is intended to be the governing document for Bank of America, N.A. (the "Investment Manager") to follow for the management of the investment portfolio entrusted to the Investment Manager, and as such details objectives, risk tolerance, and spending requirements. The information contained within the IPS will be used to formulate an appropriate and effective investment plan.

Overall Risk Tolerance and Investment Objective:
We recognize that no investment is free from risk, and have considered the following risk categories and definitions in the development of this Investment Policy Statement:

  Volatility Risk: Volatility Risk is the potential for loss in the value of the portfolio due to year-to-year fluctuations in return relative to the one-year expected return.

  Concentration Risk: Concentration Risk is the potential for loss in the value of the portfolio due to a substantial overweight in any sector(s), sub-sector(s), industry(ies), or security(ies).

  Credit Risk: Credit Risk is the potential for loss in the value of the portfolio due to a decline in the credit-worthiness of an investment.

  Inflation Risk: Inflation Risk is the loss of purchasing power due to the decline in value of the monetary unit on which the investment is based.

  Liquidity Risk: Liquidity Risk is the inability to sell an investment in a timely manner without offering a discount to its fair value.

The overall Investment Objective is Balanced Return:

  This objective focuses on capital appreciation with a secondary focus on current income through a higher allocation to equities than fixed income, and where appropriate, other asset classes.

Time Horizon:
The time horizon for this portfolio is greater than ten years.

Investment Authority:
The investment authority has been delegated to the Investment Manager who will be responsible for the investment management of the portfolio within the guidelines of this IPS.

Investment Restrictions and Special Instructions:
The Investment Manager is restricted from purchasing investments in the following asset class(es): Equity - Special Situations, Equity - Other, Fixed Income - Special Situations, Hedge Funds and Private Equity.

Trustees of the Donations and Bequests Committee of the Diocese have requested that preferred stocks be included as a potential asset class within the fixed income allocation. The strategic target for such assets shall be 3-4%, with a policy range of 0-6%. This is reflected in the "fixed income other" category of the asset allocation portion of this document.

Note: The Investment Manager may not be able to fully implement such restrictions when mutual funds and other pooled investment vehicles are utilized. Additionally, items such as market volatility, changes in company focus and foreign operating businesses result in a degree of subjectivity in classifications such as capitalization, sector or country. The Investment Manager intends to follow these restrictions as closely as possible given these constraints.
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Customized Asset Allocation:
The portfolio will be invested in accordance within the Policy Maximum and Minimum Range for each asset category described below. The asset allocation, Strategic Target, and Policy Maximum and Minimum Range have been established in accordance with the overall risk and return objectives of the portfolio, as well as the Spending Policy.

Since the total portfolio is expected to be broadly diversified with respect to asset classes and asset class managers, the Investment Manager is allowed latitude in constructing the components of the total portfolio, consistent with its style of management.

<table>
<thead>
<tr>
<th>Asset Class</th>
<th>Strategic Target</th>
<th>Policy Range</th>
<th>Reference Benchmark</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td>3.00%</td>
<td>0.00%-20.00%</td>
<td>Merrill Lynch 90 Day T-Bill</td>
</tr>
<tr>
<td>Equity</td>
<td>57.00%</td>
<td>36.00%-76.00%</td>
<td>S&amp;P 500</td>
</tr>
<tr>
<td>U.S. Large Cap</td>
<td>27.00%</td>
<td>20.00%-40.00%</td>
<td>Russell 1000</td>
</tr>
<tr>
<td>U.S. Mid Cap</td>
<td>5.00%</td>
<td>2.50%-12.00%</td>
<td>Russell MidCap Index</td>
</tr>
<tr>
<td>U.S. Small Cap</td>
<td>5.00%</td>
<td>2.50%-12.00%</td>
<td>Russell 2000 Index</td>
</tr>
<tr>
<td>International - Developed</td>
<td>10.00%</td>
<td>5.00%-15.00%</td>
<td>MSCI EAFE Net Total Return EAFE USD Index</td>
</tr>
<tr>
<td>Emerging Markets</td>
<td>10.00%</td>
<td>0.00%-10.00%</td>
<td>MSCI Emerging Markets Free Index (Gross)</td>
</tr>
<tr>
<td>Fixed Income</td>
<td>30.00%</td>
<td>16.00%-45.00%</td>
<td>Barclays Capital Aggregate Bond Index</td>
</tr>
<tr>
<td>Investment Grade</td>
<td>16.50%</td>
<td>13.00%-35.00%</td>
<td>Barclays Capital Aggregate Bond Index</td>
</tr>
<tr>
<td>International Developed Bonds</td>
<td>5.00%</td>
<td>0.00%-7.50%</td>
<td>JP Morgan Non-US Gov't Unhedged Index</td>
</tr>
<tr>
<td>High Yield</td>
<td>5.00%</td>
<td>3.00%-8.00%</td>
<td>Merrill Lynch High Yield Master Index</td>
</tr>
<tr>
<td>Fixed Income - Other</td>
<td>3.50%</td>
<td>0.00%-6.00%</td>
<td></td>
</tr>
<tr>
<td>Real Estate</td>
<td>5.00%</td>
<td>0.00%-10.00%</td>
<td>NAREIT Equity Index</td>
</tr>
<tr>
<td>Tangible Assets</td>
<td>5.00%</td>
<td>0.00%-7.50%</td>
<td>Dow Jones UBS Commodity Index</td>
</tr>
</tbody>
</table>

Rebalancing Strategy:
Rebalancing the portfolio allocation with the Policy Strategic Target allocation ranges for the various asset classes serves the purpose of maintaining the risk and expected return of the portfolio within parameters stated in the Investment Policy Statement. Reallocations among asset classes and managers shall reflect the following considerations:

1) Generally allocated toward maintaining the strategic allocation targets over time; and/or

2) The Investment Manager will rebalance the portfolio with the asset allocation ranges stated herein when the risk and expected reward potential is perceived to be such that an asset class weighting should be tilted toward the approved policy maximum or minimum.

Performance Benchmarks and Measurement:
Performance will be reviewed periodically.
Investment performance will be compared against a Policy benchmark based on the investment objective. The Policy benchmark against which the portfolio's performance will be measured is 10% Russell 1000 Growth, 10% Russell 1000 Value, 4% Russell Midcap Growth, 4% Russell Midcap Value, 2.50% Russell 2000 Growth, 2.50% Russell 2000 Value, 4,40% MSCI EAFE Growth, 4,40% MSCI EAFE Value, 7% MSCI Emerging Markets, 2.20% S&P Developed X US Small Cap, 31% Barclays Aggregate Index, 3.20% Merrill Lynch HY Master, 80% JP Morgan ELMI+, 3% Barclays Global Aggregate x US, 5% MSCI US REIT and 6% Dow UBS Commodity Index.
Investment performance will also be compared against a secondary policy benchmark. The secondary policy benchmark against which the portfolio's performance will be measured is 60% S&P & 40% Barclays Aggregate.
Updating Information:
This Investment Policy Statement shall be reviewed at least once annually. This Investment Policy Statement may be modified in whole or in part at any time, and the changes shall be communicated to the Investment Manager in writing and signed by a duly appointed representative of the organization.
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Acknowledgement

This Investment Policy Statement is acknowledged and adopted as of the date below:

Theresa Dupont

for the Donations & Bequests Committee, Episcopal Diocese of CT.

Date: 7.28.14