

SWIB Investment Committee
WISCONSIN RETIREMENT SYSTEM
INVESTMENT GUIDELINES

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I. INTRODUCTION

The SWIB Board of Trustees (the “Board”) has delegated to the investment staff of SWIB standing authority to manage the assets of the Core Retirement Trust Fund (the “Core Fund”) and the Variable Retirement Trust Fund (the “Variable Fund”), which together make up the Wisconsin Retirement System (the “WRS”), pursuant to the Board’s WRS Investment Policy and to section 25.15(2) of the Wisconsin Statutes and section IB 2.02 of the Wisconsin Administrative Code. The Investment Committee was created to provide oversight of WRS¹ investments within the parameters established by the Board and pursuant to the Investment Committee’s Charter approved by the Board. To properly and prudently execute its delegated authority and oversight functions, the Investment Committee has established guiding policies, guidelines and procedures, which are set forth in this document, the Investment Committee Investment Guidelines (these “IC Guidelines”). These IC Guidelines articulate the policies and guidelines that are employed in the day-to-day management of the WRS assets by SWIB’s staff. This document will be reviewed periodically and updated as necessary by the Investment Committee to reflect changes in investment strategies and to reflect best industry practices for prudent investors. Notwithstanding the delegation of authority by the Board to the Investment Committee for the establishment, approval, and amendment of the policies, guidelines and procedures included in these IC Guidelines, the Board reserves all rights to modify and amend these IC Guidelines at any time in its discretion. Any changes to these IC Guidelines will be periodically reported to the Board. In addition to these IC Guidelines, SWIB staff may also have to comply with Risk, Compliance Division or legal requirements, and review operational readiness with Operations staff prior to the trading of the instruments and securities authorized herein.

II. LEVERAGE USE POLICY

Introduction

Leverage is an exposure to an asset that is not fully collateralized by cash assets or an exposure to an asset acquired that has not been fully funded. Leverage by itself does not necessarily create additional market risk or variation in market returns. Leverage may result in greater diversification and lower market risk than an unlevered portfolio under normal market conditions. The funds managed by SWIB can have exposure to leverage through different structures, instruments and vehicles.

SWIB uses leverage in two primary ways. The first is to express the overall policy asset allocation, which includes leverage (“Policy Leverage”). Generally, Policy Leverage is implemented passively. The total amount of Policy Leverage is approved by the Board through the WRS asset allocation process. The Board-approved asset allocation targets for each asset class together with the approved Policy Leverage is called the “Policy Portfolio.” The second use of leverage is to fund the alpha pool (“Alpha Pool Leverage”), which overlays alpha-producing strategies on the overall Core Fund Policy Portfolio. Those alpha strategies are funded with additional leverage but

¹ The Investment Committee also has oversight of the State Investment Fund and other funds managed by SWIB as described in the Board’s SIF and Separately Managed Funds Investment Policy and Guidelines.

are not part of the Policy Portfolio. The total amount of Alpha Pool Leverage is limited by the Board-approved active risk target and range.

Certain internal active portfolios are also authorized to use portfolio-specific leverage. The Core Fund may provide limited unallocated cash (“Temporary Leverage”) to such internal active portfolios, and to other portfolios, to fund short-term financing needs, and charge a market-based funding rate to the applicable portfolio. Active internal and external portfolios may also fund portfolio leverage by financing assets within the portfolio.

Use of leverage introduces distinct liquidity risk that can vary based on leverage sources and margin requirements. Often, leverage requires liquid assets to satisfy margin obligations. Liquidity risk is managed by monitoring the level of liquidity required in various market scenarios and ensuring that an adequate reserve of liquid assets is available to meet commitments in times of market stress. Having a variety of leverage sources diversifies the refinancing risk and mitigates cost under varied market scenarios.

Alpha Pool and Policy Leverage can be generated through several different mechanisms. These mechanisms may be utilized in different proportions given market conditions and asset allocations. Each of these mechanisms have unique counterparty dynamics and risks, all of which are addressed by SWIB’s counterparty risk framework.

Derivative instruments. Leverage can be gained by replacing a physical instrument with a derivative instrument such as a futures contract, a swap contract, or a forward contract. Most of the proceeds generated from the sale of the physical instrument can then be used to finance further investment. The cost of the leverage is imbedded in the price of the derivative instrument. Use of derivative instruments provides the ability to source large scale leverage across many different asset classes in a standardized format. There is a risk of tracking error, or basis risk, between the physical instrument and the derivative instrument that could result in the returns of the two instruments diverging.

Securities Lending Cash Collateral. Through the course of securities lending, cash collateral may be received from borrowers. This cash may be used to finance leverage needs without creating basis risk. The available cash fluctuates day to day and is governed by the borrowing demand of and choice of collateral posted by market participants.

Repurchase Agreements (Repo). Repo is another way to gain leverage from physical instruments, like securities lending, without using derivative instruments. While securities lending relies on borrowing demand for the physical instrument, repo can generate leverage from physical instruments that do not have borrow demand, and also creates zero basis risk. The repo and the underlying asset management may be executed internally, externally or a mix of the two. An agency repo model can be used to facilitate operational scale, collateral efficiency, and market access by partnering with an external agent.

Secured Borrow Agreements. Physical instruments can be pledged as collateral in a secured borrow agreement to gain financing from a bank or other financial institution, as and when needed. This form of financing creates zero basis risk and may have maturities

ranging from three to six months. The stability of the available capital can vary based on the financing bank's or financial institution's balance sheet constraints.

Unsecured Borrowing. Unsecured borrowing, such as the issuance of commercial paper, is another way to gain leverage without encumbering assets or requiring collateral. This form of borrowing can diversify the cash providers purchasing the debt providing SWIB with access to new borrowing sources. SWIB's commercial paper pilot program ("CP Pilot Program") managed by the Liquidity Management and Beta Implementation ("LMBI") Division shall not exceed \$2 Billion face amount outstanding in the aggregate. The LMBI Division shall report on the CP Program to the Investment Committee on a quarterly basis.

New mechanisms may be added from time to time and included herein.

Leverage Use Philosophy

Leverage is used where it can improve investment portfolio efficiency in terms of return for risk versus alternative choices that do not use leverage. Leverage will also be used to improve portfolio diversification and reduce portfolio concentration.

Leverage Monitoring

Detailed reporting is regularly (i.e., daily, monthly and quarterly) produced by SWIB to provide feedback regarding leverage exposures for review by portfolio managers, the head of Asset and Risk Allocation (ARA), the head of LMBI, the Risk Management Division, and the Executive Director/Chief Investment Officer (ED/CIO). Leverage use risk metrics are reported at least quarterly to the Investment Committee. Leverage use is also periodically reported by the ED/CIO to the Board.

Policy and Alpha Pool Leverage Guidelines

1. Leverage ratios govern leverage derived from beta sources (i.e., from levered asset class exposures). Established leverage ratio ranges for each levered asset class are set forth below. Current Leverage Ratio is defined as the ratio of notional exposure to capital available in the portfolio (or total exposure to unencumbered exposure in the case of repo). If the Current Leverage Ratio for any levered asset class exceeds the Maximum Target Leverage Ratio, SWIB will, within 30 days (unless such time limit is waived by the ED/CIO), reduce exposure or add capital to bring the Current Leverage Ratio within the established range. A Current Leverage Ratio below the Minimum Target Leverage Ratio will be monitored as part of the overall optimization of capital and funding costs.

Levered Asset Class	Minimum Target Leverage Ratio	Target Leverage Ratio	Maximum Target Leverage Ratio
<i>US Large Cap Equity</i>	2.7	3.3	4.0
<i>US Small Cap Equity</i>	2.7	3.3	4.0
<i>MSCI World xUS Equity</i>	2.7	3.3	4.0
<i>US TIPS</i>	6.0	8.0	10.0
<i>US Treasuries</i>	8.0	10.0	12.0

Variable Fund Liquidity Management

While the Variable Fund asset allocation does not explicitly include leverage, the same mechanisms may be used to manage the liquidity position of the Variable Fund. For example, derivative instruments and/or securities lending cash collateral may be used to manage the liquidity position of the Variable Fund. Variable Fund liquidity will be optimized to facilitate rebalancing activity, meet fund outflows (e.g., benefit payments) or manage other liquidity needs.

III. DERIVATIVES USE POLICY

Introduction

A "derivative instrument" is an investment instrument which usually derives its value and marketability from an underlying instrument which represents direct ownership of an asset or a direct obligation of an issuer (e.g. a "spot" or cash market instrument). SWIB recognizes that derivatives provide a means through which SWIB can implement investment strategies in a more cost and time efficient manner than through the physical investment of the underlying securities. Additionally, derivatives can be used to facilitate SWIB's risk management activities including risk mitigation. Derivatives include such instruments as futures, swaps, options and currency forwards and may be exchange traded, traded over-the-counter (OTC) and/or cleared.

Derivatives Use Objectives

The overall strategic objective of SWIB's use of derivatives is to facilitate risk exposure management and to manage the cost of investing. Objectives for derivatives use include:

1. Constructing portfolios with risk and return characteristics that could not efficiently be created using underlying physical securities,
2. Changing systematic exposures without executing trades in the underlying physical securities,
3. Hedging or managing risks, and
4. Effecting varying active and passive investment strategies including, but not limited to: portable alpha, currency hedging, equitization, relative value trades, transition management, and rebalancings.

Derivatives Use Monitoring and Reporting

Derivatives use exposures will be monitored by portfolio managers that employ derivatives and incorporated as part of the overall risk monitoring of the strategy by the ED/CIO and the Risk Management Division. The Investment Committee will be notified of material risks identified.

Derivatives Guidelines Applicable to all WRS Internal Portfolios:

1. Exchange-traded derivatives must be traded on a recognized exchange approved by the Investment Committee, except for exchange-traded derivatives that are traded pursuant to Exchange for Related Position (EFRP) transactions, which are traded off-exchange and not subject to this requirement. Such approved exchanges are listed on *Appendix 1*. As additional exchanges are approved *Appendix 1* shall be updated without amendment to these IC Guidelines.
2. OTC derivatives may only be traded with counterparties with which SWIB has a current International Swap and Derivative Association (ISDA) agreement that includes a Credit Support Annex (CSA).

In addition:

- a) The counterparty, or its guarantor, must, on each date on which a transaction is entered into, have an actual credit rating of not less than: (1) "A2/P2" on short-term debt from S&P or Moody's; and/or (2) "Baa2/BBB" on long-term debt from S&P or Moody's.
- b) The collateral that SWIB holds under a CSA may be invested in the following:
 - i. Bank deposit accounts;
 - ii. Any money market fund having a rating of at least "Aaa" by Moody's or at least "AAA" by S&P;
 - iii. Overnight commercial paper having a rating of at least "P-1" by Moody's and "A-1" by S&P;
 - iv. Overnight repurchase agreements with U.S. government, agency or dollar cash collateral;
 - v. Overnight reverse repurchase agreements with U.S. government, agency or dollar cash collateral; and
 - vi. The State Investment Fund or similar short term investment funds.
3. For clarity, Items 1 and 2 do not apply to exchange-traded funds (ETFs), or to over-the-counter derivatives entered into on behalf of SWIB, or a title-holding entity that is wholly-owned by SWIB, by either an external manager or advisor in connection with a real estate separate account.
4. Investments may be made in exchange-traded notes (ETNs) which are traded on exchanges included on an approved-exchange list maintained by the Compliance Division. The Risk and Compliance Divisions shall be notified upon any investment in a new ETN.

5. Investments may be made in put option contracts and call option contracts on securities, futures or an index of a group of securities. Put and call options may be purchased or sold on investments that could be held in the portfolio if the options were exercised.
6. Currency exposure management is permitted (but not required) through the use of exchange-traded currency instruments, and through the use of spot and forward contracts in foreign currencies (including FX Swaps). Direct currency hedging is permitted to directly hedge currency exposure back to the U.S. dollar. Cross-currency exposure management to transfer out of an exposed currency and into a benchmark currency is permitted.
7. Guideline limits and soft parameters for each portfolio will be applied to the aggregate exposures which include both physical and synthetic securities.
8. New derivatives instruments will be reviewed and approved by the Investment Committee before their implementation or use.
9. SWIB shall not enter into new derivatives agreements with new counterparties until the ED/CIO has approved the agreement. Each relevant division head or portfolio manager shall submit to the ED/CIO a written summary of any proposed addition of a relationship that may require evaluation of counterparty credit risks. Such relationship may involve (a) entering into a master netting or trading agreement with a new counterparty, which acts either as a principal or as an agent on behalf of multiple principals, or (b) hiring an external manager to implement a strategy that may require the manager to evaluate and monitor counterparty credit risks on SWIB's behalf (excluding external managers selected by Private Markets and Funds Alpha staff and LMBI staff pursuant to their portfolio guidelines). The ED/CIO will review all proposals of such new relationships to determine that (i) the addition of the relationship is consistent with SWIB's investment goals and strategies, (ii) the appropriate loss and drawdown limits for the credit risk associated with the proposed counterparty relationship have been considered, and (iii) appropriate due diligence has been conducted. The relevant division head or portfolio manager ("Initial Division User") shall retain responsibility for monitoring any such approved relationship. If another division expects to use the derivatives agreement for trading strategies after its initial approval, the ED/CIO, Initial Division User and the new division lead shall agree on the strategy for monitoring for the counterparty.

IV. REBALANCING PROCEDURES

1. Mandatory rebalancing is triggered by the procedures in the Board's WRS Investment Policy and the procedures below, as applicable. The Core Fund and Variable Fund asset mixes will be reviewed at least monthly for potential rebalancing.
2. Discretionary rebalancing may be used to bring public market asset classes partially or fully back to their strategic target weights, to reduce or use active risk, to otherwise minimize asset allocation drift, or to intentionally overweight or underweight an asset or sub-asset class. Discretionary rebalancing will be recommended by the head of ARA and approved by the ED/CIO.

3. In connection with any rebalancing, the ARA Division, in consultation with the LMBI Division as needed, will develop a plan approved by the ED/CIO (a “Rebalancing Plan”) to affect the rebalancing. The Rebalancing Plan will include the total amount of each asset class to be bought and sold, the intended market exposures, and the time frame of purchases and sales. The Rebalancing Plan is based on best estimates of market prices, private market valuations, and benefits cash flows for when the rebalance will take effect. The LMBI Division will assist in the implementation of the Rebalancing Plan. To the extent that the market prices are different at the time of a rebalancing from the anticipated market prices, valuations or cash flows, the Rebalancing Plan may be subsequently adjusted by the ARA Division, in consultation with the LMBI Division, for additional purchases and/or sales to true up the market exposures to the anticipated levels of the original Rebalancing Plan.
4. The LMBI Division, under the supervision of the head of LMBI, has the discretion to authorize and instruct intra-month allocation adjustments of cash and/or exposures across LMBI-managed Core Fund or Variable Fund portfolios. Such adjustments may be used, for example, to optimize exposure implementation, to raise liquidity to fund private markets capital calls, or adjust the overall liquidity position of the fund. Only LMBI portfolios (including unallocated fund-level cash) may be utilized for these adjustments. Any adjustments made in this way shall not have a material impact on the overall asset allocation or active risk of the fund. Aggregate daily portfolio de/allocation shall not exceed \$1 billion notional unless approved by the ED/CIO. The ED/CIO will be notified of any de/allocation in excess of \$100 million notional.
5. The ARA Division, under the supervision of the head of ARA, in consultation with the LMBI Division as needed, has the discretion to approve intra-month allocation adjustments to align portfolio and cash exposures with the approved Rebalancing Plan. Only LMBI portfolios may be utilized for allocations or deallocations. Aggregate daily portfolio allocations or deallocations shall not exceed \$400 million unless approved by the ED/CIO.
6. Exchange-traded and OTC options or other derivatives may be purchased or sold in conjunction with managing asset class exposure and rebalancing. The aggregate notional value of the options will be limited to 2% of the market value of the Core Fund at the date of purchase. The term of options used for this purpose may not exceed one year.
7. Cleared derivatives traded on a swap execution facility (SEF) may only be traded on or pursuant to the rules of the SEFs of which SWIB is a member or participant.
8. In connection with any rebalancing, the following procedures will be followed with respect to the following asset classes:
 - a. The Real Estate Asset Class will rebalance 50% to Public Equities and 50% to Public Fixed Income. Accordingly, in connection with any rebalancing, for any percentage increase in Real Estate there will be a corresponding 50% reduction to Public Equities and a corresponding 50% reduction to Public Fixed Income, and vice versa if the Real Estate assets decrease. The rebalancing does not have to be proportional through the sub-asset classes.

- b. The Private Equity Asset Class will rebalance on a 1 for 1 basis to Public Equities. Accordingly, in connection with any rebalancing, for any percentage increase in Private Equity there will be a corresponding 1% reduction to Public Equities. The rebalancing does not have to be proportional through the sub-asset classes.

V. DRAWDOWN PROCEDURES

1. On an annual basis, the Investment Committee shall approve the active risk budget for the next calendar year and the relative drawdown limits per strategy (based on percentage of assets under management (AUM)) for the Core Fund. The relative drawdowns are measured against the benchmark for each strategy on a monthly basis by the Risk Management Division. Relative drawdown limits are intended to protect the Core Fund from large relative drawdowns. Given the active risk that each strategy is expected to take and achieve, the Investment Committee acknowledges that (1) the relative drawdown limits may be reached in any given market environment, and (2) the probability of reaching the drawdown limits is not remote for the levels of active risk approved in the active risk budget.
2. If and when 60% of the relative drawdown limit is reached during the calendar year for any given strategy, the division head, the strategy head, the head of Risk Management, and the ED/CIO will all meet to discuss the relative drawdown limit, attribution, and outlook for the calendar year. The meeting will be documented by email confirmation sent to the Chief Legal Counsel and the head of Compliance.
3. If and when 90% of the relative drawdown limit is reached during the calendar year for any given strategy, the division head, strategy head, the head of Risk Management, and the ED/CIO will all meet to create a plan to address the drawdown for the strategy. The plan may require the strategy to reduce risk, stay the course until a given set of market conditions exist, make certain trades, and/or provide timing for implementation of the plan. A copy of the plan will be presented to the Investment Committee, generally at the next scheduled meeting.

VI. WRS GENERAL AND PORTFOLIO GUIDELINES – INTERNAL MANAGEMENT

Each internal portfolio is assigned compulsory investment guidelines. Portfolio managers are generally not allowed to deviate from compulsory guidelines. If a deviation from compulsory guidelines occurs or is expected to occur, the staff member who becomes aware of it must immediately notify the head of the Compliance and Risk Management divisions, ED/CIO, and the division head of the asset class in which the deviation occurred. Upon receiving notice of a deviation or potential deviation, the ED/CIO and relevant division head will either take action to correct the deviation or obtain a waiver approved by the ED/CIO. If the ED/CIO is not available, then the waiver may be granted by any division head (other than the division head of the portfolio that is requesting the waiver) and the Deputy Executive Director, in consultation with the head of Risk Management. All waivers will be reported to the Investment Committee and documented in the Investment Committee's meeting minutes.

All internal portfolios are also assigned “soft risk parameters.” Soft risk parameters refer to desired characteristics and/or risk exposures. Portfolio managers are allowed, however, to deviate from soft parameters in pursuit of excess return or efficiency, subject to Investment Committee inquiry, discussion and concurrence of the continued exposure. Soft risk parameters for each portfolio are detailed in *Appendix 2*.

The following general compulsory guidelines (“General Guidelines”) are applicable to all internally managed portfolios. Individual portfolio guidelines appear subsequently.

1. All portfolios must be managed in accordance with the fiduciary standards set forth in section 25.15(2) of the Wisconsin Statutes.
2. Credit quality rating requirements refer to an entire rating level, e.g., “A or better” includes “A-” and better ratings. The lower of split ratings is used. Investment grade securities are those rated “BBB-” or better (or the equivalent rating agency rating). Portfolios may invest in unrated securities, provided that the unrated securities have been assigned an internal SWIB rating by portfolio management staff using similar rating methodologies as the rating agencies.²
3. Fixed income securities backed by the full faith and credit of the U.S. government will be classified as U.S. government securities for purposes of these guidelines.
4. Any sovereign debt obligation (or the issuer in the event the obligation is unrated) in which SWIB invests must be rated “B3/B-” or above, unless otherwise approved in advance by the Investment Committee based on its guidelines for individual business case determinations.
5. Public equity investments in markets designated as “developed” or “emerging” are investments in entities that are incorporated or organized in countries included in the MSCI World Index or the MSCI Emerging Market Index, respectively. Public fixed income investments in markets designated as “emerging” are investments in the debt of countries (or of companies incorporated or organized in countries) included in the JP Morgan Emerging Markets Diversified Index. Public fixed income investments in the debt of countries (or of companies incorporated or organized in countries) not included in the JP Morgan Emerging Markets Diversified Index (other than frontier markets) will be designated as “developed.”
6. The Board approves the benchmarks for the Core Fund and Variable Fund, which are listed in *Appendix 3*. When new benchmarks are approved by the Board or modified by the Board, *Appendix 3* shall be updated without amendment to these IC Guidelines.
7. The Risk Management Division will monitor the risk exposures of all WRS portfolios. The head of Risk Management may recommend modifications to portfolio exposures to manage risk exposures. With the ED/CIO’s concurrence, the manager of a portfolio will make changes as recommended by the head of Risk Management. In addition to such recommendations, drawdown control procedures for all active internal WRS portfolios

² Using ratings models that are reviewed by Risk and Compliance staff.

will be implemented and monitored by the Risk Management Division and adhered to by the portfolios.

8. Portfolios may utilize cash instruments or derivatives in their investment strategy. All investments used will be subjected to the risk analysis and monitoring processes at the portfolio, asset class and fund levels. New derivative and investment instruments will be reviewed with and approved by the Investment Committee prior to implementation.
9. Exposure limits and credit quality exposure limits are to be applied at the time of purchase. Unless otherwise indicated, “value” shall mean market value including un-invested cash.
10. Covered Agency Transactions as defined in FINRA Rule 4210³ may be traded only with a counterparty with which SWIB has a current Master Securities Forward Transaction Agreement (MSFTA), and the settlement of any such transaction shall not be more than 90 days from the date of the trade.
 - a. The counterparty, or its guarantor, must, on each date on which a transaction is initiated, have a credit rating of not less than “Baa2/BBB” on long-term debt from S&P or Moody’s.
 - b. If the counterparty is not rated, then its parent must have such a rating and must guarantee the obligations of the counterparty.
 - c. If a counterparty or its parent is downgraded to a credit rating below “Baa2/BBB” after the initiation of a trade, then trades may be initiated with that same counterparty only to reduce the existing exposure to that downgraded counterparty.
11. Internally managed portfolios, including separately managed funds, are prohibited from investing in commercial paper or other securities issued by SWIB.
12. “Centrally Arranged Leverage” means leverage sourced or provided by the LMBI Division including Temporary Leverage and leverage created by shorting any securities by a portfolio which requires posting of Treasuries, including TIPS, as collateral.
13. “Fixed Income Portfolios” means the internally managed active public fixed income portfolios, including the Investment Grade Credit Portfolio, the Mortgage-Backed Securities Portfolio, the High-Yield Bond Portfolio, the Leveraged Loan Portfolio, and the TBA Strategy Portfolio.

A. Small Cap Portfolio

The Small Cap Portfolio is invested primarily in publicly traded equity securities that are registered with the Securities and Exchange Commission, including common stocks, preferred stocks, ETFs, American Depositary Receipts (ADRs), American Depositary Shares (ADSs), convertible bonds, securities issued in initial public offerings, and when-issued securities. The

³ “Covered Agency Transactions” include certain to-be-announced (TBA) transactions, specified pooled transactions and collateralized mortgage obligations (CMOs).

Small Cap Portfolio may also be invested in equity securities that are publicly traded on stock exchanges in other developed countries, or that are issued through private placements.

1. No more than 5% (long or short) of outstanding shares of any single issuer, excluding shares held in commingled funds and ETFs, may be held.
2. No single issuer's equity securities may represent (long or short) more than the greater of (a) 7% of the total market value of the Small Cap Portfolio, or (b) 5% over the percentage of such issuer's equity securities in the portfolio's benchmark. Shares held in commingled funds and ETFs are excluded from this guideline.
3. Up to 10% of the portfolio's market value may be invested in international and emerging markets companies through common stocks, ADRs, ADSs, or country-specific ETFs.
4. The portfolio may use exchange-traded futures contracts or ETFs to equitize cash and receivables.
5. The portfolio may sell short any securities that may be purchased under applicable guidelines and may then use the proceeds from the short sale to purchase additional approved securities. The total value of the short sales in the portfolio may not exceed 50% of the portfolio's net market value.
6. The portfolio's aggregate ex-ante tracking error will not exceed 10% as measured by SWIB's standard model used at any given time by SWIB's Risk Management Division. If market conditions (compared to active management actions) cause the portfolio's ex-ante tracking error to exceed this limit, then the portfolio will not be deemed to be out of compliance with these guidelines and this guideline will not be deemed to be violated; except that, if the portfolio's ex-ante tracking error exceeds 10% then the portfolio may not trade or take any other action which is predicted to increase the ex-ante tracking error of the portfolio.
7. Except as provided in 3 above, securities must be issued by an entity (a) that is incorporated in the United States or (b) incorporated outside the United States if (1) the company's headquarters are located in the U.S. or (2) the primary exchange for the issuer's securities is located in the U.S. The issuers in (b) shall not count toward the 10% limit in 3 above.
8. The aggregate notional value of long or short puts and calls is limited to 5% of the market value of the portfolio.
9. Gross exposure for the portfolio shall not exceed 205% of the portfolio's market value, and net exposure for the portfolio shall not exceed 105% of the portfolio's market value, in each case unless approved by the ED/CIO.

B. LMBI Passive Internal Portfolios

This guideline section pertains to all internally managed passive investment strategies, unless otherwise separately discussed in other sections. This includes, but is not limited to: passive physical equities, passive U.S. TIPS, passive U.S. Treasuries, synthetic liquidity, synthetic leverage,

and overlay strategies. The objective of the passive portfolios is to closely track the returns and risk of their respective benchmarks.

1. The universe for inclusion in the portfolio shall be the full respective benchmark for each portfolio. Non-benchmark securities may be held from time to time as a result of corporate actions, purchases or sales in advance of expected changes to the benchmark in order to optimize trading costs or to provide synthetic/derivative exposure to the underlying benchmark. Retention of physical non-benchmark securities will only occur if the portfolio manager deems it beneficial to fund (Core Fund/Variable Fund) performance and not significantly detrimental to tracking error. Portfolios that provide liquidity or leverage may hold primarily non-benchmark securities in the form of derivatives that replicate the underlying target beta exposure.
2. Securities offered or sold to U.S. investors pursuant to Regulation D or Rule 144A under the Securities Act of 1933 may be purchased if they are publicly traded on a stock exchange in a developed country.
3. Portfolios may use physical securities or synthetic instruments, including exchange-traded futures contracts, ETFs, swaps, or other Investment Committee-reviewed derivative instruments to equitize cash and receivables, to achieve Policy Leverage within Trustee-approved limits; for liquidity purposes; to replicate beta for the alpha-beta overlay; or for other passive investment strategies. Passive portfolios used to achieve Policy Leverage shall be monitored by the ARA Division so that the Policy Leverage does not exceed Board-approved limits.
4. Portfolios may sell short from time to time as a result of corporate actions, benchmark changes or other similar events. Short positions are also permitted to more closely, more efficiently and/or more cost effectively track the returns and risk of their respective benchmarks if the portfolio manager deems it beneficial to Core Fund/Variable Fund performance and not significantly detrimental to tracking error. Short positions are intended to be used opportunistically to enhance efficient beta management (e.g., transitions or rebalancing), but not solely to increase active risk. The portfolios may short any securities that may be purchased under Guidelines #1-3 and may then use the proceeds from the short sale to purchase additional approved securities.

C. LMBI Passive External Managers

The LMBI Passive External Managers will be comprised primarily of direct or commingled passive investments in strategies of external managers that are intended to generate a beta or SWIB policy benchmark return.

1. Investments in LMBI Passive External Managers will be comprised of the following investment vehicles:
 - a. *Separately Managed Accounts* ("SMAs"): SWIB intends for its portfolio to be comprised primarily of direct investments in various strategies via SMAs, the assets of which would reside at SWIB's custodial bank.

- b. *Commingled Investments or Fund Investments*: Investments can be made in commingled funds or in a Fund-of-One structure where SWIB is the sole investor, the assets of which may not reside at SWIB's custodial bank.
2. Investment Strategies and Broad Guidelines for LMBI External Managers:
 - a. *Equities* –Strategies will be invested in traditional long only portfolios and other public equity securities approaches across various geographies and market cap weights. Derivatives may be used and will be set forth in the individual manager guidelines.
 - b. *Fixed Income* –Strategies will primarily be invested in traditional long only portfolios across the credit quality spectrum, varying geographies, including emerging and frontier market debt, high yield and structured securities. Derivatives may be used and will be set forth in the individual manager guidelines.
 - c. *Levered Strategies* – Strategies that are designed to provide fund-level leverage will be subject to both the external manager guidelines in this section, as well as the applicable Leverage Use Policy guidelines in Section II above. The individual managers will also be subject to any additional guidelines outlined in the investment management agreement with respect to strategy and/or leverage management tool.
3. Approvals: LMBI Passive External Manager allocations are subject to the following approvals:

Investment	Head of LMBI	ED/CIO
New Manager Relationship	Up to \$1.75 billion	More than \$1.75 billion
Additional Allocations to Existing Manager	Up to \$2 billion	More than \$2 billion
Includes all LMBI investments aggregated with the Manager, regardless of vehicle, strategy or portfolio, but excludes allocations to existing strategies managed by existing Managers as part of routine rebalancing activity.		

4. Other guideline limitations notwithstanding, the head of LMBI or other staff authorized by the head of LMBI may modify, amend or waive terms of LMBI Passive External Manager investment management agreements and generally take any and all other actions that are necessary and reasonable to protect, maintain, or enhance the value of SWIB's position in the investments.
5. All redemptions, terminations or reductions of capital will be at the discretion of the head of LMBI for rebalancing, liquidity management, leverage management and/or policy benchmark exposure consideration.

D. LMBI Strategies

The LMBI Division has the authority to engage in the following strategies:

1. Active Cash Strategy

- a. The Active Cash Strategy is an investment strategy of short-term investments.
- b. The Active Cash Strategy Portfolio shall be invested in cash equivalents and short duration (defined as a maturity of 37 months or less) fixed income securities including Treasury bills/notes, commercial paper, corporate notes, certificates of deposit, time deposits, and reverse repurchase agreements.
- c. The strategy weighted average maturity will not exceed one year (the weighted average maturity of floating rate securities is based on interest rate reset dates or earliest call date).
- d. The minimum rating of a security or instrument (or the issuer in the event the security or instrument is unrated) shall be A-2/P-2 or BBB/Baa2.

2. Basis Trades

The LMBI portfolios can implement basis trades by combining long physical assets with short, nearly identical synthetic assets in order to extract a financing spread. The universe of these trades will be limited to U.S. equity indices and Treasuries. The ED/CIO will set the maximum exposure level for these types of trades. Current positions in these trades will be reported to the Investment Committee quarterly.

E. Investment Grade Credit Portfolio

The Investment Grade Credit Portfolio is primarily invested in publicly traded and Rule 144A investment grade corporate bonds or other fixed income instruments, primarily in the United States and other developed markets. Subject to the limitations set forth below, the portfolio may also invest in bank loans, convertible, and equity securities.

1. Maximum single issuer concentration is limited to 8% of the portfolio's market value on a net basis for developed markets investment grade issuers and 3% for all other issuers, in each case, excluding Treasuries, Treasury futures and ETFs.
2. Positions may be purchased long and sold short, and the use of leverage will be incorporated in ex-ante risk assessments and active risk/tracking error contributions. The portfolio may take short exposure by shorting individual securities, including cash bonds and equity securities, utilizing single name CDS and CDX index securities, and shorting ETFs that have been approved by Compliance and included on an approved ETF trading list (including put or call options thereon).
3. Derivatives use is permitted as allowed by the Derivatives Use Policy for the purposes of credit, duration, yield curve exposure, and volatility management. Derivatives use is permitted through the use of (a) exchange-traded and over-the-counter interest rate instruments, including forwards, futures and options, (b) interest rate swaps and swaptions, (c) total return swaps (TRS) with index or underlying basket of permitted instruments, (d) options on permitted ETFs and indices, (e) other volatility derivatives

(including options), (f) credit index swaps (e.g., CDX) and single-name CDS, including options on these instruments, and (g) options on equity securities, indices and ETFs for purposes of tail hedging.

4. Effective duration of the portfolio shall remain within two years of the assigned benchmark's duration.
5. Emerging market (EM) debt investment is limited to securities rated "B-" or above and:
 - a. EM sovereign debt must be of countries in the JP Morgan Emerging Market Bond Index Global Diversified ("JP Morgan EM Bond Index").
 - b. EM corporate debt must be denominated in U.S. Dollars.
 - c. Gross EM debt shall not exceed 15% of the portfolio's market value on a long or short basis (i.e., long % + short %). EM FX forwards used to hedge currency risk will not be counted against the EM debt exposure threshold.
6. Further limits:
 - a. Non-investment grade securities shall not exceed 20% of the portfolio's market value on a gross basis.
 - b. Exposure to bank loans, including CLOs, shall not exceed 15% of the portfolio's market value on a net basis.
 - c. Exposure to convertible securities shall not exceed 10% of the portfolio's market value on a net basis.
 - d. Equity exposure shall not exceed 2% of the portfolio's market value on a net basis.
7. Ex-ante tracking error shall not exceed 2.5% as measured by SWIB's standard model used at any given time by SWIB's Risk Management Division. If market conditions (compared to active management actions) cause the portfolio's ex-ante tracking error to exceed this limit, then the portfolio will not be deemed to be out of compliance with these guidelines and this guideline will not be deemed to be violated; except that, if the portfolio's ex-ante tracking error exceeds 2.5% then the portfolio may not trade or take any other action which is predicted to increase the ex-ante tracking error of the portfolio.
8. Gross exposure for the portfolio shall not exceed 300% of the portfolio's market value, and net exposure for the portfolio shall not exceed 200% of the portfolio's market value, in each case unless approved by the ED/CIO. The portfolio may create leverage through the use of derivatives, securities lending, and repurchase agreement transactions, as well as Centrally Arranged Leverage. Centrally Arranged Leverage in the aggregate across the Fixed Income Portfolios shall not exceed 15% of such portfolios' aggregate market value.

F. Exposure Management Portfolios

Portfolios may be established at the asset class level for multi-asset, public equity and public fixed income asset classes to provide for adjustment and management of the Core Fund and Variable Fund exposures and to utilize or adjust active risk of the Core Fund and Variable Fund. In determining portfolio investments, exposures held in both internally and externally managed

portfolios will be considered. These portfolios may also be used to express investment strategies and ideas where the sizing of the investment requires it to be outside of an individual internal portfolio.

The head of ARA or their designee may approve strategies and/or investment ideas in the portfolios up to an ex-ante contribution to overall Core Fund active risk of 0.20% (excluding investments in PMFA overage portfolios), as measured by SWIB's standard model used at any given time by SWIB's Risk Management Division. If, at the time of investment, the portfolios' ex-ante contribution to active risk exceeds 0.20%, then the strategy and/or investment idea must be approved by the ED/CIO. Portfolio management, oversight and reporting to the Investment Committee will be the responsibility of the ARA Division. Current positions in these trades will be reported to the Investment Committee quarterly. These portfolios may invest in any instrument approved for the relevant asset class portfolios described elsewhere in these guidelines. The portfolios may use derivative instruments. Portfolios will not have a separate benchmark or risk target, but will be included within the benchmark and risk parameters for the applicable aggregated asset class. The portfolios may include, for example, investments strategies to adjust aggregate equity beta, the allocations between specific sectors or sub-asset class exposures, currency exposures, volatility exposure, or credit exposure or duration.

G. Multi-Strat Portfolio

1. The Multi-Strat portfolio is authorized to invest in or short any instrument or derivative, subject to guidelines 5 and 6 below and the general guidelines contained herein.
2. Strategies may be managed either by internal investment staff or by an external manager.
3. Leverage and derivatives may be used to implement individual strategies and to adjust the market exposure of the Multi-Strat portfolio.
4. The Multi-Strat portfolio's aggregate ex-ante tracking error will not exceed 21% as measured by SWIB's standard model used at any given time by SWIB's Risk Management Division. If market conditions (compared to active management actions) cause the portfolio's ex-ante tracking error to exceed this limit, then the portfolio will not be deemed to be out of compliance with these guidelines and this guideline will not be deemed to be violated; except that, if the portfolio's ex-ante tracking error exceeds 21% then the portfolio may not trade or take any other action which is predicted to increase the ex-ante tracking error of the portfolio.
5. The ED/CIO and Head of Risk Management must be informed prior to the launch of a new strategy within the Multi-Strat portfolio. New strategies must be reported to the Investment Committee reasonably promptly following the launch.
6. ED/CIO approval, along with notice to the Head of Risk Management, is required prior to the Multi-Strat portfolio investing in an investment instrument or derivative that was previously approved by the Investment Committee for use by other asset class portfolios. Investment in such instruments must be reported reasonably promptly to the Investment Committee. Investment Committee review and approval is required prior to the Multi-

Strat portfolio investing in any new investment instruments or derivatives not previously approved by the Investment Committee for any asset class portfolios.

H. Mortgage-Backed Securities Portfolio

The Mortgage-Backed Securities (MBS) portfolio is primarily invested in Agency-issued mortgage-related securities, including MBS pools, collateralized mortgage obligations (CMOs), credit risk transfer (CRT) securities, as well as other securities in the structured products sector such as TBA MBS, commercial mortgage-backed (CMBS), asset-backed (ABS), and private label mortgage-related securities. It may also invest in other fixed income securities, certain ETFs, and certain derivatives as outlined below.

1. Securities other than agency-issued mortgage-related securities (e.g., pools, CMOs, CRTs), mortgage TBAs, and mortgage ETFs, but otherwise permitted in these portfolio guidelines and with effective duration of greater than one year, may not exceed 25%, in the aggregate, of the portfolio's market value.
2. Effective duration of the portfolio shall remain within two years of the assigned benchmark's duration.
3. Private label MBS may not exceed 10% of the portfolio's market value. Private label mortgage securities backed by borrower collateral other than prime may not exceed 5% of the portfolio's market value.
4. The portfolio may invest long or short in ETFs that invest primarily in U.S. MBS and that have been approved by Compliance and included on an approved trading list (including put or call options thereon).
5. The portfolio's aggregate ex-ante tracking error will not exceed 5% as measured by SWIB's standard model used at any given time by SWIB's Risk Management Division. If market conditions (compared to active management actions) cause the portfolio's ex-ante tracking error to exceed this limit, then the portfolio will not be deemed to be out of compliance with these guidelines and this guideline will not be deemed to be violated; except that, if the portfolio's ex-ante tracking error exceeds 5% then the portfolio may not trade or take any other action which is predicted to increase the ex-ante tracking error of the portfolio.
6. Except for TBA MBS, US Treasuries and ETFs, no single issue may exceed 5% of the portfolio's market value. No single BBB-rated issue may exceed 2% of the portfolio's market value. The average rating of securities covered by these limits will be "Baa2/BBB" or better. No single issue rated below investment grade may exceed 1% of the portfolio's market value. Each tranche of a securitized product is considered a separate issue. Total exposure to issues rated below investment grade may not exceed 20% of the portfolio's market value, in the aggregate.
7. Fixed income securities with an effective duration of one year or less will have an average credit rating of "A" or better. The portfolio may also use repurchase agreements and reverse repurchase agreements for cash management.

8. Derivatives use is permitted as allowed by the Derivatives Use Policy for the purposes of duration, interest rate, yield curve, mortgage and structured products credit, prepayment and volatility management. Derivatives use is permitted through the use of (a) exchange-traded interest rate instruments, including forwards, futures and options, (b) interest rate swaps and swaptions, (c) total return swaps (TRS) with index or underlying basket of permitted instruments, (d) options on permitted ETFs and indices, (e) other volatility derivatives (including options), (f) MBS options, (g) credit index swaps (e.g., CMBX, CDX and similar instruments) and options, and (h) options on equity indices and ETFs for purposes of tail hedging.
9. All instruments permitted in these guidelines may be traded long or short. Excluding the TBA Strategy, gross exposure for the portfolio shall not exceed 300% of the portfolio's market value, and net exposure for the portfolio shall not exceed 200% of the portfolio's market value, in each case unless approved by the ED/CIO. The portfolio may create leverage through the use of derivatives, securities lending, and repurchase agreement transactions, as well as Centrally Arranged Leverage. Centrally Arranged Leverage in the aggregate across the Fixed Income Portfolios shall not exceed 15% of such portfolios' aggregate market value.
10. CLOs collateralized by corporate bank loans may not exceed 15% of the portfolio's market value.

I. High-Yield Bond Portfolio

The High-Yield Bond Portfolio is eligible to invest in any instruments included in the assigned benchmark — primarily U.S. dollar denominated publicly-traded and Rule 144A high-yield corporate bonds or other fixed income instruments rated between BB+/Ba1 and B-/B3. Subject to the limitations set forth below, the portfolio may also invest in non-U.S. dollar denominated bonds of issuers located outside of the United States, as well as convertible, preferred securities and equity securities.

1. The portfolio shall maintain at minimum a weighted average rating of B-. Subject to the foregoing, the portfolio may hold fixed income instruments rated below B-/B3.
2. Effective duration of the portfolio shall remain within +/- five years of the assigned benchmark's effective duration.
3. Positions may be purchased long and sold short, and the use of leverage will be incorporated in ex-ante risk assessments and active risk/tracking error contributions. The portfolio may take short exposure by shorting individual securities, cash bonds, buying single name CDS, shorting the CDX index, shorting high-yield and equity ETFs that have been approved by Compliance and included on an approved ETF trading list (including put or call options thereon), as well as shorting the underlying equity of a leveraged issuer.
4. Instruments not included in the benchmark, but otherwise permitted in these portfolio guidelines, may not exceed 25% of the portfolio's market value on a long or short basis (i.e., long % + short %). For the avoidance of doubt, any instrument that is subsequently removed from the portfolio's benchmark due solely to the instrument's maturity falling

below the benchmark's stated thresholds shall not be deemed to be out of benchmark for purposes of the 25% limitation described in this Guideline #4.

5. Maximum single issuer active concentration is limited to 5%, excluding Treasuries, Treasury futures and holdings of ETFs, of the portfolio's market value on a net basis.
6. Gross exposure to non-U.S. Dollar denominated instruments shall not exceed 10% of the portfolio's market value on a long or short basis (i.e., long % + short %).
7. Gross exposure to emerging market corporate debt is limited to (a) securities that are rated "B-/B3" or above and (b) issuers incorporated or organized in countries included in the JP Morgan Emerging Markets Diversified Index, and in aggregate shall not exceed 5% of the portfolio's market value on a net basis.
8. Exposure to any single industry sector shall remain within 20% of the assigned benchmark's industry sector weighting on a net basis.
9. Exposure to high-yield bank loans shall not exceed 10% of the portfolio's market value on a net basis.
10. Ex-ante tracking error shall not exceed 5% as measured by SWIB's standard model used at any given time by SWIB's Risk Management Division. If market conditions (compared to active management actions) cause the portfolio's ex-ante tracking error to exceed this limit, then the portfolio will not be deemed to be out of compliance with these guidelines and this guideline will not be deemed to be violated; except that, if the portfolio's ex-ante tracking error exceeds 5% then the portfolio may not trade or take any other action which is predicted to increase the ex-ante tracking error of the portfolio.
11. Derivatives use is permitted as allowed by the Derivatives Use Policy for the purposes of duration, yield curve exposure, and volatility management. Derivatives use is permitted through the use of (a) exchange-traded and over-the-counter interest rate instruments, including forwards, futures and options, (b) interest rate swaps and swaptions, (c) total return swaps (TRS) with index or underlying basket of permitted instruments, (d) options on permitted ETFs and indices, (e) other volatility derivatives (including options), (f) credit index swaps (e.g., CDX) and single-name CDS, including options on these instruments, and (g) options on equity securities, indices and ETFs for purposes of tail hedging.
12. Gross exposure for the portfolio shall not exceed 300% of the portfolio's market value, and net exposure for the portfolio shall not exceed 200% of the portfolio's market value, in each case unless approved by the ED/CIO. The portfolio may create leverage through the use of derivatives, securities lending, and repurchase agreement transactions, as well as Centrally Arranged Leverage. Centrally Arranged Leverage in the aggregate across the Fixed Income Portfolios shall not exceed 15% of such portfolios' aggregate market value.
13. The portfolio may invest in debt instruments and loans and may include senior financing, subordinated or mezzanine financing, and "bridge" financing. Debt instruments and loans may be syndicated or privately issued credit. Debt instruments and loans may be of public or private company issuers. Strategies may include, without limitation, specialty and alternative credit opportunities, distressed and opportunistic strategies, or dislocated

credit opportunities. Debt instruments and loans may include credit opportunities alongside SWIB external managers. In the aggregate, exposure to special or alternative opportunity financings described in this guideline shall not exceed 5% of the portfolio.

J. Leveraged Loan Portfolio

The Leveraged Loan Portfolio is eligible to invest in any instruments included in the assigned benchmark — primarily U.S. dollar denominated publicly-traded and senior secured syndicated leveraged loans. Subject to the limitations set forth below, the portfolio may also invest in non-U.S. dollar denominated loans and/or bonds of issuers located outside of the United States, as well as collateralized loan obligations (CLOs), derivatives, convertible, preferred securities and equity securities.

1. No less than 75% of the portfolio's market value can be invested in single-name first-lien bank loans, total return swaps on first-lien bank loans and first-lien bank loan indices, and/or ETFs with a diversified portfolio of first-lien bank loans, in aggregate.
2. The portfolio shall maintain at minimum a weighted average rating of B. Subject to the foregoing, the portfolio may hold fixed income instruments rated below B-/B3 as well as unrated securities, provided the unrated securities have been assigned an internal SWIB rating by portfolio management staff using similar rating methodologies as the rating agencies.
3. Positions may be purchased long and sold short, and the use of leverage will be incorporated in ex-ante risk assessments and active risk/tracking error contributions. The portfolio may take short exposure by shorting individual securities, including cash bonds and equity securities, utilizing single name CDS and CDX index securities, and shorting ETFs that have been approved by Compliance and included on an approved ETF trading list (including put or call options thereon).
4. Excluding U.S. Treasuries, total return swaps and CDS on first-lien loans, and Compliance approved ETFs with a diversified portfolio of first-lien bank loans, investments in instruments not included in the broad Morningstar LSTA US Leveraged Loan index, but otherwise permitted in these portfolio guidelines, may not exceed 25% of the portfolio's market value on a long or short basis (i.e., long % + short %).
5. Maximum single issuer active concentration is limited to 5%, excluding Treasuries, Treasury futures and holdings of ETFs, of the portfolio's market value on a net basis.
6. Gross exposure to non-U.S. Dollar denominated instruments shall not exceed 10% in the aggregate of the portfolio's market value on a long or short basis (i.e., long % + short %).
7. Aggregate exposure to second-lien loan instruments is limited to 15% of the portfolio's market value on a long or short basis (i.e., long % + short %), and maximum exposure to a single second-lien loan instrument is limited to 2.5% of the portfolio's market value on a long or short basis (i.e., long % + short %).
8. Ex-ante tracking error shall not exceed 5% as measured by SWIB's standard model used at any given time by SWIB's Risk Management Division. If market conditions (compared

to active management actions) cause the portfolio's ex-ante tracking error to exceed this limit, then the portfolio will not be deemed to be out of compliance with these guidelines and this guideline will not be deemed to be violated; except that, if the portfolio's ex-ante tracking error exceeds 5% then the portfolio may not trade or take any other action which is predicted to increase the ex-ante tracking error of the portfolio.

9. Derivatives use is permitted as allowed by the Derivatives Use Policy for the purposes of duration, yield curve exposure, and volatility management. Derivatives use is permitted through the use of (a) exchange-traded and over-the-counter interest rate instruments, including forwards, futures and options, (b) interest rate swaps and swaptions, (c) total return swaps (TRS) with index or underlying basket of permitted instruments, (d) options on permitted ETFs and indices, (e) other volatility derivatives (including options), (f) credit index swaps (e.g., CDX) and single-name CDS, including options on these instruments and (g) options on equity securities, indices and ETFs for purposes of tail hedging.
10. Gross exposure for the portfolio shall not exceed 300% of the portfolio's market value, and net exposure for the portfolio shall not exceed 200% of the portfolio's market value, in each case unless approved by the ED/CIO. The portfolio may create leverage through the use of derivatives, securities lending, and repurchase agreement transactions, as well as Centrally Arranged Leverage. Centrally Arranged Leverage in the aggregate across the Fixed Income Portfolios shall not exceed 15% of such portfolios' aggregate market value.
11. Leveraged loans may include senior financing, subordinated or mezzanine financing, and "bridge" financing. Loans may be syndicated or private credit loans. Loans may be of public or private company issuers. Strategies may include, without limitation, specialty and alternative credit opportunities, distressed and opportunistic strategies, or dislocated credit opportunities. Loans may include credit opportunities alongside SWIB external managers. In the aggregate, exposure to special or alternative opportunity financings described in this guideline shall not exceed 5% of the portfolio.

K. TBA Strategy Portfolio

The TBA Strategy portfolio is invested primarily in Agency TBA mortgages, as well as Agency MBS pools. It may also invest in ABS, CMBS and other fixed income securities and certain derivatives as outlined below.

1. The portfolio's aggregate ex-ante tracking error will not exceed 25% as measured by SWIB's standard model used at any given time by SWIB's Risk Management Division. If market conditions (compared to active management actions) cause the portfolio's ex-ante tracking error to exceed this limit, then the portfolio will not be deemed to be out of compliance with these guidelines and this guideline will not be deemed to be violated; except that, if the portfolio's ex-ante tracking error exceeds 25% then the portfolio may not trade or take any other action which is predicted to increase the ex-ante tracking error of the portfolio.
2. Derivatives use is permitted as allowed by the Derivatives Use Policy for the purposes of yield curve, mortgage, credit, and volatility management. Derivatives use is permitted through the use of (a) exchange-traded interest rate instruments, including forwards,

futures, and options, (b) interest rate swaps and swaptions, (c) volatility derivatives (including options), (d) CDX, and (e) MBS options.

3. The portfolio may invest long and short in any permitted security as described herein.
4. In the event of an Agency MBS trade failure, the head of strategy or designee will promptly notify Risk Management and Compliance.
5. Except for TBA and Agency pass-through MBS, and US Treasuries, no single issue may exceed 8% of the portfolio's market value. Other fixed income securities are allowed with an effective duration of five years or less and must be investment grade. The average rating of these securities will be "A" or better. Each tranche of a securitized product is considered a separate issue. The portfolio may also use repurchase agreements and reverse repurchase agreements for cash management.
6. Effective duration of the portfolio, determined on the gross value of the portfolio, shall be within 0.5 years of the portfolio's benchmark.
7. Gross notional exposure of the portfolio shall not exceed \$20 Billion and net notional exposure of the portfolio shall not exceed \$4 Billion, in each case without the approval of the ED/CIO. The portfolio may create leverage through the use of derivatives, securities lending, and repurchase agreement transactions, as well as Centrally Arranged Leverage. Centrally Arranged Leverage in the aggregate across the Fixed Income Portfolios shall not exceed 15% of such portfolios' aggregate market value.

L. General Guidelines specific for Private Markets and Funds Alpha Portfolios

1. The portfolio manager shall be responsible for notifying the ED/CIO of any referrals or significant contacts by or on behalf of SWIB Trustees regarding consideration of an investment opportunity.
2. The Private Markets & Funds Alpha (PMFA) staff shall report to the Trustees all portfolio commitments to non-public investments.
3. Each portfolio manager shall obtain written confirmation from legal counsel (which may be external legal counsel) that documentation has been satisfactorily completed prior to closing of any investment in his or her portfolio that involves negotiated SWIB documentation.
4. Each portfolio manager shall submit to the head of PMFA a written summary of any proposed investment. The head of PMFA will review all such investments to determine that a) the investment falls within the portfolio's investment guidelines, including limits on invested capital, b) the investment is consistent with the portfolio's established strategy, and c) the appropriate due diligence standards are being applied. No such investment may be closed without approval of the head of PMFA or ED/CIO depending upon the nature and amount of the investment as required in the relevant portfolio guidelines. The portfolio manager shall retain responsibility for each investment decision. External managers with delegated investment discretion operate under separate authority. For purposes of this paragraph, "investments" does not include the individual

properties within a Real Estate Equity Portfolio separate account tranche, but does include the tranche that holds such properties.

5. Dollar limitations for commitments to funds or other investments do not apply to incidental and customary contractual reinvestment, indemnity, reserve or similar obligations incorporated into the terms of an investment, provided such obligations are not expected to be material.
6. Private equity and venture capital investments in markets designated as “developed” or “emerging” are investments in countries included in the MSCI World Index or the MSCI Emerging Market Index, respectively. Real estate investments in markets designated as “developed” or “emerging” are investments in properties in countries included in the EPRA/NAREIT Developed Index and the EPRA/NAREIT Emerging Market Index, respectively.
7. Funds or commingled investments shall be considered U.S., non-U.S., “developed” or “emerging” based on their primary strategy and not on a look-through basis to the underlying investments.
8. Exposure limits and credit quality exposure limits are to be applied at the time of purchase. The term “exposure” is defined as the net asset value (which includes co-investments) plus unfunded commitments. “Allocations” are calculated as the current net asset value of any existing investment(s) plus the intended subscription.
9. SWIB staff may determine to engage a consultant to review prospective investments, perform operational due diligence on prospective investments, or otherwise assist staff in the evaluation of investment opportunities and/or managers.

M. Private Debt Portfolio

The overall objective of the Private Debt Portfolio (the “Private Debt Portfolio” includes both the Wisconsin Private Debt Portfolio and the Non-Wisconsin Private Debt Portfolio) is to invest funds of the Core Fund in debt instruments consistent with SWIB’s fiduciary responsibilities that are primarily private loans negotiated by SWIB directly or as part of an investor group that includes banks or other institutional investors. Instruments can be fixed or floating rate. The two portfolios are invested as follows:

- Wisconsin Private Debt Portfolio – This portfolio’s investments will consist of loans or fixed income securities issued by companies or entities that are headquartered in Wisconsin, have existing operations in Wisconsin, or intend to apply the proceeds to new business operations in Wisconsin which contribute to the Wisconsin economy.
- Non-Wisconsin Private Debt Portfolio – This portfolio can invest in loans or fixed income securities issued by companies or entities located in or doing business in the United States.

The Private Debt Portfolio may also include securities sold to SWIB pursuant to Rule 144A or in the public fixed income markets. Investments may be made in fixed income instruments and in instruments with both fixed income and equity features.

1. Investments may carry a rating from a national rating agency, the National Association of Insurance Commissioners (NAIC) or SWIB. Notwithstanding the provisions of the General Guidelines above, the head of Private Debt may make investments that carry a “BBB” or better rating from a national rating agency or the NAIC, provided that if the investment carries only a SWIB rating, it shall be approved by the head of PMFA, regardless of size.
2. Investments may be made in below investment grade instruments provided that such investments do not in the aggregate constitute more than 25% of the Private Debt Portfolio’s par value. Any investment below investment grade requires approval from the head of PMFA.
3. The Private Debt Portfolio’s aggregate issuer limits shall be scaled by quality and a purchase may not cause the Private Debt Portfolio’s exposure to a borrower or issuer to exceed the following limits (at par value):

Rating	Maximum Position
U.S. Gov’t/Agency	No Limit
“AA” or higher	\$100 MILLION
“A”	\$75 MILLION
“BBB”	\$50 MILLION
“BB” or less	\$25 MILLION

4. The Private Debt Portfolio shall maintain at minimum a weighted average rating of “BBB”, where “AAA”=4, “AA”=3, “A”=2, “BBB”=1, and “BB” or less =0.
5. Other guideline limitations notwithstanding, the head of Private Debt or other staff authorized by the head of PMFA may modify or waive terms of investments in the portfolio and generally take any and all other actions that are necessary and reasonable to protect, maintain or enhance the value of SWIB’s position in the investments.

N. Venture Capital Portfolio

The SWIB Venture Capital Portfolio (the “Venture Capital Portfolio” includes both the Wisconsin Venture Capital Portfolio and the Non-Wisconsin Venture Capital Portfolio) consists of venture capital or venture capital-related investments and invests as follows:

- The Non-Wisconsin Venture Capital Portfolio shall make venture capital investments on a global basis in limited partnership or other fund vehicles, strategic partnerships, or in co-investments in venture-backed companies or publicly traded companies that were venture backed.
- The Wisconsin Venture Capital Portfolio shall make venture capital investments in limited partnership or other fund vehicles or strategic partnerships that are either located in Wisconsin and/or which target Wisconsin as a primary market or as co-investments in venture-backed companies or publicly traded companies that were venture backed that are located or have operations in Wisconsin.

1. Any other guidelines notwithstanding, the Venture Capital Portfolio commitments are subject to the following approvals:

Approval By:	Head of PMFA	ED/CIO
• Venture Capital Funds	Up to \$65 million	More than \$65 million
• Venture Capital Co-Investments (excluding funds of one)	Up to \$25 million	More than \$25 million
SWIB ownership equal to or greater than 50% of an individual fund (excluding funds of one and a fund/vehicle through which a co-investment is made)	ED/CIO, provided that notice shall be given to the ED/CIO if ownership of an individual fund (excluding funds of one and a fund/vehicle through which a co-investment is made) is equal to or greater than 33 1/3%	

2. No more than 45% of the Venture Capital Portfolio's exposure may be invested outside of the U.S., without the approval of the ED/CIO. No more than 20% of the Venture Capital Portfolio's exposure may be invested in emerging markets. No more than 5% of the Venture Capital Portfolio's exposure may be invested in co-investments located in emerging markets.
3. Venture capital investments may be made through funds, strategic partnerships, or co-investments. Venture capital co-investments (excluding funds of one) must be made in one of the following ways:
 - (1) alongside a fund with the same sponsor or manager as a fund in which SWIB is or has been an investor,
 - (2) alongside a fund with the same sponsor or manager as a fund on which SWIB is conducting due diligence and is actively evaluating for a prospective commitment, or
 - (3) as approved by the ED/CIO.
4. From time to time, SWIB may consider formation of fund investments where it may participate both as a general partner and as limited partner.
5. Co-investments in the Venture Capital Portfolio may not make up more than 15% of the Venture Capital Portfolio's exposure.
6. Neither the aggregate exposure to any fund manager or sponsor, nor the aggregate amount of investments in any company, may exceed 20% of the Venture Capital Portfolio's exposure without approval of the ED/CIO.

7. No single co-investment (excluding funds of one) shall exceed 10% of the Venture Capital Portfolio's exposure.
8. The Venture Capital Portfolio may make co-investments in public company securities through private placements, including PIPEs, or other offerings. Co-investments in public company securities shall not exceed 10% of the Venture Capital Portfolio's exposure. For purposes of this guideline, public company securities received via a distribution are not counted and are expected to be sold as soon as reasonably practicable.
9. Subject to the approval thresholds and the restrictions above, the head of Venture Capital or other staff authorized by the head of PMFA may modify or waive terms of investments in the portfolio and generally take any and all other actions that are necessary and reasonable to protect, maintain or enhance the value of SWIB's position in the investments.

O. Private Equity Portfolio

The Private Equity Portfolio consists of private equity or private equity-related investments, made on a global basis, in limited partnership or other fund vehicles, strategic partnerships, and co-investments in operating or holding companies.

1. Any other guidelines notwithstanding, all portfolio commitments are subject to the following approvals:

	Head of PMFA	ED/CIO
• Funds or Strategic Partnerships	\$250 million or less	Over \$250 million
• Co-Investments	\$75 million or less	Over \$75 million
SWIB ownership equal to or greater than 50% of an individual fund (excluding funds of one and a fund/vehicle through which a co-investment is made)	ED/CIO, provided that notice shall be given to the ED/CIO if ownership of an individual fund (excluding funds of one and a fund/vehicle through which a co-investment is made) is equal to or greater than 33 1/3%	

2. The Private Equity Portfolio shall not include investments in venture capital funds.
3. Investments may be made through funds, strategic partnerships, or co-investments. Co-investments must be made in one of the following ways:
 - (1) alongside a fund with the same sponsor or manager as a fund in which SWIB is or has been an investor,
 - (2) alongside a fund with the same sponsor or manager as a fund on which SWIB is conducting due diligence and is actively evaluating for a prospective commitment, or
 - (3) as approved by the ED/CIO.

4. Neither the aggregate exposure (including co-investments) to any fund manager or sponsor, nor the aggregate amount of investments in any company, may exceed 10% of the total Private Equity Portfolio's exposure without approval of the ED/CIO.
5. No more than 45% of the Private Equity Portfolio's exposure may be invested outside of the U.S., without the approval of the ED/CIO. No more than 20% of the Private Equity Portfolio may be invested in emerging markets.
6. The Private Equity Portfolio may make co-investments in public company securities through private placements, including PIPEs, or other offerings. Co-investments in public company securities shall not exceed 2% of the Private Equity Portfolio's exposure. For purposes of this guideline, public company securities received via a distribution are not counted and are expected to be sold as soon as reasonably practicable.
7. Other guideline limitations notwithstanding, the head of Private Equity or other staff authorized by the head of PMFA may modify or waive terms of investments in the portfolio and generally take any and all other actions that are necessary and reasonable to protect, maintain or enhance the value of SWIB's position in the investments.

P. Real Estate Equity Portfolio Guidelines

The Real Estate Equity Portfolio contains investments in a broad range of real estate and real estate-related assets, including equity and debt investments, either solely, or through investment vehicles and structures such as public or private Real Estate Investment Trusts (REITs), public or private real estate company securities, limited liability corporations, limited partnerships, joint ventures, separate accounts or co-investment vehicles. Investment guidelines and soft parameters for Real Estate shall be applied, on an invested basis, to the aggregate composition of the Real Estate Equity Portfolio (except that all REIT portfolios shall be included in the aggregate as Core holdings).

All portfolio commitments are subject to the following approvals:

	Head of PMFA	ED/CIO
Commingled Fund	\$250 million or less	Over \$250 million
Core - Separate Account*	\$300 million or less	Over \$300 million
Non-Core – Separate Account*	\$200 million or less	Over \$200 million

*With respect to a separate account tranche, approval is required for the tranche, and not for individual investments within the tranche.

1. Aggregate exposure (including co-investments) to any commingled fund manager or sponsor may not exceed 20% of the Real Estate Equity Portfolio's exposure without approval of the ED/CIO. This limit does not apply to real estate investments for which SWIB has sole discretion to select, retain, and terminate manager(s) and/or advisor(s) without cause.
2. Aggregate direct public REIT and real estate company stock holdings (excluding underlying commingled fund holdings and externally managed REIT Portfolios) may not exceed 15% of

the Real Estate Equity Portfolio's exposure and portfolio investments in any one public REIT or company may not exceed 3% of the Real Estate Equity Portfolio's exposure. SWIB's direct ownership position in any public REIT or company may not exceed 20% of outstanding voting equity, without ED/CIO approval. Any externally managed REIT portfolio(s) will be managed under separate authority, with guidelines set out in the management agreement(s) between SWIB and the selected manager(s).

3. No more than 45% of the Real Estate Equity Portfolio's exposure may be invested outside the U.S., without the approval of the ED/CIO. No more than 20% of the Real Estate Equity Portfolio's exposure may be invested in emerging markets, and no more than 10% of the Real Estate Equity Portfolio's exposure may be invested in separate accounts invested in emerging markets.
4. Other guideline limitations notwithstanding, the head of Real Estate or other staff authorized by the head of PMFA may: modify or waive terms of investments in the portfolio, including without limitation mortgages and leases on real estate in the portfolio; enter into new mortgages and leases; execute deeds and bills of sale; make expenditures for maintenance and improvements; grant easements; hire consultants, service providers, real estate advisors and property managers; and generally take any and all other actions that are necessary and reasonable to protect, maintain or enhance investment value of SWIB's position in the investments.
5. Prior to funding a direct investment (including a property within a separate account tranche) where real property is a material component, the property shall be evaluated for the presence of environmental and code compliance issues. If environmental issues that require action by governmental authorities exist, then funding shall not occur until an adequate remediation program is in place. If code compliance issues exist, then an adequate plan to bring the property into compliance shall be in place.
6. SWIB may not initiate improvement or development of real property owned or controlled by SWIB without making provisions for compliance with applicable Federal, state and local codes and ordinances.

Q. Current Return Portfolio

The Current Return Portfolio consists of current return or certain equity-related investments, made on a global basis, in limited partnership or other fund vehicles, strategic partnerships, and co-investments in operating or holding companies. Investments may be made in debt instruments and in instruments with both current pay and equity features.

1. Any other guidelines notwithstanding, all portfolio commitments are subject to the following approvals:

	Head of PMFA	ED/CIO
• Funds or Strategic Partnerships	\$250 million or less	Over \$250 million
• Co-Investments	\$75 million or less	Over \$75 million

SWIB ownership equal to or greater than 50% of an individual fund (excluding funds of one and a fund/vehicle through which a co-investment is made)	ED/CIO, provided that notice shall be given to the ED/CIO if ownership of an individual fund (excluding funds of one and a fund/vehicle through which a co-investment is made) is equal to or greater than 33 1/3%
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2. Investments may be made through funds, strategic partnerships, or co-investments. Co-investments must be made in one of the following ways:
 - (1) alongside a fund with the same sponsor or manager as a fund in which SWIB is or has been an investor;
 - (2) alongside a fund with the same sponsor or manager as a fund on which SWIB is conducting due diligence and is actively evaluating for a prospective commitment; or
 - (3) as approved by the ED/CIO.
3. Neither the aggregate exposure (including co-investments) to any fund manager or sponsor, nor the aggregate amount of investments in any company, may exceed 25% of the Current Return Portfolio's exposure without approval of the ED/CIO.
4. No more than 45% of the Current Return Portfolio's exposure may be invested outside of the U.S., without the approval of the ED/CIO. No more than 20% of the Current Return Portfolio may be invested in emerging markets.
5. The Current Return Portfolio may make co-investments in public company securities through private placements or other offerings. Co-investments in public company securities shall not exceed 2% of the Current Return Portfolio's exposure. For purposes of this guideline, public company securities received via a distribution are not counted and are expected to be sold as soon as reasonably practicable.
6. Other guideline limitations notwithstanding, the head of Private Equity or other staff authorized by the head of PMFA may modify or waive terms of investments in the portfolio and generally take any and all other actions that are necessary and reasonable to protect, maintain or enhance the value of SWIB's position in the investments.

R. Hedge Fund Portfolio

The Hedge Fund Portfolio ("HF Portfolio") will be comprised primarily of direct investments in hedge funds and is intended to generate a low-beta, alpha-oriented return stream.

1. The HF Portfolio will be comprised of the following investment vehicles:
 - a. *Direct Investments or Fund-of-Funds*: SWIB intends for its portfolio to be comprised primarily of direct investments in hedge funds rather than fund-of-funds vehicles that use an intermediary investment advisor(s) to select and allocate to hedge funds through a commingled fund. SWIB may make investments in fund-of-fund vehicles, as may be deemed appropriate by Funds Alpha staff and otherwise approved hereunder.

- b. *Hedge Funds or Separately Managed Accounts* (“SMAs”): Investments can be made in limited liability partnerships with other investors or, in some cases depending upon the manager and size of investment, in separately managed accounts. SWIB expects most investments will be in limited liability vehicles. SWIB may invest via SMAs if it is in the best interest of SWIB to do so.

2. Hedge Fund Investment Strategies:

- a. *Relative Value* – strategies that seek to take advantage of price differentials by buying and selling different yet related securities. Relative value strategies include, but are not limited to, fixed income arbitrage, insurance linked, quantitative strategies, merger arbitrage, convertible arbitrage, and volatility-related investments.
- b. *Credit* - long/short and event driven investment strategies to various fixed-income instruments including bank loans, corporate, government bonds, distressed debt, and securitized credit.
- c. *Equity Long/Short* – long and short investments in publicly traded stocks and related securities either on a discretionary or systematic basis.
- d. *Tactical Trading* – global investments in indexes, commodities, interest rates, and currencies and, in each case, their derivatives as a result of relative value or directional forecasts from a systematic or discretionary approach.
- e. *Multi-Strategy* – funds seek to maximize risk-adjusted returns by investing in a variety of underlying investment strategies. They often employ flexibility in terms of capital, aiming to allocate dynamically to the best opportunities and shifting resources to where they are most needed.
- f. *Specialty Finance* - broad collection of lending strategies which typically have private, customized structures with a front ended cash flow profile at the portfolio level, short duration, and asset backed collateral.
- g. *Special Opportunity Investments & Coinvests*– SWIB may invest a portion of its portfolio in special opportunity investments, which may include: interests in the equity or revenues of hedge fund managers, co-investments, or external manager “best ideas” opportunities.

The HF Portfolio has the following target weightings and ranges to the individual hedge fund strategies:

	<u>Target Allocation</u>	<u>Target Maximum</u>
Relative Value	20%	40%
Credit	10%	30%
Equity Long/Short	20%	30%

Tactical Trading	10%	30%
Multi-strategy	25%	50%
Specialty Finance	10%	15%
Special Opportunity Investments	<u>5%</u>	15%
	100%	

3. Approvals: HF Portfolio allocations are subject to the following approvals:

	Head of PMFA	ED/CIO
• Core	Up to \$300 million aggregated	More than \$300 million
• Special Opp/ Co-invest	Up to \$75 million aggregated	More than \$75 million
SWIB ownership equal to or greater than 50% of an individual fund, calculated at the master fund level (excluding funds of one and a fund/vehicle through which a co-investment is made)	ED/CIO, provided that notice shall be given to the ED/CIO if ownership of an individual fund (excluding funds of one and a fund/vehicle through which a co-investment is made) is equal to or greater than 33 1/3%	

4. The aggregate exposure to any hedge fund manager or sponsor (including co-investments) may not exceed 15% of the total HF Portfolio's exposure without approval of the ED/CIO.
5. Other guideline limitations notwithstanding, the head of Funds Alpha or other staff authorized by the head of PMFA may modify or waive terms of investments in the portfolio and generally take any and all other actions that are necessary and reasonable to protect, maintain, or enhance the value of SWIB's position in the investments.
6. All redemptions, terminations or reductions of capital will be at the discretion of the Funds Alpha Manager and the head of PMFA.

S. Beta One Portfolio

The Beta One Portfolio is comprised primarily of direct investments in strategies of external managers that are intended to generate both (1) the total return (or beta of one) of a SWIB policy benchmark and (2) an excess return (or alpha) over the benchmark through active security selection. Tracking error measures divergence around the given benchmark. In comparison, SWIB's external hedge fund portfolio is designed to deliver only an excess return or alpha. This section does not govern passive external managers which the Asset and Risk Allocation Division oversees and monitors.

1. Investments in Beta One External Managers will be comprised of the following investment vehicles:
 - a. *Separately Managed Accounts ("SMAs")*: in which external managers direct positioning but the assets reside at SWIB's custodial bank.
 - b. *Commingled Investments or Fund Investments*: in which SWIB has a percentage ownership in limited liability partnerships or other structures alongside other investors or in a fund-of-one structure where SWIB is the sole investor. Assets reside at the manager's custodial bank.
2. Investment Strategies and Broad Guidelines for Beta One External Managers:
 - a. *Equities* – strategies will be comprised of various fundamental, quantitative and other approaches intended to produce an active return above the respective benchmarks. Strategies will be invested in traditional long only portfolios, active extension formats (i.e. 130/30, 150/50) and other public equity securities approaches across various styles, geographies and market cap weights. A limited use of shorting (up to 80%) may be used in the active extension format in non-SMAs.
 - b. *Fixed Income* – strategies will be comprised of various fundamental, quantitative, and other approaches intended to produce an active return above the respective benchmarks. Strategies will primarily be invested in portfolios across the credit quality spectrum, across geographies, including emerging and frontier market debt, across structures (e.g., asset-backed securities, corporate debentures, etc.) Individual manager guidelines may allow shorting of cash bonds. Derivatives may be used (long or short) for both hedging and investment purposes and will be set forth in the individual manager guidelines.
 - c. Notwithstanding any shorting permitted in (a) above, pursuant to SWIB's policies, the investment guidelines for SMAs will prohibit the Beta One External Managers from shorting any equity securities and from purchasing equity securities in secondary offerings.
3. Any use of derivatives, leverage, and shorting allowed will be incorporated into the ex-ante risk assessments and active risk contributions.
4. Approvals: Beta One External Manager allocations are subject to the following approvals:

Investment	Head of PMFA	ED/CIO
Beta One Fixed Income	Up to \$1.8 billion	More than \$1.8 billion
Beta One Equity	Up to \$1 billion	More than \$1 billion
Includes all Funds Alpha investments aggregated with the Manager, regardless of vehicle, strategy or portfolio.		

5. Other guideline limitations notwithstanding, the head of Funds Alpha or other staff authorized by the head of PMFA may modify, amend or waive terms of Beta One Manager investment management agreements and generally take any and all other actions that are necessary and reasonable to protect, maintain, or enhance the value of SWIB's position in the investments.
6. All redemptions, terminations or reductions of capital will be at the discretion of the head of Funds Alpha and the head of PMFA in consultation with the head of ARA for policy benchmark exposure consideration.
7. Notwithstanding the above discretion regarding redemptions, terminations or reductions, if the Risk Management Division determines that certain risk attributes in the context of the total Core Fund or the aggregate Beta One Portfolio are undesirable for the Core Fund, Variable Fund or the aggregate portfolio, then the head of Risk Management may recommend redemptions, terminations or reductions to portfolio exposures. With the ED/CIO's concurrence, the head of Funds Alpha will make the changes as recommended by the head of Risk Management.

T. Private Markets and Funds Alpha Overage Portfolios

Portfolios may be established at the asset class level for private equity, co-investment, real estate, venture capital, hedge fund, and private debt asset classes to provide for (i) excess exposure to certain investment ideas where the sizing of the investment requires it to be held, in part, outside of an individual internal portfolio or (ii) hedging transactions using public or private securities. In each case, a primary investment must be made by the relevant private markets or hedge fund portfolio with the excess exposure or hedging transaction being allocated to an overage portfolio. The relevant PMFA strategy head will be responsible for portfolio oversight and monitoring of the investment, including the securities in the overage portfolio.

These portfolios may also be used to express investment strategies and ideas that do not fit clearly in any of the private markets or Funds Alpha portfolios but are attractive from a risk/return perspective. In such cases, no primary investment will be made in the existing private markets portfolios, and the ED/CIO will designate a portfolio manager that will be responsible for portfolio oversight and monitoring.

These portfolios may invest in (1) any instrument approved for the relevant private markets asset class portfolios described elsewhere in these guidelines, and (2) any other public or private securities or derivatives approved for trading by SWIB solely for hedging purposes. Each investment idea expressed in the portfolios shall be approved by the ED/CIO with the recommendation of the head of PMFA. The ARA Division is responsible for reporting on any approved investment to the Investment Committee on a monthly basis. Other governance, monitoring, compliance or reporting for the investment may also be specified in the approval. Portfolios will not have a separate benchmark or risk target, but will be included within the benchmark and soft risk parameters for the applicable aggregated asset class, portfolio, or Core Fund, as applicable and as approved at the time of the investment. If the investment will use active risk assigned to exposure management, it will be noted in the investment approval.

VII. EXTERNAL MANAGEMENT

Portfolios may be managed internally by SWIB investment professionals or externally by money management firms. In making the decision on how the portfolios will be managed, SWIB compares the resources, expertise, diversification benefits, and cost of internal management versus external management. If the decision is made to manage the portfolios externally, SWIB will determine whether a separate account or commingled fund best suits SWIB's needs.

External active and passive managers operate under contractual investment guidelines approved by SWIB's investment management staff.

APPENDIX 1 - APPROVED EXCHANGES

Approved Exchanges for Derivatives Trading as of September 23, 2025*

Australian Securities Exchange (ASX)
BOX Exchange
CBOE Exchanges
CME Group Exchanges
London Stock Exchange
Eurex Exchanges
Euronext Exchanges
ICE Futures Exchanges
Japan Exchange Group
Nasdaq Exchanges
NYSE Exchanges
TMX Group

*Approved exchanges shall include any and all exchanges that may be acquired by, merged with or otherwise reorganized with or into, or any subset of, any of the above-listed exchanges subsequent to the date above provided that such exchange continues to clear through a Qualifying Central Counterparty (QCCP). This list may be updated for such organizational or name changes from time to time by Legal & Compliance without any additional action of the Investment Committee, and all additions or changes shall be deemed Approved Exchanges for purposes of the WRS Investment Committee Investment Guidelines effective as of the date of such acquisition, merger or reorganization. Periodically, Compliance shall provide notice to the Investment Committee if there have been any such changes to the list.

The Multi-Strat and Exposure Management Portfolios are approved to trade on any of the above exchanges and any other exchange whose clearing house is a Qualifying Central Counterparty (QCCP) as defined by the Bank for International Settlement (BIS).

APPENDIX 2 - SOFT RISK PARAMETERS

SOFT RISK PARAMETERS – ASSET CLASS AND PORTFOLIO

PORTFOLIO ASSET CLASS CHARACTERISTIC	ASSET CLASS	DISCUSSION TRIGGER
Asset Class Exposure*	Core Fund	
	Global Equities	Target $\pm$ 4.6%
	EM Equities	Target $\pm$ 2.8%
	Small Cap	Target $\pm$ 4.9%
	EAFE Small Cap	Target $\pm$ 4.3%
	U.S. Inv Grade	Target $\pm$ 4.8%
	High Yield and Levered Loans	Target $\pm$ 5.1%
	EM Debt	Target $\pm$ 5.6%
	Variable Fund	
	U.S. Equity	Target $\pm$ 5.0%
	Int'l Equity	Target $\pm$ 5.0%
*Post-Corridor Treatment		
Maximum Small Cap Exposure	CTF Domestic Public Equities	2.75x Benchmark
	VTF Domestic Public Equities	2.75x Benchmark
Ex Ante Tracking Error	Public Equities	0.75% - 2.25%
	Public Fixed	0.4% - 1.2%
	Core Fund	0.6% - 1.8%
	Variable Fund	0.0% - 0.9%
Counterparty Exposure (internal and external separate account portfolios)	WRS (Core and Variable Funds)	5 bp exposure (net of collateral, if any) to a single counterparty
Duration	Public Fixed	+/- 1 year of Benchmark

ACTIVE/INDEXED EQUITIES

Minimum Number of Holdings

Small Cap 100 Long

Ex Ante Tracking Error

Passives (Core Fund and Variable Fund Consolidation):

MSCI US	10 bp annualized
MSCI ex US	20 bp annualized
MSCI US Small Cap	30 bp annualized
Small Cap	2% - 6%

Maximum EM Active Risk Exposure

Small Cap Emerging Markets Tracking Error Contribution of 20%

Maximum Convertible Bond Issues

Small Cap 0

Maximum Private Placements

Small Cap 0

Single Name Concentration

Small Cap Benchmark weight $\pm$ 2%

Maximum ETF Exposure

Small Cap 15% of portfolio value

Maximum Company Ownership
(Excluding ETFs) (L/S)

Small Cap 3% of outstanding

Sum of Top Ten Holdings (L/S)
(Active Weight)

Small Cap 10% of portfolio value

P/E Ratio

Small Cap 50%-150% of Benchmark

Maximum Sector Exposure

Small Cap Benchmark weight $\pm$ 10%

Maximum Cash

Passives 1% in unequitized cash

Small Cap 5%

FIXED INCOME

Duration	IG Credit	+/- 1 year of assigned Benchmark
	MBS	+/- 1 year of assigned Benchmark
	High Yield	+/- 2 years of assigned Benchmark
Maximum Corporate Industry Sector Exposure	IG Credit	Greater of 10% or 3 x Benchmark
Ex Ante Tracking Error	IG Credit	1.5%
	MBS	3.0%
	High Yield	3.0%
	Lev Loans	3.0%
Maximum Equity Exposure	TBA Strategy	15%
	High Yield	5% of portfolio value
	Lev Loans	5% of portfolio value
Maximum Centrally Arranged Leverage	Fixed Income Portfolios	9% of aggregate market value

MULTI-STRAT

Ex ante volatility (tracking error) range	Multi-Strat	5% to 14%, measured with a trailing two-year risk sampling period
Ex-Ante Equity Beta		
Ex-Ante Spread Beta	Multi-Strat	Range of -\$750,000,000 to +\$750,000,000 of asset equivalent exposure with a target of zero over a market cycle. This is measured ex ante with a trailing two-year risk sampling period
Ex-Ante Rates Beta		

PRIVATE MARKETS & FUNDS ALPHA

Maximum Co-Investments	Private Equity	30% of core Private Equity Portfolio for Private Equity Co-Investments 30% of Current Return Portfolio for Current Return Co-Investments
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Maximum Co-Investments alongside funds with the same sponsor or manager as a fund on which SWIB was conducting due diligence and actively evaluating for a prospective commitment at the time of co-investment ⁴	Private Equity	5% of core Private Equity Portfolio for Private Equity Co-Investments
		5% of Current Return Portfolio for Current Return Co-Investments
	Venture Capital	5% of Venture Capital Portfolio for Venture Capital Co-Investments
Maximum Venture Capital Exposure	Venture Capital	25% of sum of Private Equity, Current Return, Private Debt and Venture Capital
Maximum Development Risk (Direct Holdings Only)	Real Estate	10%
Maximum Single Property Type Exposure – Quarterly	Real Estate	50%
Minimum Core Holdings (Including REIT portfolios)	Real Estate	50%
Maximum Value Holdings	Real Estate	30%
Maximum Opportunistic Holdings	Real Estate	30%
Maximum Core Portfolio Leverage	Real Estate	50%
Maximum Core Fund/Deal Leverage (Must be non-recourse to SWIB)	Real Estate	65%
Maximum Real Estate Equity Portfolio Leverage	Real Estate	60%
Maximum Holdings with Leverage > 80%	Real Estate	10%
Maximum Debt Holdings	Real Estate	25%
Ex ante volatility (tracking error) Range	Hedge Fund	2.5% to 6.5%, measured with a trailing two-year risk sampling period
	Beta One Equity	0.8% to 2.0%
	Beta One Fixed Income	0.8% to 2.0%
Equity Delta to the S&P 500 Range	Hedge Fund	-0.3 to +0.3 (target of zero) over a market cycle measured ex ante with a trailing two-year risk sampling period

⁴ If SWIB subsequently commits to a limited partnership or other fund vehicle of the sponsor or manager, then such co-investment shall no longer be included for purposes of calculating this soft parameter.

Target Beta Range	Beta One Equity	0.8 to 1.2 (target of 1.0) (CTF + VTF)
	Beta One Fixed Income	0.8 to 1.2 (target of 1.0)
Maximum one-year annual Conditional Value at Risk (CVaR)	Hedge Fund	7% based on trailing two-year risk sampling period
Maximum Hedge Fund Active Risk Contribution	Hedge Fund	6.0 bps of Core Fund active risk
Maximum General Partner/Investment Manager Portfolio Concentration	Hedge Fund	12%
	Beta One	25% (CTF+VTF)

APPENDIX 3 – CTF AND VTF BENCHMARKS
State of Wisconsin Investment Board
Target State Benchmarks 2026¹

Core Trust Fund Benchmark²		
	Current Benchmark	
Public Equity	36% MSCI ACWI Investable Market Index (IMI) ex China + China All Shares Special Weight	- Current and previous benchmark asset classes are weighted by asset class strategic target weights - Current Benchmark updated 4/30/2012 to include Cash, which reflects leverage
Public Fixed Income	27% Fixed Blend of Eight Components ³	
Inflation Sensitive	19% Bloomberg U.S. Treasury Inflation-Linked Bond Index	
Private Equity/Debt	20% Roll-Up of Five Components ⁴	
Real Estate	8% NCREIF Open End Diversified Core Equity (ODCE)	
Cash	(-10%) 3 Month T-Bill Yield + 50bps	
Total	100%	

Variable Trust Fund Benchmark			
	Current Benchmark		
Domestic Equities	70% MSCI USA Investable Market Index		
International Equities	30% MSCI All Country World Index (ACWI) ex US Custom Net Index		
Total	100%		

Note: Roll-Up refers to the market-weighted aggregation of benchmark components or indices, based on SWIB's actual market exposures.

¹ Reflects target weights under the 2026 Asset Allocation implementation plan as of 12/31/2025.

² The major asset class weights are established through the annual asset allocation exercise. Private Equity/Debt weights float between 12% and 28% and Real Estate weights float between 4% and 12%. The Private Equity/Debt excess weights are taken from Public Equities and the Real Estate excess weights are taken 50% from Public Equities and 50% from Public Fixed Income.

³ Public Fixed Income Benchmark: Fixed Blend of Eight Components
28.00% Bloomberg U.S. Treasury Index
24.00% Bloomberg U.S. Credit Index
20.00% ICE BofA BB-B US High Yield Net of Transaction Cost Index
10.00% Morningstar LSTA U.S. Leveraged Loan 100 Index
8.00% Bloomberg Mortgage-Backed Securities Index
5.00% JPM EMBI Global Diversified
5.00% JPM GBI-EM Diversified

⁴ Private Equity/Debt Benchmark: Roll-Up of Five Components
Component One: State Street Private Equity Index (SSPEI) – All Regions
Component Two: SSPEI Venture Capital – U.S. Region
Component Three: Private Equity Legacy (SW050300) Actual Portfolio Returns
Component Four: Bloomberg Duration-Adjusted Baa Corporate plus 20 basis points
Component Five: SSPEI Private Debt – All Regions

Effective 1/1/2010, the tax treatment of the MSCI benchmark updated to a custom net-of-tax benchmark based on SWIB-specific tax treatment.