

**STATEMENT OF INVESTMENT POLICY, OBJECTIVES AND SPENDING GUIDELINES
FOR THE WILD CENTER**

THE WILD CENTER

Approved by the Board of Trustees

Date: December 28, 2010

THE WILD CENTER

STATEMENT OF INVESTMENT POLICY & OBJECTIVES

I. SCOPE OF THIS INVESTMENT POLICY STATEMENT

This statement of investment policy reflects the investment policy, objectives, and constraints of The Wild Center Funds, including endowment, restricted, and Board-designated restricted funds but exclusive of Center operating funds. (The assets covered by this Investment Policy will be referred to as “The Wild Center Funds” or the “Funds”.)

II. OBJECTIVE

The primary objective of The Wild Center Funds is preservation of capital adjusted for inflation, with an emphasis on total return in the context of a risk profile generally deemed to be prudent by institutional fiduciaries.

III. PURPOSE OF THIS INVESTMENT POLICY STATEMENT

The Trustees of The Wild Center set forth this Investment Policy Statement in order to:

- Define the responsibilities of all involved parties and assign such responsibilities.
- Establish for all involved parties a clear understanding of the investment goals and objectives of the assets under management.
- Manage Fund assets according to prudent standards.
- Offer guidance and limitations to all Investment Managers/Consultants regarding the investment of the assets.
- Establish a basis for evaluating investment results.
- Establish a relevant investment time horizon for which the assets will be managed.

In general, the purpose of this statement is to outline a philosophy and framework that will guide the investment management of the assets toward the desired results. It is intended to be sufficiently specific to be meaningful, yet flexible enough to be practical.

This policy will be reviewed at least annually to confirm that it continues to meet the needs of the institution and reflects consideration of economic and market conditions. The review will specifically consider target asset allocation guidelines, allowed assets, The Center’s liquidity requirements, and any new or changed risk factors. Risk factors may include, but are not limited to, economic conditions, interest rate risk, market risk, liquidity risk, counter-party or credit risk, operational risk, and legal and regulatory risk.

IV. GENERAL INVESTMENT PRINCIPLES

Management of The Wild Center Funds will follow investment considerations and practices consistent with the New York Prudent Management of Institutional Funds Act (“NYPMIFA”). In making decisions regarding the Funds, The Center will consider:

- general economic conditions;
- the possible effect of inflation or deflation;
- the expected tax consequences, if any, of investment decisions or strategies;
- the role that each investment or course of action plays within the overall investment portfolio of the fund;
- the expected total return from income and the appreciation of investments;
- other resources of The Center;
- the needs of The Center and the fund to make distributions and to preserve capital; and
- an asset’s special relationship or special value, if any, to the purposes of The Center.

In addition, The Center will abide by the following NYPMIFA imposed rules with respect to the management and investment of The Center’s funds, all of which are subject to terms otherwise provided by a gift instrument:

- Management and investment decisions about an individual asset will not be made in isolation, but will be made in the context of The Center’s portfolio of investments as a whole and as a part of an overall investment strategy having risk and return objectives reasonably suited to the Funds and to The Center.
- Investments will be diversified unless the Finance and Investment Committee prudently determines that, because of special circumstances, the purposes of the Fund are better served without diversification. A decision not to diversify will be reviewed as frequently as circumstances require, but at least annually.
- Within a reasonable time after receiving property, the Finance and Investment Committee will make and carry out decisions concerning the retention or disposition of the property or to rebalance a portfolio, in order to bring The Center’s investment portfolio into compliance with the purposes, terms, and distribution requirements of The Wild Center.
- The Center will only incur costs that are appropriate and reasonable in relation to the Funds’ assets, the purposes of the institution and the skills available to the institution.
- A person having special skills or expertise, or selected in reliance on a representation that he/she has special skills or expertise, has an affirmative duty to use those skills or expertise in managing and investing The Center’s Funds.

V. Delegation of Authority

A. RESPONSIBILITIES OF THE TRUSTEES

The Wild Center Board of Trustees has delegated the responsibility of management and oversight of the Funds to the Finance and Investment Committee in accordance with this Investment Policy. The Committee shall be comprised of certain members of The Wild Center Board of Trustees and, if deemed appropriate from time to time, may also include other individuals, who are not Trustees, who can add investment knowledge and perspective to the Committee. The members of the Finance and

Investment Committee shall discharge their duties solely in the interests of The Wild Center. Consistent with the standards set forth by NYPMIFA, the Finance and Investment Committee will act in good faith, with the care and diligence that an ordinarily prudent person in a like position would exercise under similar circumstances, in:

- Selecting, continuing or terminating an External Agent, including assessing the Agent's independence and the presence of any conflicts of interest the Agent has or may have;
- Establishing the scope and terms of the delegation, including the payment of compensation, consistent with the purposes of The Center and the Funds; and
- Monitoring the agent's performance and compliance with the scope and terms of the delegation.

The specific responsibilities of the Finance and Investment Committee include:

1. Establish reasonable and consistent investment objectives, policies and guidelines that will direct the investment of The Wild Center Funds.
2. Determine the appropriate risk tolerance and investment time horizon for The Wild Center Funds and communicate these decisions to the appropriate parties.
3. Delegate, at the Committee's discretion, certain responsibilities to professional experts in various fields, including an Investment Management Consultant, an Investment Manager, a Custodian, and/or a Co-Trustee, collectively referred to as "External Agents" under NYPMIFA.
4. Evaluate on a regular basis the performance of the Funds, as well as, all individual External Agents acting on behalf of The Center.
5. Develop and enact proper control procedures.
6. Replace the External Agent(s) due to poor performance, a fundamental change in the firm's investment management process, a failure to comply with established guidelines, significant changes in the firm's personnel, or for any reason deemed important by the Committee.

External Agents will be held responsible and accountable to achieve the investment objectives herein stated. While it is not believed that the limitations will hamper Investment Managers, each Manager should request from the Finance and Investment Committee any modifications deemed appropriate.

B. RESPONSIBILITIES OF THE INVESTMENT MANAGEMENT CONSULTANT

If the Finance and Investment Committee shall determine that it is in the best interest of The Wild Center Funds to engage an Investment Management Consultant, the Consultant's role is that of a non-discretionary advisor to the Trustees and the Committee. Investment advice concerning the investment management of the assets will be offered by the Investment Management Consultant, and will be consistent with the investment objectives, policies, guidelines and constraints as established in this statement. Specific responsibilities of the Investment Management Consultant include:

1. Assist in the development and annual review of the investment policy.
2. Conduct investment manager searches when requested by the Finance and Investment Committee.
3. Provide research on the Investment Managers on an ongoing basis.

4. Monitor the performance of the Investment Managers at least quarterly and report to the Finance and Investment Committee on the progress of the Managers relative to the investment objectives.
5. Communicate matters of policy, manager research, relevant organizational changes at the manager, and manager performance to the Finance and Investment Committee.
6. Review The Wild Center's investment history, capital market performance and the contents of this investment policy statement with any newly appointed members of the Finance and Investment Committee.
7. Assist the Finance and Investment Committee in the development and implementation of a strategic asset allocation plan.
8. Assist the Finance and Investment Committee in the negotiation of fees with the Investment Manager(s).
9. Establish customized investment performance benchmarks for the overall Wild Center portfolio and for each component (Investment Manager) and monitor the portfolio on an ongoing basis.
10. Recommend the termination and/or change of any Investment Manager(s).
11. Assist the Finance and Investment Committee with the periodic rebalancing of The Wild Center portfolio.

In addition, the Investment Management Consultant's role will include the following administrative responsibilities:

1. Oversee the day-to-day operational investment activities of The Wild Center, as reasonably required, subject to the policies established by the Finance and Investment Committee.
2. Implement the allocation and reallocation of Wild Center assets among asset classes, investment styles and investment management firms in accordance with the decisions of the Finance and Investment Committee and within the guidelines of allocation targets set forth in this policy statement.
3. Receive, review and distribute reports from the outside professionals regarding the status of The Wild Center portfolios.
4. Interface with Investment Managers, the custodian bank(s) and other outside professionals and communicate with the Finance and Investment Committee.
5. Periodically issue status reports to the Finance and Investment Committee.

C. RESPONSIBILITIES OF THE INVESTMENT MANAGER(S)

Each Investment Manager managing an individually managed account for The Wild Center will have full discretion to make all investment decisions for the assets placed under its jurisdiction, while observing and operating within all policies, guidelines, constraints and philosophies as outlined in this statement. However, any mutual or commingled fund retained by The Wild Center will not be expected to adhere to these responsibilities. The Investment Manager must act with reasonable care, skill and caution. As required by NYPMIFA, any contract will allow termination by The Center, at any time, without penalty, upon not more than 60 days notice. Specific responsibilities of the Investment Manager(s) shall include:

1. Discretionary investment management, including decisions to buy, sell or hold individual securities and to alter asset allocation within the guidelines established in this statement.

2. Reporting quarterly investment performance results on a timely basis.
3. Timely communication of any major changes to economic outlook, investment strategy, or any other factors affecting the implementation of the investment process or the progress toward meeting performance objectives.
4. Informing the Finance and Investment Committee and the Investment Management Consultant of any qualitative changes to the investment management organization. Examples include changes in portfolio management personnel, ownership structure, investment philosophy or investment discipline, any company code of ethics violation by personnel directly involved in managing Wild Center Funds, and material regulatory and/or legal actions filed against the organization.
5. Voting proxies, if requested by the Finance and Investment Committee, on behalf of The Wild Center and communicating such voting records to the Finance and Investment Committee when requested.
6. Timely communication of trading information to the Finance and Investment Committee and the Investment Management Consultant.
7. Quarterly communication confirming the manager is in compliance with The Wild Center Statement of Investment Policy & Objectives for the most recent quarter. If not in compliance, the manager must list each “out of compliance” item and steps that will be taken to bring into compliance.
8. Manager must communicate annually that the fee being charged for the management of The Wild Center portfolio(s) is the lowest fee in place for any account at the Manager of a similar size using a similar investment strategy.

VI. WILD CENTER SPENDING POLICY

The main objective of the spending policy is to maintain or grow the real (inflation-adjusted) value of the Fund assets after accounting for spending. Consistent with NYPMIFA requirements, in making determinations as to whether to appropriate or accumulate Funds, The Center will consider, if relevant, the following factors:

- the duration and preservation of the Fund,
- the purposes of The Center and the Fund,
- general economic conditions,
- the possible effect of inflation or deflation,
- the expected total return from income and the appreciation of investments,
- other resources of The Center,
- where appropriate and if circumstances would otherwise warrant, alternatives to the expenditure of the Funds, giving due consideration to the effect that such alternatives may have on The Center, and
- the investment policy of The Center.

A. SPENDING POLICY—TOTAL FUND VALUE LESS THAN \$5 MILLION

Until the Funds reach a value of \$5 million, the spending policy shall be to distribute only realized income. Realized income is defined as interest, dividends and realized capital gains, net of realized capital losses. A spending level or a loan from the Funds to support Center operations above this amount can only be authorized with the approval of the Board of Trustees.

B. Spending Policy—Total Fund Value Greater Than \$5 Million

Once a Fund value over \$5 million has been achieved, the Funds will be governed by a spending policy that seeks to distribute up to four percent (4%) of the preceding five year average of Fund market value. The average market value will be calculated annually on September 30 utilizing monthly values over the five year period. (If the fund has not been in existence for five years, the average market value will be calculated using monthly values beginning on September 30, 2010.) Earnings and income in excess of the payout rate shall be reinvested.

If circumstances arise that requires a spending level above 4%, this spending level (or a loan from the Funds to support Center operations) can only be authorized with the approval of the Board of Trustees.

VII. INVESTMENT STRATEGY & OBJECTIVES

In order to achieve its spending goals in perpetuity, the investment strategy for The Wild Center Funds will emphasize total return consistent with preservation of capital and prudent levels of risk.

Returns are expected to preserve and/or enhance the real value of The Wild Center after funds are distributed for current use. In order to accomplish its objectives, The Wild Center may invest as outlined in Section VIII and IX. Any investment, however, which is not easily transacted, will require written Trustee approval. Investment risks will be considered within the context of the entire investment portfolio. Understanding that differing economic conditions may produce periods of relative underperformance and outperformance, there will be an attempt to diversify The Wild Center Funds by both asset class and investment style.

A. SPECIFIC INVESTMENT GOAL

It is the goal of the aggregate Wild Center Funds to generate a long-term target total rate of return of at least 4%, plus inflation. The investment goal is the objective of the aggregate Wild Center assets. It is not intended to be imposed on each individual investment account.

B. VOLATILITY OF RETURNS

The Finance and Investment Committee, with the assistance of an Investment Management Consultant, if so desired by the Committee, will structure a diversified portfolio that is designed to consistently achieve the return target over an investment horizon defined as a five year period. The return target and the portfolio structure are based on certain assumptions and expectations deemed reasonable by the Finance and Investment Committee and, if applicable, the Investment Management Consultant. Moreover, the Committee has given consideration to the risk associated with The Wild Center's investments. The Committee understands that in order to achieve its investment objectives over a full market cycle, The Wild Center will experience volatility of returns and fluctuations of market value.

VIII. INVESTMENT GUIDELINES—FUND VALUE OF LESS THAN \$5 MILLION

Until such time as an Investment Manager/Consultant is retained, the Finance and Investment Committee is authorized to invest The Wild Center Funds in the following assets:

1. Cash money market funds,
2. Federally-insured Certificates of Deposit,
3. Equity mutual funds,
4. Bond mutual funds,
5. U.S. treasury securities and securities of federal agencies and instrumentalities, and
6. Other similar investment vehicles, as deemed prudent to meet The Wild Center's investment goals and objectives as set forth herein.

After consideration of The Center's liquidity requirements, the remainder of the assets will be allocated under the following guidelines:

<u>Asset Class</u>	<u>Minimum</u>	<u>Maximum</u>	<u>Target</u>
Equities:	45%	75%	65%
<i>Domestic</i>	<i>30%</i>	<i>65%</i>	<i>45%</i>
<i>International</i>	<i>10%</i>	<i>30%</i>	<i>20%</i>
Fixed Income:	20%	40%	30%
Cash & Equivalents:	0%	15%	5%

IX. INVESTMENT GUIDELINES—FUND VALUE IN EXCESS OF \$5 MILLION

A. ALLOWABLE ASSETS

Cash Equivalents:

Treasury Bills
Money Market Funds
Commercial Paper
Banker's Acceptances
Repurchase Agreements
Certificates of Deposit

Fixed Income Securities:

US Government and Agency Securities
Corporate Notes and Bonds
Mortgage Backed Securities
Preferred Stock
Foreign-Issued Government/Corporate Bonds
Collateralized Mortgage Obligations or equivalents (CDO's; CLO's etc.)
Municipal Securities

Equity Securities:

Common Stocks
Convertible Notes and Bonds
Convertible Preferred Stocks
American Depository Receipts (ADRs) of Non-US Companies
Master Limited Partnerships

Mutual or Commingled Funds:

The Center recognizes that mutual or commingled funds may not adhere exactly to these guidelines. However, when selecting fund products, the Finance and Investment Committee of The Wild Center will refer to these guidelines as a basis to select a new fund.

Alternative Investments:

Subject to review

B. INVESTMENT RESTRICTIONS

1. The Investment Managers of the traditional equity and fixed-income portfolios should receive Investment Committee approval prior to use of specialized investment activities (e.g. short selling, securities lending, financial futures, derivatives) to be utilized in managing the portfolios. If investments in non-marketable securities are to be made, an explanation for using those vehicles should be included in a written document prior to approval.
2. No position of any one issuer shall exceed 5% of the aggregate Wild Center assets based on value, with the exception of securities issued by the U.S. Government. There shall be no purchase, which would cause a position in The Wild Center portfolio to equal or exceed 7% in the issue outstanding. This limitation shall not apply to investments in diversified Indexed Mutual Funds when deemed appropriate by the Finance and Investment Committee, particularly during the early stages of the Fund's existence.
3. The core fixed income portfolio shall have a weighted average credit quality of at least A-or-better as rated by the major rating services. No more than 10% of the market value of the Investment Manager's portfolio should include below investment grade securities.

C. ASSET ALLOCATION GUIDELINES

To ensure returns are sufficient to support the investment objectives of The Wild Center, the aggregate Wild Center assets will be invested with the following long-term allocations and ranges:

<u>Asset Class</u>	<u>Minimum</u>	<u>Maximum</u>	<u>Target</u>
Equities:	45%	75%	60%
<i>Domestic</i>	<i>30%</i>	<i>65%</i>	<i>40%</i>
<i>International</i>	<i>10%</i>	<i>30%</i>	<i>20%</i>
Fixed Income:	20%	40%	30%
Alternative Investments:	0%	20%	5%
Cash & Equivalents:	0%	15%	5%

D. REBALANCING

In the event that the above aggregate asset allocation guidelines are violated, for reasons including but not limited to market price fluctuations, the Finance and Investment Committee shall instruct the Investment Management Consultant to bring the portfolio into compliance with these guidelines as promptly and prudently as possible. Specifically, the asset allocation mix is to be reviewed at least quarterly. If the allocations should fall outside the established limits by +/- 5%, the portfolio will be adjusted to fall within the permissible policy ranges within a reasonable period of time. In the event that any individual Investment Manager's portfolio is in violation with its specific guidelines, for reasons including but not limited to market price fluctuations, the Finance and Investment Committee shall expect that the Investment Manager to bring the portfolio into compliance with these guidelines

as promptly and prudently as possible without instruction from the Finance and Investment Committee.

X. INVESTMENT MANAGER SEARCH & SELECTION

The Finance and Investment Committee will search for investment managers to invest according to the stated policy guidelines and objectives. Managers will be screened considering:

- investment style and philosophy,
- investment decision-making process and discipline,
- personnel qualifications, communication and customer service,
- ethics, institutional financial controls and compliance,
- firm reputation, organizational stability and strength,
- absolute returns (AIMR compliant),
- risk-adjusted performance,
- consistency of returns and performance in both up and down markets, and
- cost.

The search process will ultimately provide a working list of managers from which a final decision will be made.

XI. INVESTMENT MANAGER PERFORMANCE REVIEW & EVALUATION

Performance reports generated by the Investment Management Consultant shall be compiled at least quarterly and communicated to the Finance and Investment Committee for review. The investment performance of the total Wild Center portfolio, as well as individual Investment Managers, will be measured against commonly accepted performance benchmarks. Consideration shall be given to the extent to which the investment results are consistent with the investment objectives set forth in this statement. The Finance and Investment Committee intends to evaluate The Wild Center portfolio over at least a three-year period, but will closely monitor performance on a quarterly basis.

The goal of each investment manager, over the investment horizon, shall be to:

1. Manage assets consistent with the agreed upon investment style and philosophy.
2. Generate positive Alpha over a full market cycle (i.e., should outperform the appropriate benchmark on a risk adjusted basis). A benchmark, or blended market index, will be selected that most closely corresponds to the manager's style and will be agreed upon by the Committee and the Investment Manager.
3. The manager should perform in the top half of an appropriate peer group over the past 3 and 5 year annualized periods.

The Finance and Investment Committee reserves the right to terminate an Investment Manager for any reason including but not limited to the following:

1. Investment performance significantly less than anticipated given the discipline employed and the risk parameters established or unacceptable justification of poor results.
2. Failure to adhere to any aspect of this statement of investment policy, including communication and reporting requirements.

3. Significant qualitative changes to the investment management organization.

Investment Managers shall be reviewed regularly regarding performance, personnel, strategy, research capabilities, organizational and business matters and other qualitative factors that may impact their ability to achieve the desired investment results.

Current as of 12/28/2010