

## APPENDIX D

### TREASURY MANAGEMENT PRACTICE (TMP1) – CREDIT AND COUNTERPARTY RISK MANAGEMENT SPECIFIED AND NON-SPECIFIED INVESTMENTS AND LIMITS

**Specified investments** – These investments are sterling investments of not more than one-year maturity, or those which could be for a longer period but where the Council has the right to be repaid within 12 months if it wishes. These are considered low risk assets where the possibility of loss of principal or investment income is small. These would include sterling investments which would not be defined as capital expenditure with:

1. The UK Government (such as the Debt Management Account deposit facility, UK treasury bills or a gilt with less than one year to maturity).
2. Supranational bonds of less than one year's duration.
3. A local authority
4. Pooled investment vehicles (such as money market funds) that have been awarded a high credit rating by a credit rating agency.
5. A body that is considered of a high credit quality (such as a bank or building society)

**Non-specified investments:** These are any investments which do not meet the Specified Investment criteria. **A nil amount will be held in aggregate in non-specified investment.**

A variety of investment instruments will be used, subject to the credit quality of the institution, and depending on the type of investment made it will fall into one of the above categories. The criteria, time limits and monetary limits applying to institutions or investment vehicles are:

	<b>Minimum credit criteria / colour band</b>	<b>Max % of total investments / £ limit per institution</b>	<b>Max. maturity period</b>
DMADF – UK Government	N/A	100%	6 months
Money market funds	AAA	£2 million	Liquid
Local authorities	N/A	£2 million	5 years

Term deposits with banks and building societies	Yellow	£2 million (£3 million for Lloyds Bank)	Up to 5 years
	Purple		Up to 2 years
	Blue		Up to 1 Year
	Orange		Up to 1 Year
	Red		Up to 6 months
	Green		Up to 100 days
	No Colour		Not for use
<b>The Council is not recommending using the following investment vehicles and this is reflected by showing 0% against the limit per institution.</b>			
UK Government gilts	AAA	0%	Yellow (5 years)
UK Government Treasury bills	AAA	0%	6 months
Bonds issued by multilateral development banks	AAA	0%	Yellow ( 5 years)
CDs or corporate bonds with banks and building societies	Yellow	0%	Up to 5 years
	Purple		Up to 2 years
	Blue		Up to 1 year
	Orange		Up to 1 year
	Red		Up to 6 months
	Green		Up to 100 days
	No colour		Not for use

## SPECIFIED INVESTMENTS

(All such investments will be sterling denominated, with maturities up to maximum of 1 year, meeting the minimum 'high' rating criteria where applicable)

	Minimum 'High' Credit Criteria	Use
Debt Management Agency Deposit Facility	-	In-house
Term deposits – local authorities	-	In-house
Term deposits – banks and building societies	Green	In-house

Term deposits with nationalised banks and banks and building societies:

	Minimum Credit Criteria	Use	Max % of total investments	Max. maturity period
Lloyds Bank	Blue	In-house	£3 million	Up to 1 year
UK part nationalised banks	Blue	In-house	£2 million	Up to 1 year

Collective Investment Schemes structured as Open Ended Investment Companies (OEICs): -		
1. Government Liquidity Funds	MMF Rating	In-house
2. Money Market Funds	MMF Rating	In-house

## Accounting treatment of investments

The accounting treatment may differ from the underlying cash transactions arising from investment decisions made by this Council. To ensure that the Council is protected from any adverse revenue impact, which may arise from these differences, we will review the accounting implications of new transactions before they are undertaken.

## A Guide to Money Market Funds

<b>Definition</b>	A pool of cash managed by an independent fund management company. Frequently these are well known banks or investment houses
<b>Investment</b>	Investors purchase units (shares) of the fund which are held on their behalf in a custody account.
<b>Returns</b>	Returns in line with either 7-day or 1-month LIBID are targeted by most funds.
<b>Liquidity</b>	The funds are very liquid. Shares can be purchased and sold on the same day if necessary and without penalty. Deals are subject to a cut-off time which varies from manager to manager but can be as late as 2pm.
<b>Variety</b>	Two types of classes exist – <ol style="list-style-type: none"> <li>1) Stable Net Asset Value (SNAV) – the most common variety. Prices are fixed and interest is credited to investors in the form of a dividend.</li> <li>2) Accumulating Net Asset Value (ANAV) – interest is credited to the shares and the price rises to reflect the return achieved.</li> </ol>
<b>Accounting</b>	Purchases of MMF shares do not score as capital expenditure. Sales do not score as capital receipts.
<b>Legality</b>	Local authorities are permitted to invest in sterling denominated funds with an AAA credit rating and domiciled in the EU.
<b>Regulation</b>	UK-based Funds are regulated by the Financial Services Authority. Those domiciled in other EU zones (the majority) are regulated via the Undertakings for Collective Investment in Transferable Securities (UCITS) Code. The Code lays down strict common standards of investment and management.
<b>Portfolio holdings</b>	Cash is invested in a selection of high quality, high liquidity securities including: time deposits, certificates of deposit, short-dated gilts, corporate bonds and notes, commercial paper etc.

<b>Credit rating</b>	Local authorities are empowered to place funds in investment schemes with a high credit rating. Money Market Funds fall into this category and are all rated by one or more of the three rating agencies. Credit Quality – measures the financial strength of the fund (not the manager) and the probability of it defaulting.
<b>Risk management</b>	<p>The funds eligible for local authority investment score highly on credit quality and low volatility. All have an AAA rating which means that the chances of default are considered minimal.</p> <ol style="list-style-type: none"> <li>1) Rating requirements – in order to maintain an AAA rating fund managers must adhere to requirements specified by the rating agencies. These include: <ul style="list-style-type: none"> <li>• A maximum exposure to any one counterparty (concentration ratio) between 5% &amp; 10%</li> <li>• A maximum weighted average maturity (WAM) for the entire fund – typically 60 days</li> <li>• A minimum level of overnight investments to ensure high liquidity</li> <li>• A lower limit on quality of investment counterparty</li> </ul> </li> <li>2) Ring fencing – monies received from share purchases are invested in financial instruments by the managing organisation. Deposits/security investments are held in custody by a non-related company that specialises in custody services. Counterparty exposure of the fund (and of the investor) is to the underlying securities and not to the management company.</li> </ol>
<b>Exposure limits</b>	In view of the funds’ low concentration ratios; quality of asset holdings; maximum WAM and ring-fencing arrangements, counterparty risk is spread widely. MMFs possess the same status as external fund managers operating cash/gilt funds for local authorities. They should have their own counterparty limit which can be considerably greater than that accorded to individual investment counterparties.