MONTANA BOARD OF INVESTMENTS

Department of Commerce

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Senator Sue Malek, Chairwoman State Administration and Veterans Affair Interim Committee State Capitol Helena, MT 59625

November 2, 2018

Madam Chairwoman,

I apologize for not being able to attend my first State Administration and Veterans Affair (SAVA) Committee meeting as Executive Director but we are unfortunately the victims of a scheduling conflict where both SAVA and the Board of Investments are meeting at the same time. Please accept this note as an update on behalf of the Board and, as always, feel free to forward any questions the Committee may have to me for response.

SOC 1 TYPE 2 AUDIT

On October 15, Wipfli, a national assurance, accounting, and auditing firm, presented the Board with a clean opinion of our new Service Organization Control (SOC) 1 Type 2 audit. This audit evaluates the internal controls, policies and procedures of the Board's operations. The only finding was relating to password complexity which was not controlled by the Board but rather the Department of Administration. The issue was promptly resolved. We are very proud to have this independent validation of the controls put in place to protect Montanans.

TRANSFER OF MONTANA PROPERTIES TO TRUST FUND

In August, the Board approved transferring the Montana Properties (those rented by state agencies in Helena and Bozeman) from the Consolidated Asset Pension Pool (CAPP) to the Trust Fund Investment Pool (TFIP). These properties present mutually beneficial results to the agencies and the Board in terms of lease rates and return on investment. The final movement of the assets took place on October 24 with much coordination by the Board's capable staff and its custodial bank.

PENSION FUND RETURNS

As of September 30, 2018, the realized returns and assumed returns, determined by the Public Employee Retirement System Board and Teachers Retirement System Board pursuant to Article VIII, Section 15 of the Montana Constitution, are as follows:

Plan	Realized Return	Assumed Return
Teachers	7.80%	7.50%
Volunteer Firefighters	7.46%	7.65%
Sheriffs	7.67%	7.65%
Public Employees	7.78%	7.65%
Police	7.64%	7.65%
Judges	7.68%	7.65%
Highway Patrol	7.66%	7.65%
Game Wardens	7.68%	7.65%
Firefighters	7.63%	7.65%

CRIB SHEET

Attached is the Crib Sheet which will be presented to the Board in November.

PEER PERFORMANCE

Attached are the CEM Benchmarking results. You can see the Board is in the top quartile of similarly sized plans for the 5-year review period. A few items of note:

- The Board's costs were lower than the peer median by nearly 10%.
- The 5-year net total return was above the US Public median and peer median.
- The 5-year policy return was above both the US public median and peer median.

Overall, these results are very encouraging, providing validation to the Boards prudent management of the funds.

I look forward to visiting with you at your next meeting and wish you a productive 2019 Legislative Session.

Sincerely,

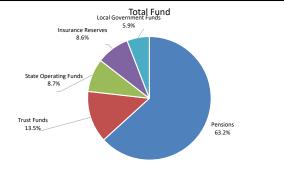
DAN VILLA

Executive Director

LEBE

MBOI Snapshot As of 9/30/2018 unaudited

Total Fund	Market Value	%
Pensions	\$11,815,400,612	63.2%
Trust Funds	\$2,530,857,357	13.5%
State Operating Funds	\$1,624,300,625	8.7%
Insurance Reserves	\$1,613,483,260	8.6%
Local Government Funds	\$1,097,728,401	5.9%
Grand Total	\$18,681,770,254	100.0%



Market Value

\$786,155,734

\$705,807,046

\$562,622,554

\$481,440,909

\$276,677,315

\$226,386,445

\$213,064,749

\$108,207,560

\$105,088,212

\$4,918,989,508

Market Value

\$105,088,212

\$101,002,708

\$562,622,554

\$372,625,314

\$140,334,928

Market Value

\$2,356,238,930

\$4,085,504

29.5%

16.0%

14.3% 11.4%

9.8%

5.6%

4.6%

4.3%

2.2%

2.1%

100.0%

%

9.9%

9.5%

0.4%

52.9%

35.1%

13.2%

\$1,453,538,982

Top Ten Non-Pension Accounts

TRUST AND LEGACY ACCOUNT

PERMANENT COAL TRUST FUND

TREASURE STATE ENDOWMENT

MONTANA STATE UNIVERSITY

RESOURCE INDEMNITY TRUST

STATE FUND INSURANCE

STATE OF MONTANA

TOBACCO TRUST FUND

BIG SKY ECON DEV FD

BIG SKY ECON DEV FD

IN STATE LOANS

Trust Funds Investment Pool

TRUST FUNDS INVESTMENT POOL

TRUST FUNDS INVESTMENT POOL

TRUST FUNDS INVESTMENT POOL

SHORT TERM INVESTMENT POOL

PERMANENT COAL TRUST FUND

Total

Coal Tax Trust

TREASURERS

Pension Internal	/External	Pension Active/Pa	ssive
External 77.3%	Internal 22.7%	Passive 27.7%	Active 72.3%
Internal	External	Active	Passive

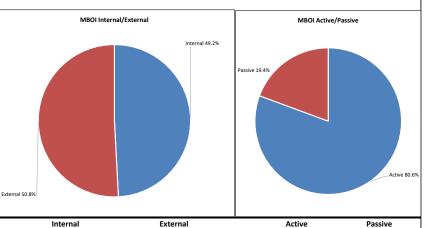
77.3%

\$ 11,815,400,612

2,682,095,939 \$ 9,133,304,673

22.7%

9,183,958,257 \$



\$ 8,542,534,643 \$

72.3%

\$ 15,063,111,356 \$ 3,618,658,898.19

3,272,865,970

11,815,400,612

27.7%

Pension by Plan	Market Value	%
PUBLIC EMPLOYEES' RETIREMENT	\$5,883,163,769	49.8%
TEACHERS' RETIREMENT	\$4,206,071,358	35.6%
FIREFIGHTERS' RETIREMENT	\$441,501,616	3.7%
POLICE RETIREMENT	\$424,670,108	3.6%
SHERRIF'S RETIREMENT	\$367,208,773	3.1%
GAME WARDEN'S RETIREMENT	\$198,664,284	1.7%
HIGHWAY PATROL RETIREMENT	\$151,252,886	1.3%
IUDGES' RETIREMENT	\$104,210,903	0.9%
VOL. FIREMANS' RETIREMENT	\$38,656,914	0.3%
Total	\$11,815,400,612	100.0%
Retirement Plan Cash	\$ 234,824,253	2.0%
Retirement Plan CAPP	\$ 11,580,576,359	98.0%

CONSOLIDATED ASSET PENSION POOL BY ASSET CLASS
NATURAL RESOURCES PAC 2.7% INVESTMENT TIPS PAC GRADE CREDIT PAC 3.3% CASH EQUIVALENTS PAC 3.7% ASRACED PAC 3.8% NORTGAGE BACKED PAC 3.8% REAL ESTATE PAC VISTREASURY PAC PAC US TREASURY PAC PAC REAL ESTATE PAC NORTGAGE BACKED PAC 3.8% REAL ESTATE PAC NORTGAGE BACKED PAC 3.8% REAL ESTATE PAC INTERNATIONAL EQUITY PAC EQUITY PAC INTERNATIONAL EQUITY PAC
10.7%

1%			
4 Row Labe	ls	Market Value	%
DOMESTI	C EQUITY PAC	\$4,092,652,142	35.3%
INTERNAT	TIONAL EQUITY PAC	\$2,026,876,937	17.5%
PRIVATE E	EQUITY PAC	\$1,239,449,902	10.7%
US TREAS	URY AGENCY PAC	\$950,629,959	8.2%
REAL ESTA	ATE PAC	\$815,592,291	7.0%
MORTGA	GE BACKED PAC	\$435,139,575	3.8%
CASH EQU	JIVALENTS PAC	\$426,083,214	3.7%
% TIPS PAC		\$383,754,646	3.3%
0% INVESTM	ENT GRADE CREDIT PAC	\$378,191,874	3.3%
)% HIGH YIEL	D PAC	\$325,162,963	2.8%
0% NATURAL	RESOURCES PAC	\$311,432,609	2.7%
BROAD FI	XED INCOME PAC	\$145,053,843	1.3%
DIVERSIFY	ING STRATEGIES PAC	\$50,556,404	0.4%
Grand To	tal	\$11,580,576,359	100.0%

Total	\$1,062,804,930	100.0%
SHORT TERM INVESTMENT POOL	\$3,979,209	0.4%
TRUST FUNDS INVESTMENT POOL	\$18,564,116	1.7%
SCHOOL FACILITIES FUND	\$22,543,325	2.1%
IN STATE LOANS	\$171,447	0.0%
SHORT TERM INVESTMENT POOL	\$3,175,551	0.3%
TRUST FUNDS INVESTMENT POOL	\$273,330,317	25.7%
TREASURE STATE ENDOWMENT	\$276,677,315	26.0%
SHORT TERM INVESTMENT POOL	\$1,191,547	0.1%
TRUST FUNDS INVESTMENT POOL	\$94,681,977	8.9%
TREASURE ST. REG. WATER SYSTEM	\$95,873,524	9.0%
SHORT TERM INVESTMENT POOL	\$11,150,142	1.0%
VHLM Mortgage	\$38,512,170	3.6%

7	5,105,550,257	~	J, TJ 1, OII, JJ 1	Y	13,003,111,330	Y	3,010,030,030.13	
	49.2%		50.8%		80.6%		19.4%	ı
		\$	18,681,770,254			\$	18,681,770,254	Ro
			Intercap Statistics					DC
Loans Outstanding				\$	77,292,997			IN
Bonds Outstanding				\$	105,110,000			PR
Number of Borrowers					189			US
Loan Rate					3.15%			RE.
								M
			Short Term Investment P	ool				CA
Account			# Accounts	Tot	tal Market Value		<u>%</u>	TIP
Total State			314	\$	2,231,739,059		67.0%	IN۱
Total Local			157	\$	1,097,728,401		33.0%	ню
Total STIP			471	\$	3,329,467,460		100.0%	NΑ
STIP Reserve				\$	35,396,210			BR
STIP NAV with Reserve					1.010855			D۱۱
Average Current Month	STIP Yield				2.0735%			Gra

9,497,811,997

Montana Board of Investments CEM Benchmarking Results

(for the 5-year period ending December 31, 2017)

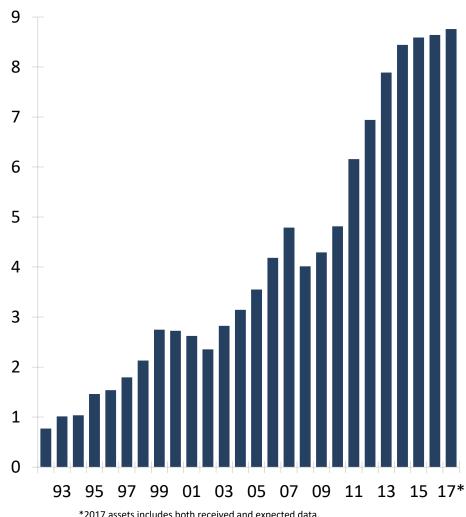


This benchmarking report compares your cost and return performance to the 234 funds in CEM's extensive pension database.

- 135 U.S. pension funds participate. The median U.S. fund had assets of \$10.7 billion and the average U.S. fund had assets of \$21.3 billion. Total participating U.S. assets were \$2.9 trillion.
- 65 Canadian funds participate with assets totaling \$746.4 billion.
- 26 European funds participate with aggregate assets of \$2.4 trillion.
- 6 Asia-Pacific funds participate with aggregate assets of \$221.9 billion.

The most meaningful comparisons for your returns and implementation impacts are to the U.S. Public universe which consists of 52 funds.

Participating assets (\$ trillions)

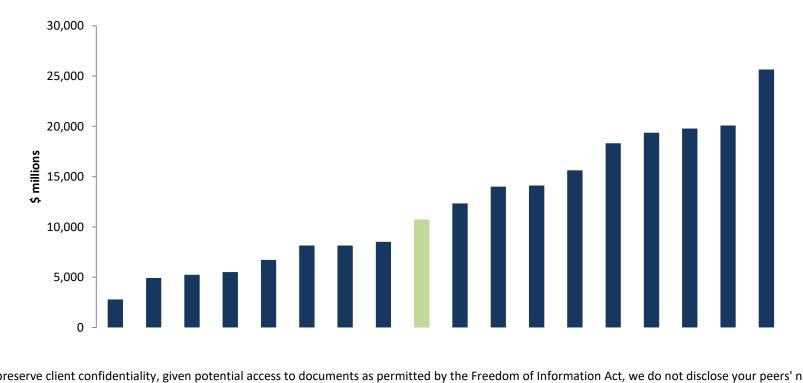


*2017 assets includes both received and expected data.

The most valuable comparisons for cost performance are to your custom peer group because size impacts costs.

Peer group for Montana Board of Investments

- 18 U.S. Public public sponsors from \$2.8 billion to \$25.7 billion
 - Median size of \$11.5 billion versus your \$10.7 billion



To preserve client confidentiality, given potential access to documents as permitted by the Freedom of Information Act, we do not disclose your peers' names in this document.

Peers are selected based on best-fit in terms of total fund size as well as maximum commonality in asset classes.

What gets measured gets managed, so it is critical that you measure and compare the right things:

1. Returns

Why do total returns differ from other funds? What was the impact of your policy mix decisions? Asset mix is the most important driver of total returns.

2. Implementation impact

How does your implementation impact your total returns?

3. Costs

Are your costs reasonable? Costs matter and can be managed.

4. Cost effectiveness

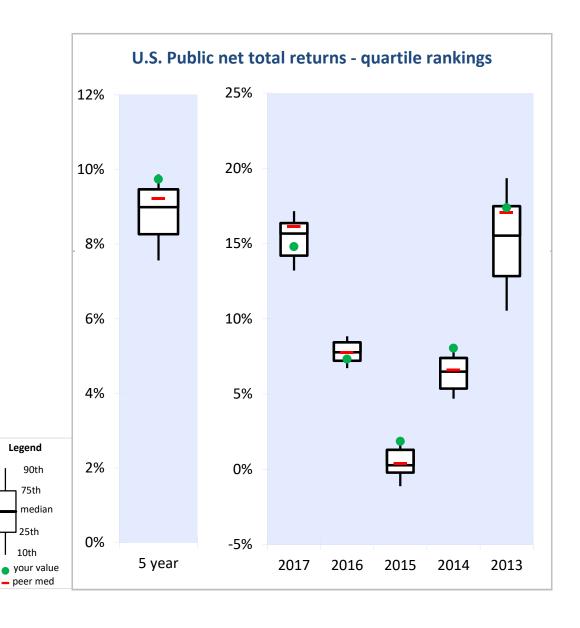
Implementation impact versus excess cost. Does paying more get your more?

Your 5-year net total return of 9.7% was above both the U.S. Public median of 9.0% and the peer median of 9.2%.

Total returns, by themselves, provide little insight into the reasons behind relative performance. Therefore, we separate total return into its more meaningful components: policy return and implementation impacts.

	Your 5-year
Net total fund return	9.7%
- Policy return	10.4%
= Implementation impacts	-0.7%

This approach enables you to understand the contribution from both policy mix decisions (by far the most important driver of total return) and implementation impacts.



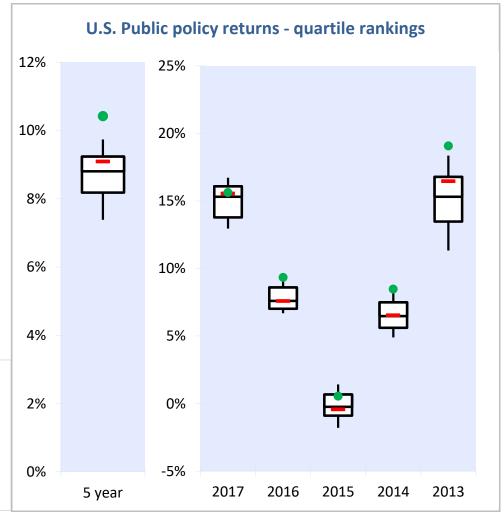
Your 5-year policy return of 10.4% was above both the U.S. Public median of 8.8% and the peer median of 9.1%.

Your policy return is the return you could have earned passively by indexing your investments according to your policy mix.

Having a higher or lower relative policy return is not necessarily good or bad. Your policy return reflects your investment policy, which should reflect your:

- Long term capital market expectations
- Liabilities
- Appetite for risk

Each of these three factors is different across funds. Therefore, it is not surprising that policy returns often vary widely between funds.



To enable fairer comparisons, the policy returns of all participants, including your fund, were adjusted to reflect private equity benchmarks based on lagged, investable, public-market indices. Your custom benchmark composed of 20% Europe ex-UK, 10% Global, and 70% U.S. small cap equity with a lag of 85 days. Prior to this adjustment, your 5-year policy return was 10.8%, 0.4% higher than your adjusted 5-year policy return of 10.4%. Mirroring this, your 5-year total fund implementation impact would be 0.4% lower.

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Legend 90th

> 75th median 25th

10th
your value

peer med

Your 5-year policy return of 10.4% was above the U.S. Public median of 8.8% because of several different factors:

- The positive impact of your higher weight and your higher benchmark return in one of the best performing asset classes of the past 5 years: U.S. Stock (your 36% 5-year average weight versus a U.S. Public average of 21%).
- The positive impact of your lower weight in Inflation-indexed Bonds (your 0% 5-year average weight versus a U.S. Public average of 3%).
 Inflation-indexed Bonds were one of the worst performing asset classes over the past 5 years.
- You had a higher allocation to Private Equity, which was also one of the best performing asset classes over the past 5 years. Your 12% allocation compares to 9% for the U.S. Public average.
- Finally, your 0% allocation to Hedge Funds had a positive impact. The 5-year U.S. Public allocation was 6% on average.

	Your U.S. Puble More/			Your U.S. Publ		
	Fund	Avg.	Less	Fund	Avg.	
U.S. Stock	36%	21%	15%	15.9%	15.5%	
EAFE/Global/Emerging	18%	27%	-9%	n/a³	n/a³	
Total Stock	54%	47%	6%	13.0%	11.8%	
U.S. Bonds	22%	17%	5%	2.1%	2.2%	
Inflation Indexed Bonds	0%	3%	-3%	n/a³	1.0%	
High Yield Bonds	3%	2%	1%	5.8%	5.5%	
Fixed Income - Emerging	0%	1%	-1%	n/a³	2.3%	
Fixed Income - Global	0%	2%	-2%	n/a³	2.0%	
Other Fixed Income ²	2%	1%	1%	n/a³	n/a³	

5-Year average policy mix¹

5-year policy

return

26%

0%

8%

0%

12%

100%

26%

6%

8%

3%

9%

100%

0%

-6%

0%

-3%

3%

0%

2.4%

n/a³

n/a³

n/a³

15.1% 15.2%

2.9%

5.0%

n/a³

n/a³

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Total Fixed Income

Real Estate incl. REITS

Other Real Assets²

Hedge Funds

Private Equity

Total

^{1. 5-}year weights are based only on plans with 5 years of continuous data.

^{2.}Other fixed income includes long bonds and private debt. Other real assets includes commodities, natural resources and infrastructure.

^{3.} A value of 'n/a' is shown if asset class returns are not available for the full 5 years or if they are broad and incomparable.

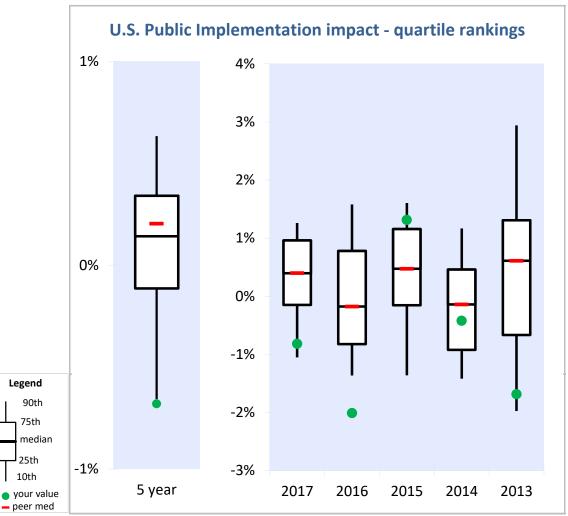
Implementation impact is the difference between total net return and policy return. Your 5-year Implementation impact of -0.7% compares to a peer median of 0.2% and a U.S. Public median of 0.1%.

Implementation impact for Montana Board of Investments

	Net	Policy	Impl.
Year	Return	Return	Impact
2017	14.8%	15.6%	-0.8%
2016	7.3%	9.3%	-2.0%
2015	1.9%	0.5%	1.3%
2014	8.0%	8.5%	-0.4%
2013	17.4%	19.1%	-1.7%
5-Year	9.7%	10.4%	-0.7%

Implementation typically has a modest impact on total fund returns. Implementation impacts are mainly due to:

- Differences in asset class benchmarks across funds.
- Differences between actual holdings and policy weights for asset classes. These differences may be due to tactical asset allocation or rebalancing policies.
- Net return relative to benchmark returns within asset classes.



To enable fairer comparisons, the implementation impact for each participant including your fund was adjusted to reflect private equity benchmarks based on investable public market indices. Your custom benchmark composed of 20% Europe ex-UK, 10% Global, and 70% U.S. small cap equity with a lag of 85 days. Prior to this adjustment, your fund's 5-year total fund implementation impact was -1.0%.

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Legend 90th

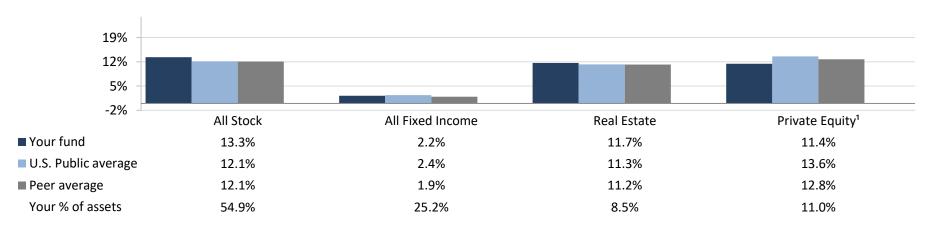
75th

25th

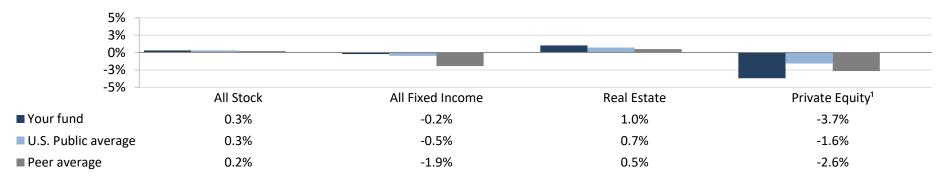
10th

Comparisons of your 5-year net return and implementation impacts by major asset class:

5-year average net return by major asset class



5-year average net return relative to benchmark² by major asset class



^{1.} To enable fairer comparisons, the private equity benchmarks of all participants, including your fund were adjusted to reflect lagged, investable, public-market indices. Your custom benchmark composed of 20% Europe ex-UK, 10% Global, and 70% U.S. small cap equity with a lag of 85 days. Prior to this adjustment, your fund's 5-year private equity implementation impact was -6.8%.

2. For the U.S. Public universe and your peers, the difference shown is the difference between their average net return and their average benchmark return.

The following cost types are included/excluded in the calculation of your total investment cost.

	Inte	rnal	External			
	In-house total	Transaction	Manager base	Monitoring &	Perform. fees	Transaction
Asset class	cost	costs	fees	other costs	(active only)	costs
Public (Stock, Fixed income, commodities, REITs)	✓	×	√	✓	✓	*
Derivatives/Overlays	✓	×	✓	✓	✓	*
Hedge funds & Global TAA						
Hedge Funds	n/a	n/a	✓	\checkmark	\checkmark	*
Global TAA	\checkmark	*	✓	\checkmark	\checkmark	*
Private equity (Diversified private equity, venture capital, LBO, other private equity)	✓	×	√ *	✓	×	×
Private real assets (Infrastructure, natural resources, real estate ex-REITs, other real assets)	✓	×	√ *	✓	×	×

^{*} For limited partnerships, external manager base fees represent gross contractual management fees.

- ✓ indicates cost is included.
- * indicates cost is excluded.
- CEM currently excludes external private asset performance fees and all transaction costs from your total cost because only a limited number of participants are currently able to provide complete data.

Your investment costs were \$60.9 million or 56.9 basis points in 2017.

Asset management costs by asset	Internal Mgmt		Exte	rnal Manage	agement		
class and style (\$000s)	Active	Overseeing	Passive	Active	Perform.		
		of external	fees	base fees	fees	Tota	I
Stock - U.S. Broad/All		478	314	8,953		9,745	
Stock - ACWI x U.S.		378	1,222	4,249		5,850	
Fixed Income - U.S.	447	64		410		921	
Fixed Income - High Yield		85		1,108		1,193	
Cash	49					49	
Real Estate ex-REITs ¹		185		2,422		2,607	
Real Estate - LPs ¹		265		7,279		7,543	
Natural Resources - LPs ¹		60		4,179		4,240	
Diversified Private Equity - LPs ¹		547		18,646		19,194	
Diversified Private Equity - FoFs ¹		157		6,613		6,770	
Total excluding private asset performance fees 58,111						54.2bp	
Oversight, custodial and other cost	ts ²						
Oversight of the fund						1,145	
Trustee & custodial						1,255	
Consulting and performance measu	ırement					342	
Audit						74	
Other						0	
Total oversight, custodial & other c	osts					2,817	2.6bp
Total investment costs (excl. transa	ction co	sts & private	asset per	formance	fees)	60,927	56.9bp

Footnotes

- 1. Total cost and subsequent benchmarking analysis excludes carry/performance fees for real estate, infrastructure, natural resources and private equity. Performance fees are included for the public market asset classes and hedge funds.

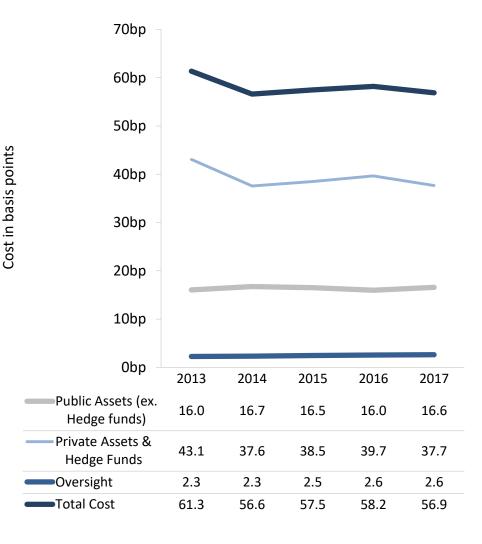
 2. Excludes non-investment costs, such as benefit
- Excludes non-investment costs, such as benefit insurance premiums and preparing cheques for retirees.

Your costs decreased slightly between 2013 and 2017.

Your costs decreased primarily because:

- You decreased your investment in the highest cost asset classes. Your holdings of private real assets and private equity decreased from 22% of assets in 2013 to 20% in 2017.
- You increased your use of lower cost passive and internal management from 52% of assets in 2013 to 54% in 2017.
- You decreased your use of funds of funds from 13% of private real assets and private equity in 2013 to 12% in 2017. Funds of funds are higher cost than direct funds.

Trend in your investment costs

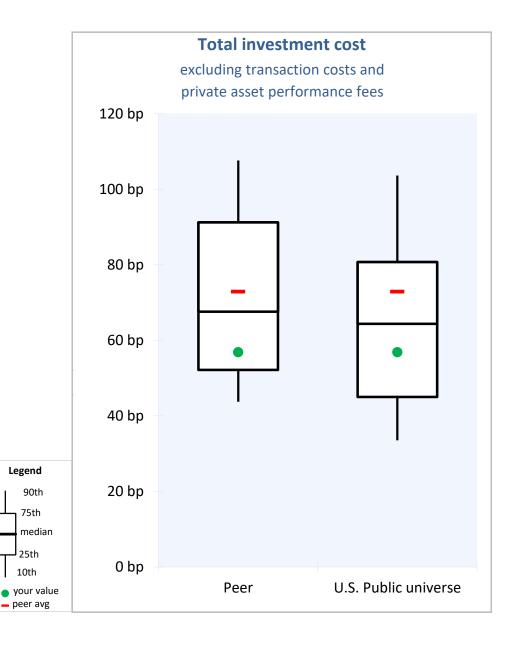


Your total investment cost of 56.9 bps was below the peer median of 67.6 bps.

Differences in total investment cost are often caused by two factors that are often outside of management's control:

- Asset mix, particularly holdings of the highest cost asset classes: real estate (excl REITS), infrastructure, hedge funds and private equity. These high cost assets equaled 20% of your funds assets at the end of 2017 versus a peer average of 24%.
- Fund size. Bigger funds have advantages of scale.

Therefore, to assess whether your costs are high or low given your unique asset mix and size, CEM calculates a benchmark cost for your fund. This analysis is shown on the following page.



Benchmark cost analysis suggests that, after adjusting for fund size and asset mix, your fund was slightly low cost by 2.5 basis points in 2017.

Your benchmark cost is an estimate of what Your cost would be given your actual asset mix and the median costs that your peers pay for similar services. It represents the cost your peers would incur if they had your actual asset mix.

Your total cost of 56.9 bp was slightly below your benchmark cost of 59.3 bp. Thus, your cost savings was 2.5 bp.

Your cost versus benchmark

	\$000s	basis points
Your total investment cost	60,927	56.9 bp
Your benchmark cost	63,559	59.3 bp
Your excess cost	(2,632)	(2.5) bp

Your fund was slightly low cost primarily because you had a lower cost implementation style.

Reasons for your low cost status

	Excess Co (Saving	
	\$000s	bps
Lower cost implementation style		
 Less external active management (more lower cost passive and internal) 	(1,687)	(1.6)
 More partnerships as a percentage of external 	1,127	1.1
 Less fund of funds 	(1,376)	(1.3)
 Less overlays 	(590)	(0.6)
 Other style differences 	78	0.1
	(2,448)	(2.3)
2. Paying less than peers for similar services		
External investment management costs	(199)	(0.2)
 Internal investment management costs 	(75)	(0.1)
 Oversight, custodial & other costs 	90	0.1
	(184)	(0.2)
Total savings	(2,632)	(2.5)

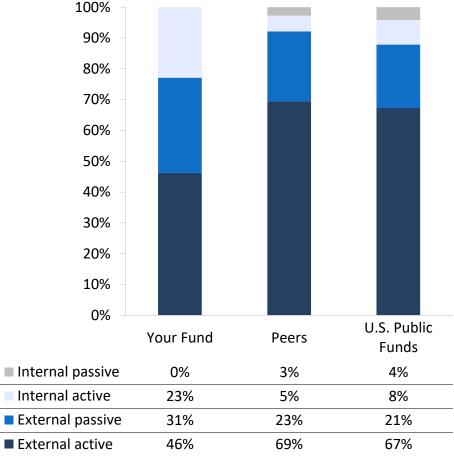
Differences in cost performance are often caused by differences in implementation style.

Implementation style is defined as the way in which your fund implements asset allocation. It includes internal, external, active, passive and fund of funds styles.

The greatest cost impact is usually caused by differences in the use of:

- External active management because it tends to be much more expensive than internal or passive management. You used less external active management than your peers (your 46% versus 69% for your peers).
- Within external active holdings, fund of funds usage because it is more expensive than direct fund investment. You had less in fund of funds. Your 12% of hedge funds, real estate and private equity in fund of funds compared to 20% for your peers.

Implementation style¹



^{1.} The graph above does not take into consideration the impact of derivatives. Values in the graph are calculated using average holdings.

Differences in implementation style saved you 2.3 bp relative to your peers.

Calculation of the cost impact of differences in implementation style

	Your avg	<u>% External active</u>		Premium	Cost	t/	
	holdings in		Peer	More/	vs passive &	(savin	ıgs)
Asset class	\$mils	You	average	(less)	internal ¹	\$000s	bps
	(A)			(B)	(C)	(A X B X C)	
Stock - U.S. Broad/All	3,852	42.7%	37.7%	4.9%	43.5 bp	824	
Stock - ACWI x U.S.	1,836	39.8%	56.1%	(16.2%)	40.4 bp	(1,206)	
Fixed Income - U.S.	2,250	10.7%	55.5%	(44.8%)	14.3 bp	(1,437)	
Fixed Income - High Yield	221	100.0%	95.0%	5.0%	14.6 bp	16	
Real Estate ex-REITs	916	100.0%	98.4%	1.6%	80.7 bp	116	
Impact of more/less external ac	ctive vs. lower cos	t styles				(1,687)	(1.6) bp
					Premium		
		LPs %	of externa	al active	vs. ea ¹		
Real Estate ex-REITs	916	64.8%	57.5%	7.3%	44.0 bp	292	
Natural Resources	301	100.0%	54.4%	45.6%	60.8 bp	835	
Impact of more/less partnershi	ps as a percentage	e of exteri	nal active			1,127	1.1 bp
					Premium		
		<u>Fund</u>	of funds %	6 of LPs	vs. direct LP ¹		
Real Estate ex-REITs	593	0.0%	2.7%	(2.7%)	54.8 bp	(88)	
Diversified Private Equity	1,736	22.7%	33.3%	(10.6%)	70.2 bp	(1,288)	
Impact of more/less fund of fur	nds vs. direct LPs					(1,376)	(1.3) bp
Impact of higher use of portfoli	o level overlays					(590)	(0.6) bp
Impact of mix of internal passive, internal active, and external passive ²					78	0.1 bp	
Total impact of differences in implementation style					(2,448)	(2.3) bp	

^{1.} The cost premium is the additional cost of external active management relative to the average of other lower cost implementation styles - internal passive, internal active and external passive.

^{2.} The 'Impact of mix of internal passive, internal active and external passive' quantifies the net cost impact of differences in cost between, and your relative use of, these 'low-cost' styles.

^{3.} Asset classes are not shown where you are implemented exactly the same as peers (i.e. cost/savings impact is zero).

The net impact of paying more/less for external asset management costs saved 0.2 bps.

Cost impact of paying more/(less) for external asset management

		Your avg	Cost in bps			Cost/
		holdings	Your	Peer	More/	(savings)
	Style	in \$mils	Fund	median	(less)	\$000s
External asset management		(A)			(B)	(A X B)
Stock - U.S. Broad/All	passive	2,209	1.4	1.6	(0.1)	(32)
Stock - U.S. Broad/All	active	1,643	57.4	45.1	12.3	2,025
Stock - ACWI x U.S.	passive	1,104	11.1	5.9	5.2	575
Stock - ACWI x U.S.	active	731	63.3	46.3	17.0	1,241
Fixed Income - U.S.	active	241	19.7	16.5	3.2	77
Fixed Income - High Yield	active	221	53.9	40.6	13.3	295
Real Estate ex-REITs	active	323	80.8	80.8	0.0	0
Real Estate ex-REITs	LP	593	127.2	123.3	3.8	228
Natural Resources	LP	301	140.7	142.8	(2.0)	(61)
Diversified Private Equity	FoF	394	67.0	73.0	(6.0)	(236)
Underlying base fees	FoF	394	104.6	157.0	(52.4)	(2,065)
Diversified Private Equity	LP	1,342	143.1	159.8	(16.7)	(2,245)
Total impact of paying more/less for exter	nal manage	ment				(199)
Total in bps						(0.2) bp

The net impact of paying more/less for internal asset management costs saved 0.1 bps.

Cost impact of paying more/(less) for internal asset management

		Your avg	Cost in bps		Cost/	
		holdings	Your	Peer	More/	(savings)
	Style	in \$mils	Fund	median	(less)	\$000s
Internal asset management		(A)			(B)	(A X B)
Fixed Income - U.S.	active	2,009	2.2	2.6	(0.4)	(75)
Cash	active	444	1.1	Excluded		
Total for internal management						(75)
Total in bps						(0.1) bp

^{&#}x27;Excluded' indicates that the asset class was excluded from this analysis due to comparability concerns with peers.

The net impact of differences in oversight, custodial & other costs added 0.1 bps.

Cost impact of differences in oversight, custodial & other costs

	Your avg	Cost in bps			Cost/
	holdings	Your	Peer	More/	(savings)
	in \$mils	Fund	median	(less)	\$000s
	(A)			(B)	(A X B)
Oversight	10,715	1.1	1.2	(0.1)	(151)
Consulting	10,715	0.3	0.6	(0.2)	(262)
Custodial ¹	10,715	1.2	0.5	0.6	687
Audit	10,715	0.1	0.1	(0.0)	(27)
Other ²	10,715	0.0	0.1	(0.1)	(157)
Total for oversight, custodial, other					90
Total in bps					0.1 bp

- 1. Important additional information about your custodial fees relative to peers:
- a. The peer median of 0.5 bps is unusually low. The U.S. universe median custodial cost was 0.8 bps.
- b. You have a more complex structure than your peers. You have 9 plans on your platform, most peers have less than 2 plans.
- c. Specific services provided by custodians for funds vary somewhat. CEM does not collect detailed data related to specific custodial arrangements.
- 2. 'Other' typically includes legal fees and fiduciary manager fees that apply to the plan as a whole and cannot be allocated to specific asset classes.

In summary, your fund was slightly low cost primarily because you had a lower cost implementation style.

Reasons for your low cost status

	Excess C (Saving	·
	\$000s	bps
Lower cost implementation style		
Less fund of funds	(1,376)	(1.3)
 Less external active management (more lower cost passive and internal) 	(1,687)	(1.6)
 Less overlays 	(590)	(0.6)
 Other style differences 	78	0.1
	(2,448)	(2.3)
2. Paying less than peers for similar services		
External investment management costs	(199)	(0.2)
 Internal investment management costs 	(75)	(0.1)
 Oversight, custodial & other costs 	90	0.1
	(184)	(0.2)
Total savings	(2,632)	(2.5)

Key takeaways

Returns

- Your 5-year net total return was 9.7%. This was above the U.S. Public median of 9.0% and above the peer median of 9.2%.
- Your 5-year policy return was 10.4%. This was above the U.S. Public median of 8.8% and above the peer median of 9.1%.

Implementation impact

• Your 5-year implementation impact was -0.7%. This was below the U.S. Public median of 0.1% and below the peer median of 0.2%.

Cost and cost effectiveness

- Your investment cost of 56.9 bps was below your benchmark cost of 59.3 bps. This suggests that your fund was slightly low cost compared to your peers.
- Your fund was slightly low cost primarily because you had a lower cost implementation style.