

# Township of Brock Corporate Policy

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**Policy Name:** Investment Policy

**Policy Type:** Finance

**Policy Number:** F5

**Reference:**

**Date Approved:** March 2024

**Date Revised:** November 2025

**Approval By:** XX

**Point of Contact:**

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## **Purpose of Policy:**

The purpose of this policy is to invest the Township's funds in a prudent manner. In order of priority, the investment objectives are:

- Legality of investments
- Preservation of principal
- Maintenance of liquidity
- Competitive rate of return

## **Scope:**

This policy will cover the investment of surplus cash and reserve funds of the Township of Brock in accordance with the relevant enabling legislation.

## **Policy:**

### **Legality of Investment**

The Township may only invest in conformance with the Ontario Municipal Act and Ontario Regulation 438/97. In accordance with this Act, and specifically section 167(2), the list of eligible securities is attached as Schedule 1.

### **Preservation of Principal**

The Township's investments shall ensure the preservation of capital in the overall portfolio. This policy minimizes risk by limiting investments to those that protect principal through conservative investments and a diversified portfolio. All investments must have a "safety" and "liquidity rating" of high to medium, in accordance with Schedule 1.

The portfolio shall be diversified by:

- Investing in securities of varying maturities while providing for stability of income
- Investing a portion of the portfolio in readily available funds to ensure appropriate liquidity is maintained to meet ongoing obligations.

### **Maintenance of Liquidity**

The portfolio shall have liquidity sufficient to meet all operating requirements that may be reasonably anticipated. No investment shall be made in a security with a term to maturity exceeding ten (10) years. A minimum of 20% of the portfolio must be invested in securities having a term of one year or less.

Investments for terms more than one year are restricted to any of the Canadian Federal, Provincial, and Municipal governments, the 5 largest Canadian Schedule 1 banks ranked by assets, and institutions guaranteed by the aforementioned.

The maximum that may be invested in any one industry group will not exceed the limit as set out in Schedule 2, unless authorized by Council by way of resolution.

### **Competitive Rate of Return**

The investment portfolio shall be designed with the goal of maximizing the long-term rate of return through budgetary and economic cycles, considering the investment risk constraints and liquidity needs.

Return on investment is of secondary importance when compared to the safety and liquidity objectives. Investments are restricted to those low-risk securities prescribed within the limits of the Ontario Municipal Act and Ontario Regulation 438/97

### **Limits of Investments – See Schedule 2**

High Interest Savings Accounts (HISA). A HISA is fully liquid and classified as a bank account. Although, included as part of the investment portfolio, it is not classified as a security investment and therefore not included or subject to Schedule 1 or 2 limitations.

## **Standard of Care**

### **a) Prudence**

Staff and/or the investment institution representatives shall act with impartiality, loyalty and prudence; shall maintain overall portfolio risk at an appropriate level in consideration of the Township's needs; and ensure the portfolio is diversified.

Staff and/or the investment agent(s) shall exercising due diligence and acting in accordance with this Policy shall be relieved of personal responsibility for an individual security's credit risks or market prices changes, provided deviations from expectations are reported in timely fashion and the liquidation or the sale of securities are carried out in accordance with the terms of the Policy.

### **b) Ethics and Conflicts of Interest**

Staff and investment agent(s) involved in the investment process shall refrain from personal business activity that could conflict with the proper execution and management of the investment program, or that could impair their ability to make impartial decisions. These personnel shall disclose any material interests in financial institutions in which they conduct business. They shall further disclose any personal financial/investment positions that could be related to the performance of the investment portfolio. They shall not undertake personal investment transactions with the same individual(s) with whom business is conducted on behalf of the Township.

## **Investment Advisor/Manager Eligibility Criteria**

The Township may use the services of an investment agent (advisor, firm, etc.) approved by the Treasurer. To be eligible to manage the Township's portfolio or investments, the Investment Advisor/Manager must have adequate resources, applicable investment credentials and be able to provide a report, when asked, setting out investment performance for the past five (5) years, demonstrating that investment performance meets that of the benchmarks of the managed portfolios.

## **Reporting**

When investments are held, the Treasurer or Deputy Treasurer will prepare an annual report to Council outlining the investments held in each fund. The report will summarize the investments in a manner that will enable Council to determine whether the investment activities during the reporting period have conformed with the investment policy including but not limited to: the list of securities held; maturity dates; and the percentage of total portfolio that each type of investment represents. This report will outline the annual total investment return and compare the return with budgetary expectation. The report shall indicate any areas of policy concern and/or planned revision of investment strategies.

### **Administrative Procedures:**

The Treasurer, or their designate, are responsible for ensuring that all investments held by the Township of Brock meet the requirements of this policy. Each investment undertaken must be authorized by the Treasurer (or designate) and by the Mayor (or designate). In addition, the CAO will be provided with a copy of all investment purchases and will be required to sign that they are aware of the transaction.

The Treasurer of the Corporation of the Township of Brock or his/her delegate (provided the Mayor has provided authorization for purchase of investments) has the authority:

- To enter into arrangements with banks, investment brokers, and other financial institutions for the purchase, sale, redemption and safekeeping of securities;
- To execute and sign documents on behalf of the Corporation of the Township of Brock;
- To perform all related acts in the day-to-day operation of the investment program.

All investment transactions are recorded and interest earnings distributed to the various funds in accordance with Township policies and general accepted accounting principles for municipalities.

No person may engage in an investment transaction except as provided under the terms of this Policy.

### **Monitoring of Asset Mix**

The Treasurer will monitor the asset mix of the portfolio at least quarterly to ensure that the mix is within the guidelines established in this Policy.

### **Review Cycle:**

This policy will be reviewed in each term of Council.

**Schedule 1: Eligible List of Investments Under this Policy**

<b>Type of Investment</b>	<b>Safety</b>	<b>Liquidity</b>	<b>Rate of Return</b>
Banker's Acceptances	High	High	High
Bearer Deposit Notes	Medium	High	High
Cdn. Treasury Bills	High	High	Low
Commercial Paper	Low	Medium	High
Municipal Prom. Note	High	Low	Medium
Bank Subsidiary Paper	Medium	Medium	High
Provincial and Federal T-Bills	High	High	Low
Term Deposits	Medium	Medium	Medium
G.I.C.'s	Medium	Medium	Medium
CMHC Mortgage-Backed Securities	High	Medium	High
Floating Rate Notes	Medium	Low	High
Federal/Provincial Bonds	High	High	Low
Municipal Debentures	High	Low	High
Corporate Bonds Debentures/Promissory Notes	Low	Low	High
Principal Protected Notes	Medium	Medium	High

Note: High Interest Savings Accounts (HISA) is classified as a bank account not a security.

**Schedule 2: Limits of Investment**

Industry Group	Industry Sector	Maximum Portfolio Share	Limit Per Institution
Government	Federal & Agencies	100%	None
	Provincial & Agencies	100%	None
Banks	Schedule 1: Domestic Banks	100%	None
	Schedule 2: Foreign Bank Subsidiaries	50%	\$5M or 50% of Total Portfolio, which is less
	Schedule 3: Foreign Bank Branches	20%	\$2M or 15% of Total Portfolio, which is less
Canadia Credit Unions	Federally/Provincially Regulated	35%	\$3M or 35% of Total Portfolio, which is less
One Investment	LAS (MFOA/AMO)	50%	50% of Total portfolio
Other			By resolution of Council

**Examples of Banks and Credit Unions**

Schedule 1: Royal Bank, TD Bank, Scotia Bank, Bank of Montreal, CIBC, etc.

Schedule 2: AMEX Bank, Cidel Bank, HSBC, etc.

Schedule 3: Capital One, Citibank, Deutsche Bank, etc.

Credit Unions: Meridian, Desjardins, Alterna, Duca, etc.

This document is available in alternate formats upon request.

Please contact the Clerk's Department at 705-432-2355 or [clerks@townshipofbrock.ca](mailto:clerks@townshipofbrock.ca).