



D A L L A S
POLICE & FIRE
PENSION SYSTEM



INVESTMENT POLICY STATEMENT

As Amended Through February 13, 2025

INVESTMENT POLICY STATEMENT

Adopted April 14, 2016
As Amended Through February 13, 2025

Table of Contents

Section 1	Introduction and Purpose	1
Section 2	Goals, Objectives, and Constraints	1
Section 3	Ethics, Standards of Conduct, and Fiduciary Responsibility.....	2
Section 4	Core Beliefs and Long-Term Acknowledgements	3
Section 5	Roles and Responsibilities	4
Section 6	Strategic Asset Allocation and Rebalancing.....	10
Section 7	Investment Manager Search, Selection, and Monitoring.....	11
Section 8	Risk Management	15
Section 9	Approval and Effective February 13, 2025.....	16
Appendix A	– Asset Class Descriptions	17
Appendix B	– Strategic Asset Allocation and Rebalancing Ranges.....	20
Appendix C	– Investment Consultant Reporting Requirements.....	21
Appendix D	– Alternative Investments.....	22

INVESTMENT POLICY STATEMENT

Adopted April 14, 2016

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Section 1 Introduction and Purpose

This policy statement shall guide investment of the assets of the Dallas Police and Fire Pension System (DPFP). This Investment Policy Statement (IPS) is issued for the guidance of the Dallas Police and Fire Pension System Board of Trustees (Board), Investment Advisory Committee (IAC), Executive Director, Staff, Consultant(s), Custodian, and Investment Managers. This IPS is intended to set forth an appropriate set of goals and objectives for DPFP. It defines guidelines and governance to assist fiduciaries and Staff in the supervision of the investments of DPFP. The investment program processes and procedures are defined in the various sections of the IPS by:

- A. Stating in a written document DPFP's expectations, objectives, governance and guidelines for the investment of assets;
- B. Setting forth an investment structure for managing the portfolio. This structure includes assigning various asset classes, investment management styles, asset allocation and acceptable ranges that, in total, are expected to produce an appropriate level of overall risk and total investment return over the investment time horizon;
- C. Encouraging effective communications between the Board, IAC, Executive Director, Staff, Consultant(s), Investment Managers and Custodian(s);
- D. Setting forth policy that will consider various factors, including inflation, global economic growth, liquidity and expenses, that will affect the portfolio's short and long-term total expected returns and risk;
- E. Establishing criteria to select and evaluate Investment Managers; and
- F. Complying with applicable fiduciary and due diligence requirements experienced investment professionals would utilize, and with laws, rules and regulations applicable to DPFP, including the provisions of Article 6243a-1 (DPFP Plan).

Section 2 Goals, Objectives, and Constraints

A. Goal

Earn a long-term, net of fees, investment return that, together with contributions, will be sufficient to meet current and future obligations of the plan when due, subject to any legal requirements.

B. Objectives

1. Maintain a diversified asset allocation that seeks to meet the investment return goal while accepting prudent exposure to key investment risks.
2. Meet or exceed the Policy Benchmark¹ over rolling five-year periods.
3. Control and monitor the costs of administering and managing the investments.

¹ The Policy Benchmark represents the return of the investable and non-investable indices as defined in Appendix B, at the target allocation for each asset class.

Section 2 Goals, Objectives, and Constraints (continued)

C. Constraints

1. The Board intends to maintain sufficient liquidity in either cash equivalents or short-term investment grade bonds to meet 18 months of anticipated benefit payments and expenses (net of contributions).
2. DPFP is a tax-exempt entity. Therefore, investments and strategies will be evaluated on a basis that is generally indifferent to taxable status.

Section 3 Ethics, Standards of Conduct, and Fiduciary Responsibility

The following are standards of conduct for the Board, Investment Advisory Committee, Staff, Investment Managers, Consultant(s), and all other investment-related service providers of DPFP.²

- A. Place the interest of DPFP above personal interests.
- B. Act with integrity, competence, diligence, respect, and in an ethical manner.
- C. Use reasonable care, diligence, and exercise independent professional judgment when conducting analysis, making recommendations, and taking actions.
- D. Promote the integrity of and uphold the rules governing DPFP.
- E. Comply with all applicable laws, rules, and regulations of any government agency, regulatory organization, licensing agency, or professional association governing their professional activities.
- F. Adhere to applicable policies relating to ethics, standard of conduct and fiduciary responsibility including the:
 1. Board of Trustees and Employees Ethics and Code of Conduct Policy;
 2. Board of Trustees Governance and Conduct Policy; and the
 3. Contractor's Statement of Ethics.

² These are informed by the CFA Institute and the Center for Fiduciary Studies.

Section 4 Core Beliefs and Long-Term Acknowledgements

This section outlines the core beliefs and long-term acknowledgements for the overall governance of DPFP. These beliefs and acknowledgements will serve as guiding principles in the decision making and implementation of DPFP's investment mandate.

- A.** A well-defined governance structure with clearly delineated responsibilities is critical in achieving consistent, long-term performance objectives.
- B.** The strategic asset allocation determines the risk reward profile of the portfolio and thus drives overall portfolio performance and volatility.
 - 1. Asset allocation has a greater effect on return variability than asset class investment structure or manager selection.
 - 2. It is essential to account for liabilities in setting long-term investment strategy.
 - 3. Rebalancing the portfolio is a key aspect of prudent long-term asset allocation policy.
- C.** Investment costs will be monitored and minimized within the context of maximizing net return. The goal is not low fees, but rather maximum returns, net of fees.
 - 1. The opportunity for active manager risk-adjusted outperformance (alpha) is not uniformly distributed across asset classes or Investment Managers' strategies.
 - 2. Active strategies are preferred when there is strong conviction that they can be expected to add alpha, net of fees.
 - 3. Passive strategies should be considered when appropriate.
 - 4. Management fees will be negotiated when feasible.
- D.** Risk is multifaceted and will be evaluated holistically, incorporating quantitative measures and qualitative assessments.
 - 1. Global investment reduces risk through diversification.
 - 2. Diversification across different risk factors reduces risk.
 - 3. The pattern of returns matters because volatility levels and the sequence of gains and losses can impact funded status.
 - 4. Generating positive investment return requires recognizing and accepting non-diversifiable risk. DPFP will accept a prudent amount of risk to achieve its long-term target returns.

Section 5 Roles and Responsibilities

A. Board of Trustees

The Board of Trustees (Board) has a fiduciary responsibility to ensure prudent management of the plan and compliance with all state and federal laws. Additionally, the Board:

1. Establishes investment objectives consistent with the needs of DPFP and approves the IPS of DPFP;
2. Approves strategic asset allocation targets and ranges, and asset class structures;
3. Prudently hires, monitors, and terminates key investment service providers including: Consultant(s), Investment Managers and Custodian(s);
4. Appoints members to the Investment Advisory Committee (IAC);
5. Reviews investment related expenses;
6. Approves Board travel related to investments; and
7. Reviews the IPS periodically and revises it as needed.

B. Investment Advisory Committee (IAC)

1. IAC Composition, Selection and Criteria
 - a. The requirements and general composition of the IAC are defined by statute.
 - b. The IAC serves at the discretion of the Board of Trustees.
 - c. The IAC is composed of a minimum of three members including at least one current Board member and a majority of outside investment professionals.
 - d. IAC members will serve two-year terms and may be reappointed.
 - e. The Board will appoint members of IAC members by vote.
 - f. One IAC member who is also a member of the Board will function as Chair of the IAC. The Chair shall serve as liaison to the Board and preside over IAC meetings.
 - g. The Board of Trustees may elect to dismiss a member of the IAC for any reason.
2. IAC Roles and Responsibilities
 - a. A key role of the IAC is to ensure that DPFP investments are prudently managed.
 - b. IAC recommendations are not binding on the Board, provided however the Board may in the exercise of its fiduciary discretion grant decision-making authority to the IAC.
 - c. The IAC will advise regarding the search and selection process for investment managers and other matters that the Board may request.
 - d. All investment related agenda materials for the Board will be made available to the IAC.

Section 5 Roles and Responsibilities (continued)

B. Investment Advisory Committee (IAC) (continued)

- e. The IAC Chair will report to the Board regarding IAC activity as well as investment-related concerns and recommendations.
- f. Any IAC member may address the Board to communicate investment related concerns.
- g. IAC members are fiduciaries to DPFP.

3. IAC Meetings

- a. The IAC will meet as needed, but at least quarterly, to discuss the investment program and provide insight and recommendations to the Board, Staff and Consultant.
- b. IAC meetings require a quorum of at least three IAC members, a majority of whom must not be current Trustees.
- c. IAC members shall be provided reasonable notice of upcoming meetings, but this shall not prevent the IAC from meeting on short notice for an urgent item requiring immediate attention.
- d. Board members who are not members of the IAC may attend and participate in IAC meetings. If a quorum of the Board shall be present at an IAC meeting, then the meeting shall comply with the Texas Open Meetings Act. Board members who are not on the IAC will give the Executive Director notice that they wish to attend an IAC meeting at least one week prior to the meeting. Board members who are not on the IAC may attend and observe an IAC meeting but may not participate in IAC deliberations if such Board member or members, together with Board members on the IAC participating in such meeting equals or exceeds the number of non-Board IAC members participating in such meeting. The IAC Chair shall determine which Board members not on the IAC, if any, may participate in such meeting to maintain compliance with the previous sentence.

C. Executive Director

- 1. The Executive Director is authorized to administer the operations and investment activities of DPFP under policy guidance from the Board;
- 2. Is authorized to manage investments approved by the Board including authority to enter into investment agreements and amendments thereto, act with regard to investment governance issues and engagement of advisors as needed, subject to all relevant rules, regulations and statutory guidelines;
- 3. Manages the day to day operations of DPFP;
- 4. Oversees and reports to the Board on investment and due diligence processes and procedures;
- 5. Approves/declines all Staff travel related to investment manager on-site due diligence;
- 6. Approves rebalancing recommendations; and

Section 5 Roles and Responsibilities (continued)

C. Executive Director (continued)

7. Approves Investment Staff recommendations for presentation to the IAC and Board.
8. The Executive Director is a fiduciary to DPFP when exercising discretion in the performance of their duties.

D. Investment Staff

1. The Investment Staff (Staff) has primary responsibility for oversight and management of the investment portfolio. Staff is responsible for investment manager due diligence and recommendations, portfolio implementation consistent with the Board approved asset allocation, and assessment of the Consultant(s);
2. Helps the Board and the IAC to oversee Investment Managers, Consultant(s), Custodian(s), and vendors;
3. Reports to the Executive Director through the Chief Investment Officer;
4. Works closely with the Consultant(s);
5. Notifies the General Consultant in writing of rebalancing needs and recommended implementation;
6. Coordinates the preparation and periodic review of the IPS;
7. Prepares Staff Investment Manager recommendations, submits Staff and Consultant(s) recommendations to Executive Director for review;
8. Monitors all investments, Investment Managers and investment-related vendors;
9. Accounts for and reviews all external management fees and investment expenses; and
10. Notifies all investment fiduciaries to DPFP of their fiduciary obligations.³

E. General Investment Consultant(s)

1. The General Consultant provides independent investment expertise to the Board, IAC, and Staff;
2. Reports to the Board and works closely with Staff;
3. Monitors and reports qualitative and quantitative criteria related to Investment Managers and aggregate portfolio activity and performance;
4. Reviews strategic asset allocation targets, ranges, and benchmarks for asset classes as required by the IPS and recommends improvements to the Board;
5. Documents asset allocation recommendations with asset class performance expectations including standard deviation, expected return and correlations for each asset class used by DPFP;
6. Reviews Asset Class Structures periodically as required by the IPS and recommends improvements to the Board;

³ Verification of this may be through contract, agreement, or annual fiduciary acknowledgement letter.

Section 5 Roles and Responsibilities (continued)

E. General Investment Consultant(s) (continued)

7. Assists in the manager hiring and termination process for all public asset classes including providing background materials, supporting analysis, evaluation factors, modeling and written recommendations;
8. Reviews and monitors existing investment managers supporting General Consultant's ongoing decision on whether to recommend continued engagement of a manager;
9. Documents and delivers to Staff written recommendations on Investment Manager new hire, hold and termination reviews;
10. Recommends benchmark and appropriate asset class and sub-allocation for investment managers;
11. Approves in writing each of Staff's rebalancing recommendations;
12. Monitors the diversification, quality, duration, and risk of holdings as applicable;
13. Assists Staff in negotiation of terms of vendor contracts; and
14. Prepares quarterly investment reports, which include the information outlined in Appendix C.
15. A General Consultant is a fiduciary to DPFP and this responsibility must be acknowledged in writing.

F. Private Markets Consultant

1. Provides independent expertise and advice with respect to Private Markets to the Board, IAC and Staff. Private Markets includes but are not limited to private equity, private credit, private energy, private infrastructure, real estate, natural resources, timber, agriculture, private fund secondary investments, and private equity fund-of-funds;
2. Reports to the Board and works closely with Staff;
3. Provides annual planning which will include annual updates to liquidity analysis and the annual pacing plan, which will outline recommended Private Market commitment levels to maintain vintage year diversification across the program;
4. Provides services including program development, strategy allocation advice, due diligence reviews, operational due diligence, monitoring and manager searches.
5. Prepares quarterly investment performance results for the Private Markets portfolio to the Board and/or the IAC.
6. Assists Staff with fund and manager searches and provides written investment memorandums, including recommendations, and operational due diligence on all potential new private market investments for DPFP;
7. Provides ongoing investment monitoring which may include attendance at fund annual meetings;
8. A Private Markets Consultant is normally a fiduciary to DPFP and this responsibility must be acknowledged in writing. DPFP may engage subject matter advisors that, while acting in DPFP's interest, may not be a contractual or statutory fiduciary to DPFP.

Section 5 Roles and Responsibilities (continued)

G. Investment Managers

1. Public Separate Account Investment Managers

- a. Acknowledge in writing acceptance of the objectives, guidelines, and standards of performance;
- b. Invest the assets of DPFP in accordance with its objectives, guidelines and standards;
- c. Exercise full discretionary authority as to all buy, hold and sell decisions for each security under management, subject to the guidelines established in the Investment Management Agreement or applicable contract;
- d. Send trade confirmations to the Custodian;
- e. Deliver monthly report to Consultant(s)/Staff describing portfolio asset class weights, investment performance, security positions, and transactions;
- f. Vote any proxies in the best economic interest of DPFP;
- g. Adhere to best execution and valuation policies;
- h. Inform Staff and Consultant, as soon as practical, in writing of any breach of investment guidelines, ethics violations or violations of self-dealing;
- i. Inform Staff and Consultant as soon as practical, in writing, of any significant changes in the ownership, organizational structure, financial condition, personnel staffing, or other material changes at the firm;
- j. Conduct a quarterly portfolio review with Staff, detailing adherence to the investment guidelines and overall performance relative to benchmarks; and
- k. Act as a fiduciary to DPFP. All separate account investment managers are fiduciaries to DPFP and this responsibility must be acknowledged in the contract for services.

2. Public Commingled Fund Investment Managers

- a. Provide the objectives, guidelines, and standards of performance of the fund;
- b. Provide a report detailing fund performance and holding on a monthly basis or as agreed by DPFP;
- c. Prices and fair market valuations will be based on reference to liquid markets, or obtained from an independent service provider if the assets held by the fund cannot be reasonably valued by reference to liquid markets;
- d. Vote any proxies in the best economic interest of DPFP;
- e. All active managers will conduct a quarterly portfolio review with Staff, detailing adherence to investment guidelines and overall performance relative to benchmarks; and
- f. Require fiduciary standards that are not unreasonable in light of market terms for similar investments.

Section 5 Roles and Responsibilities (continued)

G. Investment Managers (continued)

3. Private Investment Managers

- a. Provide objectives, strategy guidelines, and standards of performance as evidenced in investment manager, operating, or partnership agreement;
- b. Ensure that financials statements undergo annual audits and that investments are reported at fair market value, as outlined in the Investment Management, Partnership, or Operating Agreement(s);
- c. Communicate to Staff any material changes in the ownership or management of the firm, and or the stability of the organization;
- d. Inform Staff, as soon as practical, in writing of any breach of investment guidelines, ethics violations or violations of self-dealing.

H. Custodian

1. Safe keep and hold all DPFP's assets in the appropriate domestic or international accounts across all asset classes and provide highly secure storage of physical stock certificates and bonds such that there is no risk of loss due to theft, fire, or accident;⁴
2. Maintain separate accounts by legal registration;
3. Arrange for timely execution and settlement of Investment Manager securities transactions made for DPFP;
4. Provide investment accounting statements and regulatory reporting support as book of record for financial reporting;
5. Proactively reconcile transactions and reported values to Investment Manager statements;
6. Provide for receipt and prompt crediting of all dividend, interest and principal payments received as a result of DPFP portfolio holdings or securities lending activities;
7. Monitor income receipts to ensure that income is received when due and institute investigative process to track and correct late or insufficient payments, including reimbursement for any interest lost due to tardiness or shortfall;
8. At the direction of the Staff, expeditiously transfer funds into and out of specified accounts;
9. Manage the portfolio's interest in securities litigation related to any financial losses;
10. Timely collection of income, including tax reclaim;
11. Prompt and accurate administration of corporate actions, including proxy issues; and
12. Manage securities lending if authorized by the Board.

⁴ Electronic transfer records at the Depository Trust Company ("DTC") are preferred.

Section 6 Strategic Asset Allocation and Rebalancing

A. Asset Allocation

1. The strategic asset allocation establishes target weights and rebalancing ranges for each asset class and is designed to achieve the long-term expected return of the Fund within an acceptable risk tolerance while providing liquidity to meet cash flow needs.
2. A formal asset allocation study will be conducted as directed by the Board, but at least every three years.
3. Asset allocation targets will be reviewed annually for reasonableness in relation to significant economic and market changes or to changes to the investment objectives.
4. Asset class descriptions are provided in Appendix A.
5. The approved asset allocation is included in Appendix B.

B. Asset Class Structure

1. An Asset Class Structure will be prepared for any public market asset class with multiple managers.
2. The Asset Class Structure will be a document that establishes the investment manager roles, allocations and ranges, and any implementation considerations for the asset class.
3. Asset Class Structures should emphasize simplicity and cost control, and toward that end will consider passive strategies and employ the minimum number of managers necessary to assure appropriate diversification within each asset class.
4. Asset Class Structures will be reviewed periodically, approximately every two years.
5. Any changes to the Asset Class Structure must be approved by the Board.

C. The Safety Reserve

The allocation to Cash and Short Term Investment Grade Bonds (the “Safety Reserve”) is designed to cover approximately 18 months of projected benefit payments (net of contributions.) The purpose of the Safety Reserve is to serve as the primary source of meeting any liquidity needs, particularly during a prolonged period of investment market stress. The Safety Reserve may be drawn down away from target if deemed prudent by Staff and General Consultant during periods of market stress.

1. Staff will notify the Board if the determination has been made to draw down the Safety Reserve away from target to meet liquidity needs.
2. After the commencement of a draw down period in the Safety Reserve, staff will notify the Board if the determination has been made to restore the Safety Reserve to the target.

D. Rebalancing

1. Investment Returns (gains or losses) and cash flows affect the value of each asset class in the portfolio. These changes will cause the actual allocation to differ from asset allocation targets, which may require rebalancing.
2. It is expected to take multiple years to fully transition from the current exposure in private markets towards the long-term asset allocation.

Section 6 Strategic Asset Allocation and Rebalancing (continued)

D. Rebalancing (continued)

3. Staff shall submit a written rebalancing recommendation to the General Consultant and Executive Director at least annually based on consideration of the entire portfolio, and additionally as soon as practicable when an asset class breaches an established range or when deemed prudent by Staff or General Consultant.
4. Rebalancing will be used to keep asset classes within their defined ranges, to keep underlying strategies consistent with the approved Asset Class Structures and to ensure sufficient assets in the Safety Reserve to meet anticipated cash flows. Rebalancing actions must move asset classes and the underlying strategies within the established ranges.
5. While rebalancing actions will generally move an asset class towards the target, moves away from target may be appropriate given market conditions and volatility, forward-looking cash flows, and liquidity, provided such a move is deemed prudent by Staff and the General Consultant.
6. Rebalancing recommendations should consider expected future cash flows, investment liquidity, market volatility, and costs. Transition management should be considered to minimize transition costs.
7. Staff is responsible for implementing the rebalancing plan following General Consultant and Executive Director written approval.
8. Rebalancing activity shall be reported to the Board and the IAC.

Section 7 Investment Manager Search, Selection, and Monitoring

A. Public Investment Manager Search and Selection

1. The selection of investment managers will utilize a robust process to ensure an open and competitive universe, proper evaluation and due diligence, and selection of candidates that are best able to demonstrate the characteristics sought in a specific search.
2. Investment manager searches shall be based on one or more of the following reasons:
 - a. Changes to the approved asset allocation;
 - b. Changes to the approved Asset Class Structure; or
 - c. Replacement or possible replacement of an investment.
3. Staff and Consultant shall define and document the search process, including evaluation criteria, prior to initiating the search process.
4. The IAC will advise regarding the search, approve the search process document and provide a recommendation to the Board.
5. Each investment manager hiring recommendation shall be supported by a rationale that is consistent with the pre-established evaluation criteria.

Section 7 Investment Manager Search, Selection, and Monitoring (continued)

A. Public Investment Manager Search and Selection (continued)

6. Each hiring recommendation will generally include the following information:
 - a. A description of the investment and the suitability within the relevant asset class;
 - b. A description of the organization and key people;
 - c. A description of the investment process and philosophy;
 - d. A description of historical performance and future expectations;
 - e. The risks inherent in the investment and the manager's approach;
 - f. The proper time horizon for evaluation of results;
 - g. Identification of relevant comparative measures such as benchmarks and/or peer samples; and
 - h. The expected cost of the investment.
7. Inclusion of Diverse Managers in Public Manager Searches
 - a. Over the long term, inclusion of Diverse Managers as part of external investment management is expected to enhance the expected investment performance of DPFP. Such relationships shall exhibit strong alignment of interest with investors and seek to provide DPFP with long-term access to the next generation of investment talent. Staff shall seek to find Diverse Managers that can benefit DPFP by enhancing its risk-adjusted returns, net of expenses.
 - b. On all public active manager searches, staff will request an RFP from at least one Diverse Manager, so long as the firm meets the minimum criteria outlined in the specific search process. To be considered a Diverse Manager, the firm must have economic ownership of more than 50% of any combination of the following groups: female, veteran, disabled and/or minority (non-white).

B. Private Market Manager Selection

1. Annual Planning: Staff and Private Markets Consultant will develop an annual plan for alternative investments in each private markets asset class and present such plans to the Board. The annual plan will include a recommended target for commitment pacing to achieve DPFP's target allocation to the respective private markets asset class over a reasonable time period.
2. Staff and Private Markets Consultant shall conduct extensive due diligence on potential private markets investments and endeavor to select the highest quality managers available to meet DPFP's long term return objectives. Selection of private markets investments will consider but are not limited to the following criteria:
 - a. Quality and stability of the firm and investment team
 - b. Investment track record
 - c. Proposed investment strategy
 - d. Demonstrated capability to generate superior returns

Section 7 Investment Manager Search, Selection, and Monitoring (continued)

B. Private Market Manager Selection (continued)

- e. Operational capabilities
 - f. Alignment of interests
 - g. Legal and economic terms governing the partnership/vehicle
 - h. Portfolio fit
3. Board Approval Process
- a. Staff and Private Markets Consultant will periodically present to the IAC a Pipeline Report that contains a list of investments under consideration in each private markets asset class.
 - b. The IAC chair will designate a sub-committee comprised of a subset of the IAC to review and advise the Board on recommended investments.
 - c. Staff and Private Markets Consultant will provide an overview of recommended investments, including a written recommendation, to the sub-committee.
 - d. Based upon the sub-committee recommendation, Staff will seek Board's approval of investments at the next available Board meeting.
4. Alternative Investments
- The Board has adopted the definition of "Alternative Investments" as outlined in Appendix D, which will be reviewed as part of the due diligence process for any new investment. Pursuant to Section 4.07 of Article 6243a-1, the vote of eight trustees is required to approve any Alternative Investment.

C. Investment Manager Monitoring

- 1. Staff and Consultant(s) are responsible for ongoing monitoring of all Investment Managers using qualitative and quantitative factors as appropriate.
- 2. Staff will strive to conduct a quarterly review call with all actively managed public managers to evaluate relevant qualitative and quantitative factors.
- 3. On an annual basis, Staff and the General Consultant will hold a review of all actively managed investment managers in each asset class.
- 4. Qualitative factors may include, but are not limited to:
 - a. Consistent implementation of philosophy and process;
 - b. Ownership changes or departure of key personnel;
 - c. Assets under management at the firm and product level;
 - d. Conflicts of interest;
 - e. Material litigation or regulatory challenges involving the investment manager;
 - f. Adequate reporting and transparency; and
 - g. Material client-servicing problems.

Section 7 Investment Manager Search, Selection, and Monitoring (continued)

C. Investment Manager Monitoring (continued)

5. Quantitative factors may include, but are not limited to:
 - a. Long-term (3-5 years) performance relative to assigned benchmarks and the relevant peer group;
 - b. Significant large short-term performance variance (over or under); and
 - c. Risk metrics such as volatility, drawdown, and tracking error.
6. Staff and the Consultant(s) will highlight Investment Manager concerns to the IAC and the Board and recommend an appropriate course of action, including further review or termination.
 - a. Manager terminations will include Staff and Consultant written recommendations and require Board approval.
 - b. Terminations can be based on, but not limited to, any of the qualitative and quantitative factors listed above.

D. Investment Fee and Expense Monitoring

1. Staff will review the accuracy of management fees charged by managers, ensuring they are in-line with investment agreements.
2. Payment of fee invoices requires multiple levels of internal approval.
3. In addition to the fees paid directly, DPFP incurs investment management fees which are charged by general partners or investment managers at the fund level. Fees charged at the fund level are typically seen in public equity and fixed income commingled funds or private equity, private debt, and infrastructure funds.
4. DPFP considers any incentive, performance, or disposition fees paid directly to the investment manager as management fees.
5. As required by Texas Government Code Section 802.103, Staff reports all investment management fees, including those paid directly and fund-level fees, brokerage fees, commissions, carried interest and other investment expenses annually in the Annual Comprehensive Financial Report.
6. Fees and expenses will be categorized by both the type of fee and by the Asset Class.

Section 8 Risk Management

Staff will work within the parameters of this Investment Policy Statement to mitigate the risk of capital loss. By implementing this Policy, the Board strives to address:

- A. Custodial Credit Risk for both public and private holdings;⁵
- B. Interest Rate Risk through fixed income duration monitoring;⁶
- C. Issuer Concentration Risk through limits on single issuer exposure in public markets.
 - 1. Public Equity Concentration: Exposure to public equity securities from any individual issuer shall be limited to 5% of the total Public Equity portfolio (Global Equity and Emerging Markets Equity).
 - 2. Fixed Income Concentration: Except for holdings of US government and agency securities, exposure to publicly traded fixed income securities from any individual issuer shall be limited to 5% of the Public Fixed Income portfolio (excludes Private Debt). Convertible bonds will be included in the Fixed Income concentration calculation.
 - 3. Staff will calculate the Public Equity and Public Fixed Income concentration on a quarterly basis and report to the IAC if the concentration from a single issuer exceeds the 5% limit and discuss with the IAC possible courses of action.
- D. Issuer Concentration Risk though limits in private markets
 - 1. DPFP will not commit capital to any direct private market investments or co-investments that are tied to a single company. This restriction does not prevent DPFP from holding direct investments that result from the dissolution of a private market fund.
 - 2. DPFP will not commit capital to any private market fund if such commitment would likely result in DPFP holding greater than a 10% interest in the fund.
 - 3. DPFP will not commit capital to any private market fund if such commitment exceeds 2% of the total market value of the DPFP investment portfolio.
 - 4. DPFP will not commit to any private market fund if the current value plus total unfunded commitments to related funds (e.g. fund family) exceeds 5% of the total market value of the DPFP investment portfolio.
 - 5. The private market commitment limitations outlined above, do not prevent the Board from making contributions necessary to protect DPFP interests.

Furthermore, through this Policy, Staff has established the necessary criteria to monitor the Custodian, Consultant(s), and Investment Managers, such that DPFP controls and manages interest rate, custody, concentration, and credit risks.

⁵ Reference Custodian responsibilities in Section 5.

⁶ Reference IPS Annual Review in Section 5.A.7 of IPS and Investment Manager strategy guidelines reviewed and approved by Staff.

Section 9 Approval and Effective February 13, 2025

The Investment Policy Statement was originally adopted by the Board on April 14, 2016 and was subsequently amended and adopted on the following dates.

December 14, 2017
January 10, 2019
March 14, 2019
February 13, 2020
July 9, 2020
November 12, 2020
March 11, 2021
August 12, 2021
January 13, 2022
February 10, 2022
October 13, 2022
February 9, 2023
October 12, 2023
November 14, 2024

APPROVED and effective on February 13, 2025, by the Board of Trustees of the Dallas Police and Fire Pension System.

/s/ Nicholas A. Merrick

Nicholas A. Merrick
Chairman

ATTEST:

/s/ Kelly Gottschalk

Kelly Gottschalk
Secretary

Appendix A – Asset Class Descriptions

DPFP investment assets are prudently diversified to optimize expected returns and control risks. Assets can generally be categorized into four broad asset categories: Equity, Credit, Real Assets and Fixed Income & Cash.

A. Equity

1. Role: Capital appreciation (growth), primary driver of long-term total return
2. Investment Approach: Generally represent equity or equity-like interests in current and future income streams and capture long-term economic growth trends throughout the world.
3. Risk Factors: The cost of the high expected long-term returns is higher expected volatility. Equity assets are highly sensitive to economic conditions and are subject to potential loss during economic downturns, rising/unexpected inflation, and rising interest rates.
4. Asset Categories
 - a. **Public Equity** represents publicly traded stock holdings of companies across the globe, including emerging markets. Liquidity is a key benefit as stocks can be traded daily. Emerging markets equity is expected to capture the higher economic growth of emerging economies. Foreign currency volatility can be a source of risk and return.
 - b. **Private Equity** refers to investments in private companies (direct investments) or funds that hold investments in private companies or securities that are not typically traded in the public markets. Frequently these investments need “patient” capital to allow time for growth potential to be realized through a combination of capital investment, management initiatives, or market development. Private equity is expected to provide higher long-term returns than global equity, but illiquidity is a key risk as investment contributions may be locked up for several years.

B. Credit

1. Role: Current income, yield and moderate long-term appreciation
2. Investment Approach: Credit assets are generally fixed claims on assets or income streams of an issuer (e.g. government, corporation, asset-backed securities).
3. Risk Factors: The primary risk for Credit assets is the failure of the borrower to make timely payments of interest and principal (credit risk) and the price volatility related to credit risk. Bonds with greater credit risk (i.e., bonds with lower credit ratings) are typically less liquid than higher quality bonds. Illiquidity is a key risk of private credit as the investment vehicles typically lock up investor capital for several years. Credit assets may also be susceptible to interest rate (duration) risk where higher market interest rates reduce their value. Longer maturities have relatively higher interest rate risk.

4. Asset Categories

- a. **Bank Loans** are like high yield bonds in that both represent debt issuers with higher credit risk. Compared to high-yield bonds, bank loans typically have higher seniority in the capital structure, which has historically resulted in much higher recovery following default.
- b. **High Yield Debt** refers to bonds with higher credit risk and lower credit ratings than investment-grade corporate bonds, Treasury bonds and municipal bonds. Because of the higher risk of default, these bonds pay a higher yield than investment grade bonds.
- c. **Emerging Markets Debt (EMD)** refers to bonds issued by developing countries or corporations based in developing countries. EMD bonds can be denominated in U.S. Dollars or local currency. The primary risk factor is credit quality, but interest rates and foreign currency are also factors.
- d. **Private Credit** includes a wide array of strategies spanning the capital structure, borrower types, collateral types and risk types. Various terms are often used interchangeably when referring to Private Credit including (but not limited to): direct lending, non-bank lending, middle market lending, alternative lending, capital solutions. The underlying loans typically do not trade therefore include an illiquidity premium. Investments are typically structured in a closed-end format with limited liquidity.

C. Real Assets

1. Role: Current income, inflation protection, diversification
2. Investment Approach: Generally, ownership in physical assets.
3. Risk Factors: Real Assets may not provide the desired inflation protection. Loss of principal is also a risk. Foreign assets are also subject to currency movements against the U.S. dollar.
4. Asset Categories
 - a. **Real Estate** includes investments in office buildings, apartments, retail, hotels, industrial warehouses, data centers, life science properties, residential housing, manufactured housing, storage, raw land and development projects.
 - b. **Natural Resources** broadly refers to anything mined or collected in raw form but may include assets subject to further processing. Typical assets include permanent and row crops, timber, energy, minerals, metals and other commodities.
 - c. **Infrastructure** refers to investments in physical systems that support world economies. Typical investments include transportation, communication, utilities (electricity, gas, water, sewage).

D. Fixed Income & Cash

1. Role: Liquidity to fund benefit payments and other cash flow needs, capital preservation, modest current income, diversification to growth assets.
2. Investment Approach: Cash equivalents or high-quality domestic and international bonds.
3. Risk Factors: Risks are substantially lower for risk mitigation assets but may include modest exposure to credit or interest rates (duration).
4. Asset Categories
 - a. **Cash Equivalents**
 - b. **Short Term Investment Grade Bonds** have moderate interest rate risk.
 - c. **Investment Grade Bonds** including bonds and notes issued by the U.S Treasury, U.S. Government Agencies, state and local municipalities, corporations, or other issuers with similar conservative risk profiles. Risk factors include duration and credit.

Appendix B – Strategic Asset Allocation and Rebalancing Ranges

Asset Class	Policy Benchmark	Target Weight	Minimum Weight	Maximum Weight
Equity		64%		
Public Equity	MSCI ACWI IMI Net	58%	50%	66%
Private Equity	MSCI ACWI IMI Net + 2% 1Q lag	6%	N/A ¹	N/A ¹
Huff Energy	Actual Return of Fund ²	0%	N/A ¹	N/A ¹
Credit		15%		
Public Credit	35% Bloomberg US HY Index, 35% Credit Suisse Leveraged Loans, 30% Blended EMD Benchmark ³	11%	7%	15%
Private Credit	50% Bloomberg US HY / 50% Credit Suisse Leveraged Loans + 1% 1Q Lag	4%	N/A ¹	N/A ¹
Real Assets		8%		
Real Estate	NCREIF Property Index 1Q Lag	5%	N/A ¹	N/A ¹
Natural Resources	NCREIF Farmland TR Index 1Q Lag	3%	N/A ¹	N/A ¹
Infrastructure	S&P Global Infrastructure ²	0%	N/A ¹	N/A ¹
Fixed Income & Cash		13%		
Cash	91 Day T-Bills	3%	0%	6%
Short Term Investment Grade Bonds	Bloomberg Barclays 1-3 Year U.S. Aggregate TR	6%	0%	9%
Investment Grade Bonds	Bloomberg Barclays U.S. Aggregate TR	4%	2%	6%
Total		100%		

1 - Rebalancing Ranges are not established for illiquid asset classes.

2 – Huff Energy and Infrastructure benchmarks are for purposes of the Allocation Index and are not included in the Policy Index.

3 - Emerging Markets Debt benchmark consists of 35% JPMEMBI Global / 35% JPM CEMBI Broad Diversified / 30% JPM GBI-EM.

Appendix C – Investment Consultant Reporting Requirements

The investment Consultant(s) are required to provide the Board with quarterly investment information for portfolio monitoring purposes. Generally, these are as follows:

General Investment Consultant - Quarterly (due in advance of the meeting)

1. DPFP's actual asset allocation relative to its target asset allocation as defined in Appendix B.
2. DPFP's return relative to its Policy Benchmark return and other public pension funds.
3. DPFP's risk adjusted returns relative to the policy and other public pension funds.
4. Asset class performance relative to the benchmarks as defined in Appendix B.
5. Individual Investment Manager returns relative to their stated benchmark.
6. Report will specifically acknowledge any underperforming Investment Managers.
7. Any reportable events affecting any of DPFP's Investment Managers.

Private Markets Consultant - Quarterly (due in advance of the meeting)

1. Private Markets reports will cover Private Credit, Private Equity, Infrastructure, Natural Resources and Real Estate.
2. Investment performance on an overall program, asset class and individual investment basis which will include net IRR, total value to paid in capital (TVPI), distributions to paid in capital (DPI), public market equivalent (PME), and comparisons to peer, private and public benchmarks.
3. Exposure by region, vintage year, asset class and strategy.

Appendix D – Alternative Investments

Alternative Assets means any investment that is not a Traditional Asset. The DPFP plan defines Alternative Assets as an investment that is not an investment in stocks, bonds or cash, including investments in private equity, private real estate, hedge funds and infrastructure.

Traditional Assets include:

1. Common Stocks: publicly traded securities representing ownership in a corporation; also known as publicly-traded equity. Examples include publicly traded equity shares of public companies, REITs, and ADRs. Regional examples include shares of companies domiciled in the US, non-US developed markets and emerging markets.
2. Bonds: publicly-traded securities, the holders of which serve as creditors to either governmental or corporate entities. Examples include government bonds and corporate bonds, including senior bank loans. Regional examples include US government issued bonds, non-US international developed markets issued bonds, and emerging markets issued bonds. Credit examples include investment grade bonds and non-investment grade bonds (e.g. high yield bonds and bank loans).
3. Cash Equivalents: short-term investments held in lieu of cash and readily convertible into cash within a short time span. Examples include CDs, commercial paper, and Treasury bills.

Though an exhaustive list is not included, some of the defining characteristics of Alternative Assets and their vehicles include:

1. Private ownership vehicles
2. Liquidity-constrained, and a lock-up of capital for extended time periods (one-year or longer)
3. Use of leverage
4. Ability to take short positions
5. Use of derivatives

The Board recognizes that certain investments may have characteristics and underlying securities that could be classified as both a Traditional and Alternative Investment. On any new investment recommendation, Staff and Consultant(s) will propose a categorization for such investment as either Alternative or Traditional based on these criteria, with a focus on liquidity of the investment, for the Board's consideration.

ASSET CLASS STRUCTURE: PUBLIC CREDIT

Board Approval Date: February 13, 2025

Philosophy:

The Public Credit Asset Class Structure is intended to maintain baseline exposure to key credit sectors (bank loans, high yield, and emerging market debt).

The core of the Public Credit portfolio is a multi-asset credit manager that has the discretion and skill to adjust allocations and take advantage of relative value opportunities between sectors. The multi-asset credit exposure is balanced by smaller allocations to dedicated high yield and bank loan managers that add stability to the overall composition of the Public Credit portfolio.

DPFP believes that there is value to having a specialized manager that focuses exclusively on emerging market debt given the expertise required for this asset class.

Asset Class Construction:

DPFP Public Credit will follow the below structure:

Mandate	% of Public Credit*	% of Total Fund	Minimum	Maximum
Bank Loan Manager	18.2%	2%	1%	3%
High Yield Manager	18.2%	2%	1%	3%
Multi-Asset Credit Manager	36.4%	4%	2%	6%
Emerging Market Debt Manager	27.3%	3%	1%	5%
Total Public Credit	100%	11%		

**Percentages may not foot due to rounding.*

Implementation:

Until a multi-asset credit manager is hired by the Board and funded, the 4% multi asset credit allocation will be split evenly between the current bank loan and high yield managers (4% each) to maintain market exposure.

ASSET CLASS STRUCTURE: PUBLIC EQUITY

Board Approval Date: February 13, 2025

Philosophy:

The Public Equity Asset Class Structure seeks to balance active management's ability to generate alpha while reducing risks tied to individual manager performance. A larger allocation to passive indexing reduces costs and increases stability.

The utilization of domestic and international small-cap managers, as well as an emerging market equity manager, is intended to maintain regional, sector, and market cap neutrality relative to the MSCI ACWI IMI benchmark. However, active managers may choose to underweight certain regions or sectors to express their view.

Asset Class Construction:

DPFP Public Equities will follow the structure below. In the event of an extreme situation that requires the prompt termination of an active manager within any of the mandates below, it is expected that a transition manager will be utilized to maintain the intended exposure.

Mandate	% of Public Equity	% of Total Fund	Minimum	Maximum
Active Global Equity Manager 1	10.3%	6%	4%	8%
Active Global Equity Manager 2	10.3%	6%	4%	8%
Active Global Equity Manager 3	10.3%	6%	4%	8%
Active Global Equity Manager 4	10.3%	6%	4%	8%
Passive ACWI IMI Fund	41.4%	24%	16%	30%
Domestic Small Cap Manager	5.2%	3%	1%	5%
Intl. Small Cap Manager	5.2%	3%	1%	5%
EM Equity Manager	7.0%	4%	2%	6%
Total Public Equity	100%	58%		

Implementation:

As DPFP currently maintains a structural underweight in Public Equities relative to its target, due to an overweight position in legacy private markets, this underweight is expected to be reflected in the Passive ACWI IMI allocation until the Public Equity asset class reaches the 58% Asset Allocation target.