



*CHURCH OF THE BRETHREN BENEFIT TRUST INC.
INVESTMENT GUIDELINES*

Introduction

The Church of the Brethren Benefit Trust Inc. has as one of its primary responsibilities the general oversight of assets under its supervision.

These investment guidelines reflect the efforts of BBTI to properly fulfill its fiduciary responsibility in the management of these assets, as well as its commitment to the ethical and social values of the Church of the Brethren.

The Board of Directors of BBTI (the “Board”) has established an Investment Committee (the “Committee”) for the purpose of providing continuing review of the investment program and for making recommendations to the Board regarding the management of the assets under the supervision of the Board. The Board has delegated the responsibility for managing the investment of these assets to the president and/or treasurer of the organization and approved the use of professional investment consultants and managers in the management of these assets. The president and/or treasurer report to the Board and/or the Committee on the investment activity related to these assets.

The Board has approved the following guidelines for the investment of the assets for which it has supervisory responsibility.

I. General Guidelines Related to All Assets

A. Objectives

1. **Stability** — To maintain a high level of stability and security in all accounts by minimizing risk and volatility consistent with rate-of-return objectives.
2. **Preservation of Capital** — To preserve the capital investment in each account.
3. **Liquidity** — To maintain sufficient liquidity to provide for all anticipated withdrawals or transfers and to invest in issues with sufficient marketability to provide for unexpected withdrawals.
4. **Rate of Return** — To achieve first-quartile returns annualized over a five-year period in a universe of comparably managed accounts.

B. Standards of Care

To use the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent investor acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of like character and with like aims.

C. Diversification

To diversify the investment of the assets under the supervision of the Board so as to minimize the risk of large losses, unless under the circumstances it is clearly prudent not to do so.

1. **General**

- a. The securities of any one issuer, excluding securities issued by the U.S. Treasury and/or an agency of the U.S. government, shall not represent more than 10 percent of the market value of the assets in any account.
- b. The market value of stock or bond investments shall not exceed 5 percent of any company's total stock or debt outstanding.
- c. Investments in guaranteed investment contracts of any company shall not exceed 10 percent of the market value of the assets in any account.

2. Domestic Investments

- a. The market value of the stock or bond investments in any one sector, as determined using the sector classification assigned to a firm by the performance benchmark assigned in the ADDENDUM of the Investment Guidelines, shall not exceed 30 percent of the market value of the assets in any account.
- b. The market value of the stock or bond investments in any one industry, as determined using the industry classification assigned to a firm by the performance benchmark assigned in the ADDENDUM of the Investment Guidelines, shall not exceed 25 percent of the market value of the assets in any account except for short-term cash investments, which shall not exceed 30 percent.
- c. The investment manager shall immediately alert BBTI staff when a sector or industry limit has been exceeded and shall outline in writing the course of action for resolution.
- d. All investments shall be made in securities traded on a U.S. exchange or traded in U.S. dollars.

3. International Investments

- a. The market value of the stock or bond investments in any one sector, as determined using the sector classification assigned to a firm by the performance benchmark assigned in the ADDENDUM of the Investment Guidelines, shall not exceed 30 percent of the market value of the assets in any account.
- b. The market value of the stock or bond investment in any one industry, using the Morgan Stanley Capital International Europe, Australasia, and Far East (MSCI EAFE) Index, shall not exceed 25 percent of the market value of the assets in any account except for short-term cash investments, which shall not exceed 10%.
- c. The investment manager shall immediately alert BBTI staff when a sector or industry limit has been exceeded and shall outline in writing the course of action for resolution.
- d. The market value of the stock or bond investment in any one country, using the MSCI EAFE Index, shall not exceed 40 percent of the market value of the assets of the account.

D. Transactions

Security transactions are to be made on the basis of best price and execution.

E. Investment Funds

Various Funds are created through the use of separate accounts. It is the Committee's responsibility to diversify these Funds. Investing the Funds' assets in multiple asset classes and

using outside investment managers with well-diversified portfolios are done with the goal of insulating the portfolios from the effects of substantial losses in any single security or sector of the market. The Funds are to be invested based on the long-term nature of the asset class. Decisions made concerning the Funds are to be made with a five-year time horizon, with the understanding that the actual time horizon is much longer. The target asset allocation may be adjusted by the Investment Committee on a periodic basis.

F. Rebalancing

BBTI staff will review the asset allocation of the Funds on a quarterly basis and adjust the portfolios to comply with these guidelines as necessary. The Committee anticipates that the ongoing natural cash flow needs of the Funds (contributions and withdrawals) will be sufficient to maintain the allocation of the portfolios within targets under most market conditions.

The Committee will evaluate each Fund's investment structure to determine the optimal approach. An emphasis will be placed on separate accounts where appropriate. As such, the Committee has selected investment managers within each asset class to manage separate accounts (each firm is identified in the addendum).

G. General Restrictions for Separately Managed Accounts

1. Purchase domestic short-term securities only when issued by the U.S. Treasury or an agency or instrumentality of the U.S. government, commercial paper rated A-2 or higher by Standard & Poor's, negotiable certificates of deposit or bankers' acceptances, and bank time deposits of the 50 largest banks in the U.S. that have or whose holding companies have an S&P credit rating of A+ or higher or a BankWatch rating of B or higher, or of banks in the U.S. where such certificates of deposit or bankers' acceptances are fully insured by an agency of the federal government.
2. Purchase guaranteed investment contracts only when issued by companies rated A or higher by Moody's, Fitch, or Standard and Poor's.
3. At no time shall the lowest investment-grade ratings (Baa3 by Moody's, BBB- by Standard and Poor's, or BBB- by Fitch) make up more than 20 percent of a fixed income account.
4. No interest-only bonds, principal-only bonds, inverse floater bonds, or other high-risk derivative securities shall be purchased.
5. The maximum maturity of any bond purchased shall not exceed 30 years. Pass-through bonds with a maturity in excess of 20 years will be calculated on their average life.
6. With the exception of the Commodities-Based Fund, do not purchase leveraged commodities, commodity contracts, oil, gas, mineral leases, mineral rights, or royalty contracts.
7. Do not use margin transactions or short sales.
8. 144A, preferred, or convertible securities are not permitted unless requested in writing to the Committee and accepted within this policy.
9. Do not make investments in the securities of an issuer that, together with any predecessor, has been in operation for less than three years, except as provided below, or in securities of issuers for which market quotations are not readily available.
10. Do not make personal loans.

11. Do not make investments in local churches.
12. Make investments in agencies of the Church of the Brethren only if initially secured by collateral projected to have a minimum fair market value throughout the term of the loan equal to at least two times the amount invested, and only if that collateral can be converted to cash without significant adverse impact on the mission or activities of the agencies.
13. Exceptions to any aspect of this policy must be requested in writing to the Committee and accepted in writing by the Committee.

H. Ethical and Social Responsibility

1. Investments shall not knowingly be made in —
 - a. The currently listed and published top 25 publicly traded companies receiving prime military contract awards from the U.S. Department of Defense for the last full fiscal year or any publicly traded company where the ratio of the gross revenue received by the company from prime military contracts from the U.S. Department of Defense to the gross revenues of the company exceeds 10 percent.
 - b. Companies deriving more than 10 percent of annual gross revenues from the following —
 - i. The manufacture or sale of biological, chemical, or nuclear weapons; anti-personnel landmines; or cluster munitions.
 - ii. The manufacture or sale of firearms or military weapons systems, including key components.
 - iii. Abortion procedures or the manufacture or sale of products used primarily to complete abortion procedures.
 - iv. The manufacture or sale of alcoholic beverages.
 - v. The manufacture or sale of tobacco products.
 - vi. The production, sale, or distribution of pornography.
 - vii. The manufacture, sale, or operation of gambling devices.
 - c. Companies that have a history of engaging in or supporting human rights violations (including slavery and child labor), a history of permitting primary suppliers to engage in or support human rights violations (including slavery and child labor), or that directly support governments that systematically deny human rights.
 - d. Companies that are egregious or consistent violators of environmental regulations.
2. Investments in securities that support the creation and maintenance of a society consistent with the policy statements of the Church of the Brethren Annual Conference shall be favored to the extent that they otherwise satisfy the criteria in these guidelines. This may include, but is not limited to, investments in such areas as community redevelopment, social justice, and preservation and/or reclamation of our environment.
3. To avoid conflicts of interest, investments shall not knowingly be made in entities in which any officer, director, or employee of Church of the Brethren Benefit Trust Inc. is a director or

officer or owns a controlling financial interest unless the investment is approved by the Board, and such officer, director, or employee is a non-participant in the discussions and vote related to the investment.

4. There may be instances where a Fund is unable to utilize a separate account structure. In such cases, investors' assets may be exposed to issues that are in conflict with the Church of the Brethren social restrictions as noted above. Every effort will be made to minimize or eliminate any socially related conflicts.

I. Supervision

1. The Board will maintain and review —
 - a. The *Investment Guidelines* of the Board.
 - b. Procedures for a periodic analysis, at least annually, of the application of these *Investment Guidelines* and the performance resulting therefrom.
 - c. Procedures for handling the receipts, deliveries, transfers, and safekeeping of securities and the safeguarding of assets.
2. The indicia of ownership of all assets under the management of the Board shall be of BBTI or a nominee approved by the Board.
3. Investments in companies whose activities change so as to be out of compliance with the guidelines on ethical and social responsibilities shall be divested at the discretion of the president, treasurer, and/or investment manager(s).
4. In the event of sudden political and economic developments that, in the judgment of the president, are expected to have a significant, adverse effect on the assets under supervision of the Board, the president and/or treasurer is/are authorized to take emergency action that could change the asset mix related to such assets.

II. BBTI Funds

BBTI's primary responsibility is to provide pensions and other benefits to those who dedicate themselves in the employ of the Church. The benefit system assets under the supervision of the Board shall be managed solely in the interest of the participants and beneficiaries thereof for the exclusive purpose of —

- Providing financial benefit to the participants and their beneficiaries.
- Defraying reasonable expenses of administering said benefit system.

Accordingly, BBTI serves as administrator of various investment funds. Below is a listing of the BBTI Funds —

Active Lives

- Short-Term Fund With Treasuries
- Community Development Investment Fund
- Bond Fund
- Treasury-Free Bond Fund
- Treasury Inflation-Protected Securities Fund*
- Bank Loans Fund*
- High Yield Bond Fund*
- Global Aggregate Fixed Income Fund*

- Global Inflation Protection Fund*
- SRI Balanced Fund
- Balanced Fund
- Target Date Funds
 - Target Date Fund 2015
 - Target Date Fund 2025
 - Target Date Fund 2035
 - Target Date Fund 2045
 - Target Date Fund 2055
- Multi-Strategy Hedge Fund*
- Domestic Stock Large Cap Core Index Fund
- Domestic Stock Large Cap Core Fund
- Domestic Stock Mid Cap Fund
- Domestic Stock Growth Fund
- Common Stock Fund
- Small Cap Fund
- International Stock Core Fund
- Emerging Markets Stock Fund*
- Public Real Estate Fund*
- Commodities-Based Fund*

Other Funds

- Capital Development Fund
- Retirement Benefits Fund
- Church Workers' Assistance Plan Fund
- Supplemental Income Fund for Equitable Annuitants
- Insurance Plans Fund
- Medical Plan Fund
- Long-Term Disability Plan Fund

*Not currently using a separately managed account structure

The Committee will evaluate the Fund investment structures to determine the optimal approach. An emphasis will be placed on separate accounts where appropriate. Following are the guidelines for the Committee-approved BBTI Fund offerings —

A. Active Lives Funds

1. Short-Term Fund with Treasuries

- a. Investment Universe — Investments shall be in securities issued by the U.S. Treasury or an agency or instrumentality of the U.S. government; corporate bonds; guaranteed investment contracts; publicly-issued, SEC-registered, dollar-denominated, non-convertible bonds issued by entities not domiciled or headquartered in the U.S. (including corporate, sovereign, supranational, and quasi-government agency bonds); asset-backed securities; mortgage-backed securities; collateralized mortgage obligations; commercial paper issued by U.S. corporations; certificates of deposit or bankers' acceptances of U.S. banks; and short-term money market instruments.
- b. Asset Mix — All assets shall be fully invested at all times in fixed income securities that have a final stated maturity of 24 months or less. Not more than 10 percent of the assets shall be invested in municipal bonds. Not more than 10 percent of the assets shall be invested in publicly issued, SEC-registered, dollar-denominated, non-convertible bonds issued by entities not domiciled or headquartered in the U.S. (including corporate sovereign, supranational, and quasi-government agency bonds).

- c. Quality — All assets shall be invested in securities that are rated investment grade by Moody's, Fitch, or Standard and Poor's. The investment manager shall immediately alert BBTI staff when any security held in the portfolio is downgraded below the limits permitted by the *Investment Guidelines* and shall outline in writing the course of action anticipated for that security.
 - d. Rate of Return — The rate of return should exceed by not less than 0.25 percent per annum (gross) the performance of the Merrill Lynch 6-Month Treasury Bill Index, achieve positive returns for all rolling three-month periods, and the Fund should achieve first-quartile returns in a universe of comparably managed accounts over any five-year period.
2. Community Development Investment Fund
- a. Investment Universe — Investments shall be in established vehicles that in turn use the funds to assist with the credit, housing, and economic development needs of low- and moderate-income communities.
 - b. Asset Mix — Investments will remain 100 percent invested in community-focused investments, except that contributions will accumulate as cash until they are added to existing notes.
 - c. Rate of Return — Each note shall carry a fixed interest rate.
3. Bond Fund with Treasuries (active duration)
- a. Investment Universe — Investments shall be in securities issued by the U.S. Treasury or an agency or instrumentality of the U.S. government; corporate bonds; guaranteed investment contracts; publicly-issued, SEC-registered, dollar-denominated non-convertible bonds issued by entities not domiciled or headquartered in the U.S. (including corporate, sovereign, supranational, and quasi-government agency bonds); corporate bonds denominated in foreign currencies; asset-backed securities; mortgage-backed securities; collateralized mortgage obligations; commercial paper issued by U.S. corporations; certificates of deposit or bankers' acceptances of U.S. banks; and cash equivalents.
 - b. Asset Mix — Not more than 10 percent of the assets shall be invested in municipal bonds. Not more than 10 percent of the assets shall be invested in publicly-issued, SEC-registered, dollar-denominated, non-convertible bonds issued by entities not domiciled or headquartered in the U.S. (including corporate, sovereign, supranational, and quasi-government agency bonds).
 - c. Duration — The duration of the portfolio shall be within 30 percent of the duration of the Barclays Capital U.S. Government/Credit Bond Index.
 - d. Quality — All assets shall be invested in securities that are investment grade by Moody's, Fitch, or Standard and Poor's. The investment manager shall immediately alert BBTI staff when any security held in the portfolio is downgraded below the limits permitted by the *Investment Guidelines* and shall outline in writing the course of action anticipated for that security.
 - e. Rate of Return — The rate of return should exceed by not less than 0.5 percent per annum (gross) the performance of the Barclays Capital U.S. Government/Credit Bond Index, and the Fund should achieve first-quartile returns in a universe of comparably managed accounts over any five-year period.

4. Bond Fund with Treasuries (duration neutral)

- a. Investment Universe — Investments shall be in securities issued by the U.S. Treasury or an agency or instrumentality of the U.S. government; corporate bonds; guaranteed investment contracts; publicly-issued, SEC-registered, dollar-denominated, non-convertible bonds issued by entities not domiciled or headquartered in the U.S. (including corporate, sovereign, supranational, and quasi-government agency bonds); corporate bonds denominated in foreign currencies; asset-backed securities; mortgage-backed securities; collateralized mortgage obligations; commercial paper issued by U.S. corporations; certificates of deposit or bankers' acceptances of U.S. banks; and cash equivalents.
- b. Asset Mix — Not more than 10 percent of the assets shall be invested in municipal bonds. Not more than 10 percent of the assets shall be invested in convertible bonds. Not more than 10 percent of the assets shall be invested in publicly-issued, SEC-registered, dollar-denominated, non-convertible bonds issued by entities not domiciled or headquartered in the U.S. (including corporate, sovereign, supranational, and quasi-government agency bonds).
- c. Duration — The duration of the portfolio shall be within 15 percent of the duration of the Barclays Capital U.S. Government/Credit Bond Index.
- d. Quality — All assets shall be invested in securities that are investment grade by Moody's, Fitch, or Standard and Poor's. The investment manager shall immediately alert BBTI staff when any security held in the portfolio is downgraded below the limits permitted by the *Investment Guidelines* and shall outline in writing the course of action anticipated for that security.
- e. Rate of Return — The rate of return should exceed by not less than 0.5 percent per annum (gross) the performance of the Barclays Capital U.S. Government/Credit Bond Index, and the Fund should achieve first-quartile returns in a universe of comparably managed accounts over any five-year period.

5. Treasury-Free Bond Fund (active duration)

- a. Investment Universe — Investments shall be in securities issued by an agency or instrumentality of the U.S. government; corporate bonds; guaranteed investment contracts; publicly-issued, SEC-registered, dollar-denominated, non-convertible bonds issued by entities not domiciled or headquartered in the U.S. (including corporate, sovereign, supranational, and quasi-government agency bonds); corporate bonds denominated in foreign currencies; asset-backed securities; mortgage-backed securities; collateralized mortgage obligations; commercial paper issued by U.S. corporations; certificates of deposit or bankers' acceptances of U.S. banks; and cash equivalents.
- b. Asset Mix — Not more than 10 percent of the assets shall be invested in municipal bonds. Not more than 10 percent of the assets shall be invested in publicly-issued, SEC-registered, dollar-denominated, non-convertible bonds issued by entities not domiciled or headquartered in the U.S. (including corporate, sovereign, supranational, and quasi-government agency bonds).
- c. Duration — The duration of the portfolio shall be within 30 percent of the duration of the Barclays Capital U.S. Government/Credit Bond Index.
- d. Quality — All assets shall be invested in securities that are rated investment grade by Moody's, Fitch, or Standard and Poor's. The investment manager shall immediately alert

BBTI staff when any security held in the portfolio is downgraded below the limits permitted by the *Investment Guidelines* and shall outline in writing the course of action anticipated for that security.

- e. Rate of Return — The rate of return should exceed by not less than 0.5 percent per annum (gross) the performance of the Barclays Capital U.S. Government/Credit Bond Index, and the Fund should achieve first-quartile returns in a universe of comparably managed accounts over any five-year period.
6. Treasury-Free Bond Fund (duration neutral)
- a. Investment Universe — Investments shall be in securities issued by an agency or instrumentality of the U.S. government; corporate bonds; guaranteed investment contracts; publicly-issued, SEC-registered, dollar-denominated, non-convertible bonds issued by entities not domiciled or headquartered in the U.S. (including corporate, sovereign, supranational, and quasi-government agency bonds); corporate bonds denominated in foreign currencies; asset-backed securities; mortgage-backed securities; collateralized mortgage obligations; commercial paper issued by U.S. corporations certificates of deposit or bankers' acceptances of U.S. banks; and cash equivalents.
 - b. Asset Mix — Not more than 10 percent of the assets shall be invested in municipal bonds. Not more than 10 percent of the assets shall be invested in convertible bonds. Not more than 10 percent of the assets shall be invested in publicly-issued, SEC-registered, dollar-denominated, non-convertible bonds issued by entities not domiciled or headquartered in the U.S. (including corporate, sovereign, supranational, and quasi-government agency bonds).
 - c. Duration — The duration of the portfolio shall be within 15 percent of the duration of the Barclays Capital U.S. Government/Credit Bond Index.
 - d. Quality — All assets shall be invested in securities that are rated investment grade by Moody's, Fitch, or Standard and Poor's. The investment manager shall immediately alert BBTI staff when any security held in the portfolio is downgraded below the limits permitted by the *Investment Guidelines* and shall outline in writing the course of action anticipated for that security.
 - e. Rate of Return — The rate of return should exceed by not less than 0.5 percent per annum (gross) the performance of the Barclays Capital U.S. Government/Credit Bond Index, and the Fund should achieve first-quartile returns in a universe of comparably managed accounts over any five-year period.
7. Treasury Inflation-Protected Securities Fund
- a. Investment Universe — Investments will be made in a fund vehicle that cost-effectively gains access to inflation-based securities.
 - b. Asset Mix — The Fund is expected to follow its prospectus or legal documentation.
 - c. Rate of Return — The rate of return should meet or exceed the Barclays Capital U.S.TIPS Index, and the Fund should achieve first-quartile returns in a universe of comparably managed funds over any five-year period.
8. Bank Loans Fund.
- a. Investment Universe — Investments will be made in a fund vehicle that cost-effectively gains access to the bank loan marketplace.

- b. Asset Mix — The Fund is expected to follow its prospectus or legal documentation.
 - e. Rate of Return — The rate of return should meet or exceed the S&P/LSTA U.S. Leveraged Loan 100 Index, and the Fund should achieve first-quartile returns in a universe of comparably managed funds over any five-year period.
9. High Yield Bond Fund
- a. Investment Universe — Investments will be made in a fund vehicle that cost-effectively gains access to below-investment grade fixed income securities.
 - b. Asset Mix — The Fund is expected to follow its prospectus or legal documentation.
 - c. Rate of Return — The rate of return should meet or exceed the Barclays Capital U.S. Corporate High Yield Index, and the Fund should achieve first-quartile returns in a universe of comparably managed funds over any five-year period.
10. Global Aggregate Fixed Income Fund
- a. Investment Universe — Investments will be made in a fund vehicle that cost-effectively gains access to the global bond market.
 - b. Asset Mix — The Fund is expected to follow its prospectus or legal documentation.
 - c. Rate of Return — The rate of return should meet or exceed the Barclays Capital Global Aggregate Bond Index, and the Fund should achieve first-quartile returns in a universe of comparably managed funds over any five-year period.
11. Global Inflation Protection Fund
- a. Investment Universe — Investments will be made in a fund vehicle that cost-effectively gains access to securities selected to protect against inflation.
 - b. Asset Mix — The Fund is expected to follow its prospectus or legal documentation.
 - c. Rate of Return — The rate of return should meet or exceed the Consumer Price Index plus 5 percent and the Fund should achieve first-quartile returns in a universe of comparably managed funds over any five-year period.
12. SRI Balanced Fund
- a. Investment Universe — Investments shall be in a mix of several asset categories that may include domestic common stocks, including American Depositary Receipts of non-U.S. corporations; international common stocks; currency futures; forwards or options; securities issued by an agency or instrumentality of the U.S. government; corporate bonds; guaranteed investment contracts; publicly-issued, SEC-registered, dollar-denominated, non-convertible bonds issued by entities not domiciled or headquartered in the U.S. (including corporate, sovereign, supranational, and quasi-government agency bonds); corporate bonds denominated in foreign currencies; asset-backed securities; mortgage-backed securities; collateralized mortgage obligations; commercial paper issued by U.S. corporations; certificates of deposit or bankers' acceptances of U.S. banks; and short-term money market instruments.
 - b. Asset Mix — Not less than 30 percent nor more than 70 percent of the market value of assets shall be invested in domestic common stocks, including American Depositary

Receipts of non-U.S. corporations, international common stocks, and/or securities convertible into common stock; and not less than 30 percent nor more than 70 percent of the market value of assets shall be invested in fixed income instruments with the balance of the assets in cash equivalents.

- c. Rate of Return — The Fund should achieve first-quartile returns in a universe of comparably managed funds over any five-year period. The benchmark comparison will be a weighting of the S&P 500 and the Barclays Capital U.S. Government/Credit Bond Index that matches the asset allocation of the Fund.

13. Balanced Fund

- a. Investment Universe — Investments shall be in a mix of several asset categories that may include domestic common stocks, including American Depositary Receipts of non-U.S. corporations; international common stocks; currency futures; forwards or options; securities issued by the U.S. Treasury or any agency or instrumentality of the U.S. government; corporate bonds; guaranteed investment contracts; publicly-issued, SEC-registered, dollar-denominated, non-convertible bonds issued by entities not domiciled or headquartered in the U.S. (including corporate, sovereign, supranational, and quasi-government agency bonds); corporate bonds denominated in foreign currencies; asset-backed securities; mortgage-backed securities; collateralized mortgage obligations; commercial paper issued by U.S. corporations; certificates of deposit or bankers' acceptances of U.S. banks; and short-term money market instruments.
- b. Asset Mix — Not less than 30 percent nor more than 70 percent of the market value of assets shall be invested in domestic common stocks, including American Depositary Receipts of non-U.S. corporations, international common stocks, and/or securities convertible into common stock; and not less than 30 percent nor more than 70 percent of the market value of assets shall be invested in fixed income instruments with the balance of the assets in cash equivalents.
- f. Rate of Return — The Fund should achieve first-quartile returns in a universe of comparably managed funds over any five-year period. The benchmark comparison will be a weighting of the S&P 500 and the Barclays Capital U.S. Government/Credit Bond Index that matches the asset allocation of the Fund.

14. Target Date Funds

- a. Target Date Fund 2015
 - i. Investment Universe — Investments shall be in a mix of several asset categories that may include domestic common stocks, including American Depositary Receipts of non-U.S. corporations; international common stocks; currency futures; forwards or options; securities issued by an agency or instrumentality of the U.S. government; corporate bonds; guaranteed investment contracts; publicly-issued, SEC-registered, dollar-denominated, non-convertible bonds issued by entities not domiciled or headquartered in the U.S. (including corporate, sovereign, supranational, and quasi-government agency bonds); corporate bonds denominated in foreign currencies; asset-backed securities; mortgage-backed securities; collateralized mortgage obligations; commercial paper issued by U.S. corporations; certificates of deposit or bankers' acceptances of U.S. banks; short-term money market instruments, real estate, and commodities or commodity based-companies.
 - ii. Asset Mix — The asset allocation range for each Target Date Fund is expected to follow the glide path established by the Board upon recommendation of its Investment Committee.

The target asset allocation of the Fund will change at least once on an annual basis and within the target asset allocation ranges approved by the Board.

- iii. Rate of Return — The rate of return should exceed by not less than 0.5 percent per annum (gross) the performance of the benchmark, which will be a weighting of the following indexes that match the target asset allocation of the annual glide path of the Fund —

Barclays Capital U.S. Government/Credit Bond Index
MSCI All Country World Index (Net)
CPI + 5%

In addition, the Fund should achieve first-quartile returns in a universe of comparably managed accounts over any five-year period.

b. Target Date Fund 2025

- i. Investment Universe — Investments shall be in a mix of several asset categories that may include domestic common stocks, including American Depositary Receipts of non-U.S. corporations; international common stocks; currency futures; forwards or options; securities issued by an agency or instrumentality of the U.S. government; corporate bonds; guaranteed investment contracts; publicly-issued, SEC-registered, dollar-denominated, non-convertible bonds issued by entities not domiciled or headquartered in the U.S. (including corporate, sovereign, supranational, and quasi-government agency bonds); corporate bonds denominated in foreign currencies; asset-backed securities; mortgage-backed securities; collateralized mortgage obligations; commercial paper issued by U.S. corporations; certificates of deposit or bankers' acceptances of U.S. banks; short-term money market instruments, real estate, and commodities or commodity based-companies.
- ii. Asset Mix — The asset allocation range for each Target Date Fund is expected to follow the glide path established by the Board upon recommendation of its Investment Committee.

The target asset allocation of the Fund will change at least once on an annual basis and within the target asset allocation ranges approved by the Board.

- iii. Rate of Return — The rate of return should exceed by not less than 0.5 percent per annum (gross) the performance of the benchmark, which will be a weighting of the following indexes that match the target asset allocation of the annual glide path of the Fund —

Barclays Capital U.S. Government/Credit Bond Index
MSCI All Country World Index (Net)
CPI + 5%

In addition, the Fund should achieve first-quartile returns in a universe of comparably managed accounts over any five-year period.

c. Target Date Fund 2035

- i. Investment Universe — Investments shall be in a mix of several asset categories that may include domestic common stocks, including American Depositary Receipts of non-U.S. corporations; international common stocks; currency futures; forwards or options; securities issued by an agency or instrumentality of the U.S. government;

corporate bonds; guaranteed investment contracts; publicly-issued, SEC-registered, dollar-denominated, non-convertible bonds issued by entities not domiciled or headquartered in the U.S. (including corporate, sovereign, supranational, and quasi-government agency bonds); corporate bonds denominated in foreign currencies; asset-backed securities; mortgage-backed securities; collateralized mortgage obligations; commercial paper issued by U.S. corporations; certificates of deposit or bankers' acceptances of U.S. banks; short-term money market instruments, real estate, and commodities or commodity based-companies.

- ii. Asset Mix — The asset allocation range for each Target Date Fund is expected to follow the glide path established by the Board upon recommendation of its Investment Committee.

The target asset allocation of the Fund will change at least once on an annual basis and within the target asset allocation ranges approved by the Board.

- iii. Rate of Return — The rate of return should exceed by not less than 0.5 percent per annum (gross) the performance of the benchmark, which will be a weighting of the following indexes that match the target asset allocation of the annual glide path of the Fund —

Barclays Capital U.S. Government/Credit Bond Index
MSCI All Country World Index (Net)
CPI + 5%

In addition, the Fund should achieve first-quartile returns in a universe of comparably managed accounts over any five-year period.

d. Target Date Fund 2045

- i. Investment Universe — Investments shall be in a mix of several asset categories that may include domestic common stocks, including American Depositary Receipts of non-U.S. corporations; international common stocks; currency futures; forwards or options; securities issued by an agency or instrumentality of the U.S. government; corporate bonds; guaranteed investment contracts; publicly-issued, SEC-registered, dollar-denominated, non-convertible bonds issued by entities not domiciled or headquartered in the U.S. (including corporate, sovereign, supranational, and quasi-government agency bonds); corporate bonds denominated in foreign currencies; asset-backed securities; mortgage-backed securities; collateralized mortgage obligations; commercial paper issued by U.S. corporations; certificates of deposit or bankers' acceptances of U.S. banks; short-term money market instruments, real estate, and commodities or commodity based-companies.
- ii. Asset Mix — The asset allocation range for each Target Date Fund is expected to follow the glide path established by the Board upon recommendation of its Investment Committee.

The target asset allocation of the Fund will change at least once on an annual basis and within the target asset allocation ranges approved by the Board.

- iii. Rate of Return — The rate of return should exceed by not less than 0.5 percent per annum (gross) the performance of the benchmark, which will be a weighting of the following indexes that match the target asset allocation of the annual glide path of the Fund —

Barclays Capital U.S. Government/Credit Bond Index
MSCI All Country World Index (Net)
CPI + 5%

In addition, the Fund should achieve first-quartile returns in a universe of comparably managed accounts over any five-year period.

e. Target Date Fund 2055

- i. Investment Universe — Investments shall be in a mix of several asset categories that may include domestic common stocks, including American Depositary Receipts of non-U.S. corporations; international common stocks; currency futures; forwards or options; securities issued by an agency or instrumentality of the U.S. government; corporate bonds; guaranteed investment contracts; publicly-issued, SEC-registered, dollar-denominated, non-convertible bonds issued by entities not domiciled or headquartered in the U.S. (including corporate, sovereign, supranational, and quasi-government agency bonds); corporate bonds denominated in foreign currencies; asset-backed securities; mortgage-backed securities; collateralized mortgage obligations; commercial paper issued by U.S. corporations; certificates of deposit or bankers' acceptances of U.S. banks; short-term money market instruments, real estate, and commodities or commodity based-companies.
- ii. Asset Mix — The asset allocation range for each Target Date Fund is expected to follow the glide path established by the Board upon recommendation of its Investment Committee.

The target asset allocation of the Fund will change at least once on an annual basis and within the target asset allocation ranges approved by the Board.

- iii. Rate of Return — The rate of return should exceed by not less than 0.5 percent per annum (gross) the performance of the benchmark, which will be a weighting of the following indexes that match the target asset allocation of the annual glide path of the Fund —

Barclays Capital U.S. Government/Credit Bond Index
MSCI All Country World Index (Net)
CPI + 5%

In addition, the Fund should achieve first-quartile returns in a universe of comparably managed accounts over any five-year period.

14. Multi-Strategy Hedge Fund

- a. Investment Universe — Investments will be made in a fund vehicle that cost-effectively gains access to a diverse set of asset classes and investment strategies.
- b. Asset Mix — The Fund is expected to follow its prospectus or legal documentation.
- c. Rate of Return — The rate of return should meet or exceed a benchmark comparison, which will be a composite index consisting of a 60 percent weighting of the S&P 500 Index and a 40 percent weighting of the Barclays Capital U.S. Aggregate Bond Index.

15. Domestic Stock Large Cap Core Index Fund.

- a. Investment Universe — Investments shall be in domestic common stocks that match in name those in the S&P 500 Index minus the companies that are not in compliance with BBTI's socially responsible investing guidelines.
- b. Asset Mix — The asset allocation will be proportional to the holdings in the S&P 500 Index minus the companies that are not in compliance with BBTI's socially responsible investing guidelines. A minimal cash position may be held for liquidity purposes.
- c. Rate of Return — The rate of return may be the S&P 500 Index return plus or minus the forward estimated tracking error.

16. Domestic Stock Large Cap Core Fund.

- a. Investment Universe — Investments shall be in domestic common stocks, including American Depositary Receipts of non-U.S. corporations, and cash equivalents.
- b. Asset Mix — Not less than 80 percent of the assets shall at all times be invested in domestic common stocks, including American Depositary Receipts of non-U.S. corporations, and/or securities convertible into common stock, with the balance in cash equivalents. No more than 20 percent of the assets may be invested in American Depositary Receipts of non-U.S. corporations.
- c. Rate of Return — The rate of return should exceed by not less than 1 percent per annum (gross) the performance of the S&P 500 Index, and the Fund should achieve first-quartile returns in a universe of comparably managed accounts over any five-year period.

17. Domestic Stock Mid Cap Fund

- a. Investment Universe — Investments shall be in domestic common stocks, including American Depositary Receipts of non-U.S. corporations and cash equivalents. Investments shall be made only in corporations with total market capitalizations that are no smaller at the time of purchase than the smallest market capitalized firm that is in the Fund's benchmark at its most recent reconstitution and no larger than 1.5 times the largest market capitalized firm that is in the Fund's benchmark at its most recent reconstitution. Any exception must be approved by the President, in writing and reported to the Investment Committee at the next meeting.
- b. Asset Mix — Not less than 80 percent of the assets shall at all times be invested in domestic common stocks, including American Depositary Receipts of non-U.S. corporations, and/or securities convertible into common stock, with the balance in cash equivalents. No more than 10 percent of the assets may be invested in American Depositary Receipts of non-U.S. corporations.
- c. Rate of Return — The rate of return should exceed by not less than 1 percent per annum (gross) the performance of the Russell Midcap Index, and the Fund should achieve first-quartile returns in a universe of comparably managed accounts over any five-year period.

18. Domestic Stock Growth Fund

- a. Investment Universe — Investments shall be in domestic growth common stocks, including American Depositary Receipts of non-U.S. corporations, and cash equivalents.
- b. Asset Mix — Not less than 80 percent of the assets shall at all times be invested in domestic common stocks, including American Depositary Receipts of non-U.S. corporations, and/or securities convertible into common stock, with the balance in cash

equivalents. No more than 10 percent of the assets may be invested in American Depositary Receipts of non-U.S. corporations.

- c. Rate of Return — The rate of return should exceed by not less than 1 percent per annum (gross) the performance of the Russell 1000 Growth Index, and the Fund should achieve first-quartile returns in a universe of comparably managed accounts over any five-year period.

19. Common Stock Fund

- a. Investment Universe — Investments shall be in domestic common stocks, including American Depositary Receipts of non-U.S. corporations; international common stocks; and cash equivalents.
- b. Asset Mix — Not less than 80 percent of the assets shall at all times be invested in common stocks, including American Depositary Receipts of non-U.S. corporations, and/or securities convertible into common stock, with the balance in cash equivalents. No more than 20 percent of the assets shall be invested in American Depositary Receipts of non-U.S. corporations.
- c. Rate of Return — The rate of return should exceed by not less than 1 percent per annum (gross) the performance of the S&P 500 Index, and the Fund should achieve first-quartile returns in a universe of comparably managed accounts over any five-year period.

20. Small Cap Fund

- a. Investment Universe — Investments shall be in domestic common stocks, including American Depositary Receipts of non-U.S. corporations, and cash equivalents. Investments shall be made only in corporations with total market capitalizations that are no greater at the time of purchase than 1.5 times the largest market capitalized firm that is in the Fund's benchmark at its most recent reconstitution. Any exception must be approved by the President, in writing and reported to the Investment Committee at the next meeting.
- b. Asset Mix — Not less than 80 percent of the assets shall at all times be invested in common stocks, including American Depositary Receipts of non-U.S. corporations, and/or securities convertible into domestic common stock, with the balance in cash equivalents. No more than 10 percent of the assets may be invested in American Depositary Receipts of non-U.S. corporations.
- c. Rate of Return — The rate of return should exceed by not less than 1 percent per annum (gross) the performance of the Russell 2000 Index, and the Fund should achieve first-quartile returns in a universe of comparably managed accounts over any five-year period.

21. International Stock Core Fund

- a. Investment Universe — Investments shall be primarily in international common stocks, including American Depositary Receipts of non-U.S. corporations, and cash equivalents. In addition, currency futures, forwards, or options may be purchased to hedge currency fluctuations.
- b. Asset Mix — Not less than 80 percent of the assets shall at all times be invested in international common stocks, including American Depositary Receipts of non-U.S. corporations, and/or securities convertible into international common stock, with the balance in cash equivalents.

- c. Rate of Return — The rate of return should exceed by not less than 1 percent per annum (gross) the performance of the MSCI EAFE (Net), and the Fund should achieve first-quartile returns in a universe of comparably managed accounts over any five-year period.

22. Emerging Markets Stock Fund

- a. Investment Universe — Investments will be made in a fund vehicle that cost-effectively gains access to securities that are predominantly domiciled in the emerging markets.
- b. Asset Mix — The Fund is expected to follow its prospectus or legal documentation.
- c. Rate of Return — The rate of return should meet or exceed the MSCI Emerging Markets Index (Net), and the Fund should achieve first-quartile returns in a universe of comparably managed funds over any five-year period.

23. Public Real Estate Fund

- a. Investment Universe — Investments will be made in a fund vehicle that cost-effectively gains access to predominantly publicly traded real estate investment trust securities.
- b. Asset Mix — The Fund is expected to follow its prospectus or legal documentation.
- c. Rate of Return — The rate of return should meet or exceed the S&P Developed Property Index, and the Fund should achieve first-quartile returns in a universe of comparably managed funds over any five-year period.

24. Commodities-Based Fund

- a. Investment Universe — Investments will be made in a fund vehicle that cost-effectively gains access to an investment strategy that has low U.S. equity correlation and predominantly invests in commodities or commodity-based companies.
- b. Asset Mix — The Fund is expected to follow its prospectus or legal documentation.
- c. Rate of Return — The rate of return should meet or exceed the Bloomberg Commodity Total Return Index, and the Fund should achieve first-quartile returns in a universe of comparably managed funds over any five-year period.

B. Other Funds

1. Capital Development Fund.

- a. Investment Universe — Investments shall be in a mix of several asset categories offered by Brethren Foundation.
- b. Asset Mix — The Fund shall be invested 17.8 percent in the Domestic Stock Core Fund, 17.8 percent in the Domestic Stock Value Fund, 17.8 percent in the Domestic Stock Growth Fund, 15.6 percent in the Bond Fund, 1 percent in the Community Development Investment Fund, and 30 percent in the Short-Term Fund.
- c. Rate of Return — The Fund should achieve first-quartile returns in a universe of comparably managed funds over any five-year period.

2. Retirement Benefits Fund

- a. Investment Universe — Investments shall be in a mix of several asset categories that may include domestic common stocks, including American Depositary Receipts of non-U.S. corporations; international common stocks; currency futures; forwards or options; securities issued by the U.S. Treasury or an agency or instrumentality of the U.S. government; corporate bonds; guaranteed investment contracts; publicly-issued, SEC-registered, dollar-denominated, non-convertible bonds issued by entities not domiciled or headquartered in the U.S. (including corporate, sovereign, supranational, and quasi-government agency bonds); corporate bonds denominated in foreign currencies; asset-backed securities; mortgage-backed securities; collateralized mortgage obligations; commercial paper issued by U.S. corporations; certificates of deposit or bankers' acceptances of U.S. banks; and short-term money market instruments.
 - b. Asset Mix — Not less than 30 percent nor more than 70 percent of the market value of assets shall be invested in common stocks, including American Depositary Receipts of non-U.S. corporations, and not less than 30 percent nor more than 70 percent of the market value of assets shall be invested in fixed income instruments with the balance of the assets in cash equivalents. Not more than 15 percent shall be in alternative asset classes.
 - c. Rate of Return — The Fund should achieve first-quartile returns in a universe of comparably managed funds over any five-year period.
3. Church Workers' Assistance Plan Fund
 - a. Investment Universe — Investments shall be in a mix of several asset categories offered by Brethren Foundation.
 - b. Asset Mix — The Fund shall be invested 95 percent in the BFI Balanced Fund and 5 percent in the International Stock Core Fund.
 - c. Rate of Return — The Fund should achieve first-quartile returns in a universe of comparably managed funds over any five-year period.
 4. Supplemental Income Fund for Equitable Annuitants
 - a. Investment Universe — Investments shall be in a mix of several asset categories offered by Brethren Foundation.
 - b. Asset Mix — The Fund shall be invested 100 percent in the BFI Balanced Fund.
 - c. Rate of Return — The Fund should achieve first-quartile returns in a universe of comparably managed funds over any five-year period.
 5. Medical Plan Reserve Fund
 - a. Investment Universe — Investments shall be in a mix of several asset categories offered by Brethren Foundation.
 - b. Asset Mix — The Fund shall be invested 100 percent in the BFI Short-Term Fund.
 - c. Rate of Return — The Fund should achieve first-quartile returns in a universe of comparably managed funds over any five-year period.
 6. Long-Term Disability Plan Reserve Fund

- a. Investment Universe — Investments shall be in a mix of several asset categories offered by Brethren Foundation.
- b. Asset Mix — The Fund shall be invested 100 percent in the BFI Balanced Fund.
- c. Rate of Return — The Fund should achieve first-quartile returns in a universe of comparably managed funds over any five-year period.

III. Separate Account Manager Responsibilities

Each investment manager is responsible for frequent and open communication with staff and the Committee on all significant matters pertaining to investment policy and the management of the portfolio's assets, including but not limited to —

- Major changes in the investment manager's investment outlook, investment strategy, and portfolio structure.
- Any significant changes in the ownership, organizational structure, financial conditions, or senior personnel staffing.
- Transactions, valuations, and quarterly performance reports that shall be sent to the BBTI staff or its designates.
- Meet with staff in person no less than annually and no less than quarterly via conference calls.
- Provide the Committee a thorough, in-person review upon request, but typically every three years.

There may be instances when a Fund may be unable to utilize a separate account structure due to minimum funding requirements. In those instances, it may not be possible to strictly implement these *Investment Guidelines*. It is anticipated that once an appropriate level of assets is reached in each Fund, a separate account shall be implemented.

IV. Proxy Voting

The Committee recognizes that proxies are assets of BBTI. The Committee has determined that staff and an external organization (identified in the addendum) are responsible for voting the proxies. Periodically, the Committee will review the specific voting records. Voting will be consistent with guidelines outlined under Section I.H.

V. Liquidity Fund

The Committee has authorized a short-term investment fund where temporary cash would be swept on a daily basis by the operating account bank (identified in the addendum). The Committee will review this Fund on a periodic basis to ensure it best meets BBTI's needs. To the extent possible, holdings in the liquidity fund will comply with the ethical and social responsibility guidelines outlined in Section I.H.

Church of the Brethren Benefit Trust Inc.
1505 Dundee Ave., Elgin IL 60120
847-695-0200 or 800-746-1505

ADDENDUM

Fund — Investment Managers (Style)

Short-Term Fund with Treasuries — Ponder Investment Co.

Performance benchmark: Merrill Lynch 6-Month Treasury Bill Index

Community Development Investment Fund — Calvert Foundation

Bond Fund with Treasuries — Agincourt Capital Management LLC (active duration)

Income Research & Management Inc. (duration neutral)

Performance benchmark: Barclays Capital U.S. Government/Credit Bond Index

Treasury-Free Bond Fund — Agincourt Capital Management LLC (active duration)

Income Research & Management Inc. (duration neutral)

Performance benchmark: Barclays Capital U.S. Government/Credit Bond Index

Treasury Inflation-Protected Securities Fund* — Vanguard Inflation-Protected Securities Fund Admiral Shares (VAIPX)

Performance benchmark: Barclays Capital U.S. TIPS Index

Bank Loans Fund* — Eaton Vance Floating-Rate Fund Class I (EIBLX)

Performance benchmark: S&P/LSTA U.S. Leveraged Loan 100 Index

High Yield Bond Fund* — Principal High Yield Fund Institutional Class (PHYTX)

Performance benchmark: Barclays Capital U.S. Corporate High Yield Bond Index

Global Aggregate Fixed Income Fund* — Templeton Global Bond Fund Class R6 (FBNRX)

Performance benchmark: Barclays Capital Global Aggregate Bond Index

Global Inflation Protection Fund* - PIMCO All Asset Fund Institutional Class (PAAIX)

Performance benchmark: Consumer Price Index plus 5 percent

SRI Balanced Fund — Common Stock Fund

Bond Fund without Treasuries

Performance benchmark: weighting of the S&P 500 and the Barclays Capital U.S. Government/Credit Bond Index that matches the asset allocation of the Fund

Balanced Fund — Common Stock Fund

Bond Fund with Treasuries

Performance benchmark: weighting of the S&P 500 and the Barclays Capital U.S. Government/Credit Bond Index that matches the asset allocation of the Fund

Target Date Fund 2015 — Marquette Associates Fiduciary Services (Fund of BBTI Funds)

Performance benchmark: weighting of the following indexes that match the target asset allocation of the annual glide path of the Fund —

Barclays Capital U.S. Government/Credit Bond Index

MSCI All Country World Index (Net)

CPI + 5%

Target Date Fund 2025 — Marquette Associates Fiduciary Services (Fund of BBTI Funds)

Performance benchmark: weighting of the following indexes that match the target asset allocation of the annual glide path of the Fund —

Barclays Capital U.S. Government/Credit Bond Index
MSCI All Country World Index (Net)
CPI + 5%

Target Date Fund 2035 — Marquette Associates Fiduciary Services (Fund of BBTI Funds)
Performance benchmark: weighting of the following indexes that match the target asset allocation of the annual glide path of the Fund —

Barclays Capital U.S. Government/Credit Bond Index
MSCI All Country World Index (Net)
CPI + 5%

Target Date Fund 2045 — Marquette Associates Fiduciary Services (Fund of BBTI Funds)
Performance benchmark: weighting of the following indexes that match the target asset allocation of the annual glide path of the Fund —

Barclays Capital U.S. Government/Credit Bond Index
MSCI All Country World Index (Net)
CPI + 5%

Target Date Fund 2055 — Marquette Associates Fiduciary Services (Fund of BBTI Funds)
Performance benchmark: weighting of the following indexes that match the target asset allocation of the annual glide path of the Fund —

Barclays Capital U.S. Government/Credit Bond Index
MSCI All Country World Index (Net)
CPI + 5%

Multi-Strategy Hedge Fund* — PIMCO All Asset All Authority Fund Institutional Class (PAUIX)
Performance benchmark: 60 percent weighting of the S&P 500 Index and a 40 percent weighting of the Barclays Capital U.S. Aggregate Bond Index

Domestic Stock Large Cap Core Index Fund — Capstone Asset Management Company
Performance benchmark: S&P 500 Index

Domestic Stock Large Cap Core Fund — Numeric Investors LLC
Performance benchmark: S&P 500 Index

Domestic Stock Mid Cap Fund — Iridian Asset Management LLC
Performance benchmark: Russell Midcap Index

Domestic Stock Growth Fund — Segall Bryant & Hamill Investment Counsel
Performance benchmark: Russell 1000 Growth Index

Common Stock Fund — Numeric Investors LLC (domestic core)
Capstone Asset Management Company (domestic core index)
Iridian Asset Management LLC (domestic mid cap)
Segall Bryant & Hamill Investment Counsel (domestic growth)
Kayne Anderson Rudnick Investment Management LLC (domestic small cap)
Boston Common Asset Management LLC (international core)
Performance benchmark: S&P 500 Index

Small Cap Fund — Kayne Anderson Rudnick Investment Management LLC
Performance benchmark: Russell 2000 Index

International Stock Core Fund — Boston Common Asset Management LLC

Performance benchmark: MSCI EAFE Index (Net)

Emerging Markets Stock Fund* — DFA Emerging Markets Value Portfolio Institutional Class (DFEVX)
Performance benchmark: MSCI Emerging Markets Index (Net)

Public Real Estate Fund* — Voya Global Real Estate Fund Class R6 (VGRQX)
Performance benchmark: S&P Developed Property Index

Commodities-Based Fund* — PIMCO CommodityRealReturn Strategy Institutional Class (PCRIX)
Performance benchmark: Bloomberg Commodity Total Return Index

** Denotes mutual fund*

Additional Service Providers

J.P. Morgan Chase & Co. — Liquidity fund

Nottingham Investment Administration — Reconciliation agent

RiskMetrics Group Inc. — Proxy voting

U.S. Bank N.A. — Custodian