
The Ministry Fund Investment Policy

The Ministry Fund, LLC. was incorporated to support evangelical ministries and churches with the objective of advancing the gospel of Jesus Christ. Ministry Trust manages endowments, charitable funds, designated accounts, and planned gifts through prudent, dependable, and competitive fiduciary services consistent with the highest ideals of Christian stewardship.

Scope of this Investment Policy

This document establishes the Investment Policy for Ministry Trust and is designed to assist in effectively supervising, monitoring, and evaluating the investment of the “Funds” under management. Ministry Trust has arrived at this Investment Policy through careful study of a range of investment strategies in relation to the current and projected distribution requirements of the Funds. This Investment Policy has been chosen as the most appropriate policy for achieving the financial objectives of the Funds which are described in the “Investment Objectives” section of this document; however, Ministry Trust shall be free to deviate from this Investment Policy when it concludes that it is prudent and in the interest of Ministry Trust or the ministries it supports to do so and may amend the Investment Policy at any time.

Ministry Trust has adopted a long-term investment horizon for The Ministry Fund such that the probability and duration of investment losses are carefully weighed against the long-term potential for appreciation of assets.

In addition to the Investment Policy defined herein, the management of the Funds will be in compliance with all applicable laws.

Purpose of Investment Policy

The purpose of this policy is to outline Ministry Trust’s philosophy and worldview that will guide the investment management of the Funds and is set forth by Ministry Trust to:

1. Define and assign the responsibilities of all parties.
2. Establish a clear understanding of Ministry Trust’s general investment objectives and principles.
3. Establish guidelines for investment advisers and managers.

Delegation of Authority

Ministry Trust is the fiduciary and is responsible for directing and monitoring the management of the Funds. The specific responsibilities of Ministry Trust relating to the investment management of the Funds' assets include:

1. Establishing an Investment Policy to oversee the management of the Funds; establishing and reviewing the investment objectives, permitted investments, asset allocations, and risk/reward profile for the Funds;
2. Electing and terminating the relationship with qualified investment professionals to manage the Funds; including Investment Adviser(s), Investment Manager(s), and Custodian(s); establishing the Spending Policy of the Funds.

As such, Ministry Trust is authorized to delegate certain responsibilities. These include:

Investment Consultant

The Investment Consultant's role is to provide guidance to the leadership of Ministry Trust on matters pertaining to the investment of the Funds' assets including investment policy development, asset allocation, investment manager selection and oversight, monitoring the Funds' performance, spending policy distributions, and compliance with the Investment Policy. The Investment Consultant, in carrying out the Investment Policy defined in this document, has authority and responsibility to select appropriate investments in the specific asset classes mandated by this Investment Policy in accordance with the terms of an investment management agreement between Ministry Trust and the Investment Consultant. The Investment Consultant acknowledges its fiduciary status as non-discretionary Investment Consultant. The Investment Consultant acknowledges that it is a co-fiduciary with Ministry Trust with respect to determining asset allocation of the portfolio and selection of the Investment Managers. The Consultant shall not act as co-fiduciary of any managers retained or obtained by Ministry Trust that do not meet the Consultant's compliance requirements.

Investment Managers

The Investment Managers have the discretion to buy, sell, or hold specific securities used to meet the Fund's objectives as well as vote proxies on behalf of Ministry Trust. The Managers should report to the Investment Consultant any major changes to outlook, strategy, or any qualitative change to the Organization (personnel, ownership, philosophy, etc.).

Custodian

The custodian is responsible for the safekeeping of the Funds, and the duties include maintaining separate accounts, providing daily values (whenever possible), collecting dividends and interest, settling all transactions, and providing at least monthly statements.

UPMIFA

Ministry Trust is responsible for managing the investment process in a prudent manner with regard to preserving principal while providing reasonable returns and consistent with the principles articulated in the Uniform Prudent Management of Institutional Funds Act ("UPMIFA") which was enacted in the state of Georgia July 1, 2008. In this regard, Ministry Trust will consider, if relevant, the following factors in managing the Funds:

1. general economic conditions;
2. the possible effect of inflation or deflation;
3. the expected tax consequences, if any, of investment decisions or strategies;
4. the role that each investment or course of action plays within the overall investment portfolio of the Fund;
5. the expected total return from income and the appreciation of investments;
6. other resources of the institution;
7. the needs of the institution and the Fund to make distributions and preserve capital;
8. an asset's special relationship or special value, if any, to the charitable purpose of the institution.

In addition, each person responsible for managing and investing the Funds shall comply with the duty of loyalty imposed by law and manage and invest the Funds in good faith and with the care an ordinary prudent person in a like position would exercise under similar circumstances.

Investment Objectives

The foremost objective is to ensure that investment portfolios overseen by Ministry Trust are managed in a manner that is consistent with the Organization's stated beliefs and values. The Funds' investments will be actively screened and monitored by the Investment Consultant. A list of the portfolios' active social screens including prohibited investments will be maintained in Appendix B.

The investment objective for The Ministry Fund is to provide sufficient cash flow from interest, dividends, and realized or unrealized capital gains to meet the spending policy payout as specified from time to time, and to generate enough additional growth of principal to maintain the purchasing power of the income dollar. The specific performance goal for the Ministry Fund is a portfolio that has a high probability of providing a five-year average return of 7.5% over a full market cycle.

Asset Allocation

The asset allocation within the funds is driven by the overall objective of Ministry Trust, as stated above. Specific equity, fixed income, and alternative investment disciplines that are used in the asset mix, along with the percentage of the portfolio allocated to each, are listed in Appendix A. Such allocations are subject to change upon the recommendation of the Adviser and approval of Ministry Trust.

It will be the responsibility of the Consultant to monitor the balance quarterly and notify the President of Ministry Trust if at any time the portfolio allocations deviate from the policy target allocation ranges listed in Exhibit A. It is recognized that market action may cause an imbalance in the interim period, but such fluctuations are normal and acceptable.

Income Distribution

Ministry Fund

The Ministry Fund shall distribute income based on the Income Spending Policy. The Income Spending Policy payout shall be calculated and distributed as a dividend for each share of the fund. Ministry Trust will review the dividend annually with the intent of increasing the dividend by 3% each year unless the resulting dollar amount is more than 5% or less than 4% of the applicable market value of the fund. The Ministry Trust will review the dividend on a quarterly basis to determine if the dividend remains in the 4%-5% corridor. If the dividend moves outside the corridor in any given quarter, Ministry Trust will adjust the dividend so that it remains within the corridor.

Risk Tolerance and Volatility

The primary measurement of risk will be the standard deviation of average returns. Consistent with the desire for adequate diversification, the Investment Policy is based on the assumption that the volatility (standard deviation) of the combined equity investment will be similar to that of the market opportunity available to institutional investors with similar return objectives. The volatility of fixed income portfolios may be greater than the market during periods when

the portfolio duration exceeds that of the market and/or when alternative income strategies are utilized in the portfolio. The portfolio's risk objective is to maximize returns when adjusting for risk level and should not take inappropriate risks beyond what is necessary to generate the return objective.

Failure to achieve the goal in times of excessive market volatility is not a failure of the strategy, but will trigger an in-depth review and discussion with the Investment Adviser regarding the asset allocation and investment managers to insure that all are performing to expectations and to articulate a forward-looking plan for improvement.

All assets contributed to Ministry Trust shall be disposed of as soon as practical should they not conform to the established guidelines. In extraordinary circumstances, per Ministry Trust approval, assets contributed to Ministry Trust may not be allocated according to Appendix A and will be dealt with on a case-by-case basis.

Investment Guidelines

Equity Manager Guidelines

- I. Cash equivalent holdings in excess of withdrawal needs (approximately 5%) should be avoided. However, managers may increase cash assets in the portfolio if, in their professional judgment, market conditions so warrant. The manager shall inform the Adviser of this decision.
- II. Equity Holdings – Diversification and Quality Criteria
 - A. The market value of any one company holding shall not exceed 10% of the total market value of equities held in the portfolio of a specific manager.
 - B. Each manager's portfolio is expected to be appropriately diversified by industry given the manager's specific asset class and style.
 - C. Securities which are broadly classified as institutional quality issues – regardless of whether or not they are listed on a recognized stock exchange – are eligible for inclusion in the portfolio.
 - D. Convertible issues are suitable for use as investment vehicles if the quality rating conforms to the intent of these guidelines.
- III. Equity Holdings – Turnover

If performance results meet objectives, the rate of turnover will not be a factor in manager evaluation.

- IV. Equity Holdings – Universe: Permitted
 - A. Common stocks;
 - B. Securities convertible into common stock;
 - C. Common stocks of foreign companies, if listed on a major U.S. securities exchange;
 - D. Equity securities of foreign companies listed on any U.S. or foreign securities exchange (applies only to foreign equity managers);
 - E. ADRs, EDRs, and GDRs;
 - F. ETFs;
 - G. REITs;
 - H. Preferred stocks;
- V. Equity Holdings – Universe: Not Permitted
 - A. Short sales;
 - B. Put and Call Options.
 - C. Margin purchases, borrowing, or lending money;
 - D. Letter stock, private placement, or direct placements;
 - E. Commodities or futures of any type;
 - F. Real estate or mortgages, except to the extent directed by Ministry Trust;
 - G. Common stock of foreign companies, except as permitted in Para. 4.e (applies only to domestic equity managers).
- VI. Securities of the investment adviser, investment manager, the custodian, their parent, or subsidiaries are not permitted unless approved in writing by Ministry Trust.
- VII. Performance measurement will include the following:
 - A. Each equity manager will be measured against an appropriate index;
 - B. Each equity manager will be ranked against a universe of managers using the same investment style;
 - C. A list of appropriate equity manager benchmarks will be maintained in Appendix C.

Traditional Fixed Income Manager Guidelines

- I. Fixed Income Holdings – Bond Diversification and Quality Criteria

- A. Marketable issues are desired so that the portfolio can be actively managed;
 - B. Bonds with maturities of one year or more should be of an original issue size in excess of \$50 million;
 - C. Bond holdings are expected to be well diversified across the permitted universe;
 - D. Quality: 90% of the portfolio will be Bank Investment Grade; the remaining 10% must have a Moody's or Standard & Poor's rating no lower than B2 or B.
 - E. The average duration of the portfolio should be +/- 25% of the durations of the benchmark.
- II. Fixed Income Holdings - Turnover
- A. Bonds may be actively managed;
 - B. Active management is meant to include altering the average coupon yields, shifting maturity schedules, "swapping", and such other prudent strategies which enhance the income or quality of the portfolio or decrease the risk.
- III. Fixed Income Holdings - Bond Investment Universe
- A. The following security categories are generally permissible investments for the fixed income portion of the portfolio:
 - B. Debt securities issued or guaranteed by the United States Government or its agencies (including U.S. Government Agency mortgage-backed securities and Small Business Administration securities);
 - C. Corporate bonds, debentures, and other forms of corporate debt obligations, including equipment trust certificates;
 - D. Indexed notes;
 - E. Yankee Bonds;
 - F. Debt securities issued by foreign governments provided they meet the quality criteria of Para. 1;
 - G. U.S. Municipalities;
 - H. AAA - rated Asset Backed Securities are permitted with a maximum duration of 3 years;
 - I. Student Loan backed securities including Sallie Mae bonds are not permitted.
- IV. Cash Equivalent Holdings - Diversification

- A. Excluding debt obligations of the U.S. Government or its agencies, or the Master custodian short-term reserve fund or money market fund, no single issue may exceed 10% of the market value of the total account.
- V. Cash Equivalent Holdings - Universe
 - A. The following short term investment vehicles are acceptable:
 - B. All obligations issued or guaranteed by the U.S. Government or its agencies;
 - C. Commercial paper rated A1 by Standard & Poor's and P1 by Moody's;
 - D. Certificates of Deposit - only of banks or savings and loan institutions with listed deposits in excess of \$500 mm (excluding the custodian bank) in the United States in terms of total assets;
 - E. Custodian bank short term reserve funds which meet the diversification and quality criteria set forth by the Controller of the Currency;
 - F. No-load money market mutual funds;
 - G. Euro-dollar CD's;
 - H. Bankers Acceptances.
- VI. Securities of the Investment Consultant, investment manager, the custodian, their parent, or subsidiaries are not permitted unless approved in writing by Ministry Trust (excluding short term reserve funds and money market funds).
- VII. Performance measurement will include the following:
 - A. Each fixed income manager will be measured against an appropriate index;
 - B. Each fixed income manager will be ranked against a universe of managers using the same investment style;
 - C. A list of the appropriate fixed income manager benchmarks will be maintained in Appendix C.

Alternative Manager Guidelines

The investment objective of the Alternative Manager is to produce returns comparable to those of the equity markets over a full market cycle targeting substantially less volatility (standard deviation) than equities by investing in a concentrated portfolio of long/short hedge funds. The Alternative Fixed Income allocation is expected to include private real estate and private debt investments made through commitments to limited partnership funds dedicated to those asset classes. Real estate investments may include funds pursuing Core and/or Value Add

real estate sub-strategies. Core real estate investments are characterized by stable, well-leased properties in major metropolitan markets and are expected to produce consistent returns primarily through current yield. Value Add real estate may consist of properties primary or secondary metropolitan areas requiring some improvement or repositioning to drive rent increases; Value Add real estate is expected to provide a combination of current income and capital appreciation. Private Debt investments generally consist of directly originated or syndicated senior loans to middle market companies and are backed by the borrower's cash flows and potentially by their hard assets. Private Debt returns are primarily through current income at a premium to traditional fixed income credit yields. Due to the private nature of alternative investments Ministry Trust may be limited in its ability to administer the screening guidelines listed in Appendix B for assets placed with alternative managers.

The Investment Policy was adopted on **February 4th, 2021** and is subject to modification at the discretion of Ministry Trust, LLC.

Appendix A

The Ministry Fund

ASSET CLASS	PERCENTAGE	RANGE
Domestic Large Cap Equity	24%	20%-30%
Domestic Small/Mid Cap Equity	13%	5%-20%
Defensive Equity	15%	0%-20%
Developed International Equity	18%	10% - 25%
Emerging International Equity	5%	0%-10%
Traditional Fixed Income	17%	10%-30%
Alternative Fixed Income	8%	0%-20%

Appendix B

Screening Guidelines

As Christians, we are in the world but not of the world. Our goal as believers is to avoid the things of the world, while knowing that perfect avoidance is impossible until we stand before God.

In the same way, Ministry Trust strives to invest in such a way that we do not profit from the immorality of the world, yet knowing that in the complexities of the world, perfect avoidance is impossible. We commit to using the investment guidelines listed below to generally prohibit stocks and bonds of companies that significantly profit from the immorality of the world.

CATEGORY	SELECTION
Adult Entertainment	10% Revenue Threshold
Gambling	10% Revenue Threshold
ALCOHOL	
Manufacturing/Marketing/Branding	10% Revenue Threshold
Suppliers/Inputs	10% Revenue Threshold
Retailers	10% Revenue Threshold
TOBACCO	
Manufacturing/Branding	10% Revenue Threshold

Supplier	10% Revenue Threshold
Retailers	10% Revenue Threshold
CANNABIS	10% Revenue Threshold
LIFE/CHOICE	
Manufacturing/Marketing/Licensing of Abortifacients or Contraceptives	10% Revenue Threshold
Embryonic Stem Cell Research	10% Revenue Threshold
Abortion Medical Facilities and Providers	Restrict All

Appendix C

Investment Strategy Benchmarks

Equity Benchmarks

1. Large-cap growth managers will be measured against the Russell 1000 Growth Index
2. Large-cap value managers will be measured against the Russell 1000 Value Index
3. Large-cap core managers will be measured against the Russell 1000 Index
4. Small-cap growth managers will be measured against the Russell 2000 Growth Index
5. Small-cap value managers will be measured against the Russell 2000 Value Index
6. Small-cap core managers will be measured against the S&P 600 Index
7. International Developed Equity managers will be measured against the MSCI ACWI ex US Index
8. International Emerging Equity managers will be measured against the MSCI Emerging Markets Index
9. Defensive Equity managers will be measured against an index appropriate for their specific strategies as well as the S&P 500 Index for the allocation as a whole.

Traditional Fixed Income Benchmarks

1. Intermediate Duration Fixed Income manager will be measured against the Barclays US Govt/Credit Index
2. Short Duration Fixed Income managers will be measured against the Barclays 1-3 Year US Treasury Index
3. Dual Mandate Fixed Income portfolio will be measured against a composite index blend of 67% of the Barclays US Govt/Credit Index and 33% of the Barclays 1-3 year US Treasury Index

Alternative Income Benchmarks

1. Real Estate managers will be measured against the NCREIF Property Index
2. Private Debt managers will be measured against the LSTA Leveraged Loan Index