

Southern California I.B.E.W. – N.E.C.A
Defined Contribution Plan
STATEMENT OF INVESTMENT POLICY
ADOPTED as of October 30, 2019

INTRODUCTION

The purpose of this Statement of Investment Policy (the "Policy") document is to set out the long-range goals and short-term needs of the **Southern California I.B.E.W. – N.E.C.A Defined Contribution Plan**, (the "Fund" or "Plan") state the overall asset mix of the Fund, and describe the structure of and guidelines for the investment managers. The Plan is funded through contributions from participating employers on the basis of terms set forth in applicable collective bargaining agreements or participation agreements.

The Trustees of the Fund (the "Trustees") are responsible for creating this Statement of Investment Policy, selecting investment managers, allocating assets among these managers and monitoring the managers' performance. The investment managers are responsible for the management of the assets given to them by the Trustees that include allocations among allowable asset classes, selection and disposal of individual securities, and diversifying portfolio assets under the investment managers' control so as to minimize the risk of large losses, unless under the circumstances, it is clearly prudent not to do so. The investment managers are responsible for notifying the Trustees in writing if in their judgment it is imprudent to manage the assets within any of these guidelines. In order to discharge their fiduciary duties, the Board of Trustees has retained an Investment Consultant who represents and warrants they have expertise in asset allocation and the selection of individual Investment Managers. It is the intent of the Trustees to rely upon the written recommendations of the Investment Consultant as to the selection of asset allocation mix, the retention or discharge of individual Investment Managers and commingled investment vehicles and the provisions of these Investment Guidelines. The Investment Consultant has agreed to provide required timely recommendations to the Board of Trustees.

Commingled investment vehicles, including mutual funds, may be used. To the extent assets are placed in commingled funds, it is understood that the practices of such commingled funds will be in accordance with the funds' prospectus or investment guidelines and not in accord with the restrictions of these Guidelines.

Assets shall be invested in a manner consistent with the fiduciary standards contained in the Employee Retirement Income Security Act of 1974, as amended, and the regulations promulgated thereunder and applicable federal and state laws and regulations. All transactions undertaken on behalf of the Fund must be in the sole interest of the Fund and its participants and beneficiaries.

ASSET MIX

The Trustees recognize that in adopting an asset mix for the Fund they are setting a target for the allocation of assets. They also realize that since the market value of securities fluctuate, it is not possible to meet these specific targets at all times. The Fund Office Administrator and Assistant Administrator (the "Fund Staff") and Segal

Marco Advisors or such other Investment Consultant as may be subsequently designated by the Trustees (the "Investment Consultant") will monitor this allocation on a quarterly basis and report to the Trustees. The Investment Consultant shall provide the Trustees with a written quarterly performance report.

From time to time the Trustees may reallocate assets among Managers or commingled vehicles based upon the written recommendations of the Investment Consultant.

The target asset allocation for the Fund is as follows.

Asset Class/Strategy	Target Allocation	Range
U.S. Large Cap Equities	20%	15% to 25%
U.S. Mid Cap Equities	4%	2% to 6%
U.S. Small Cap Equities	3%	1% to 5%
International Equities	8%	4% to 12%
Total Equities	35%	30% to 40%
Core Fixed Income	18%	10% to 25%
High Yield	4%	0% to 7%
TIPS	5%	0% to 10%
Global Fixed Income	18%	10% to 25%
Total Fixed Income	50%	40% to 60%
Real Estate	15%	10 to 20%
Total Alternatives	15%	10% to 20%
Total Assets	100%	

TOTAL PLAN PERFORMANCE

The Fund shall also seek to achieve a long term rate of return on investments that is equal to or exceeds a custom benchmark return that is consistent with the Fund's current and historical asset allocation structure.

GUIDELINES FOR SEPARATE ACCOUNT ACTIVE MANAGERS

EQUITY MANAGERS

Equity managers serve in a specialist role managing equity securities. Unless otherwise authorized in writing by the Trustees, the following guidelines apply to each equity manager as defined by their role in the Fund.

U.S. Large Cap Equity Managers

U.S. Large Cap Equity Managers may invest in the common stocks and convertible bonds of U.S. companies. With respect to companies organized under the laws of countries other than the U.S. ("foreign companies"), American Depository Receipts (ADRs), U.S. exchange listed foreign company stocks, and exchange traded funds (ETFs) to invest excess cash or to gain exposure to a sector or industry versus an individual security are allowed.

U.S. Mid Cap Equity Managers

U.S. Mid Cap Equity Managers may invest in the common stock and convertible bonds of mid cap U.S. companies. With respect to companies organized under the laws of countries other than the U.S. ("foreign companies"), American Depository Receipts (ADRs), U.S. exchange listed foreign company stocks, and exchange traded funds (ETFs) to invest excess cash or to gain exposure to a sector or industry versus an individual security are allowed.

U.S. Small Cap Equity Managers

U.S. Small Cap Equity Managers may invest in the common stock and convertible bonds of smaller U.S. companies. With respect to companies organized under the laws of countries other than the U.S. ("foreign companies"), American Depository Receipts (ADRs), U.S. exchange listed foreign company stocks, and exchange traded funds (ETFs) to invest excess cash or to gain exposure to a sector or industry versus an individual security are allowed.

General Guidelines for Equity Managers

Equity managers are prohibited from investing in venture capital, private equity, limited partnerships, options, futures, warrants, swaps, and other derivative investments, unless specifically authorized by this Policy or the guidelines or prospectus for commingled funds.

The equity managers are expected to diversify their portfolios to avoid large losses.

Non-US Equities

Non-US equity managers seek to track the investment performance of the MSCI All Country World ex USA Investable Market Index, an index designed to measure equity market performance in developed and emerging markets, excluding the United States.

The investment objectives, policies and restrictions of the manager are set forth in manager's prospectus, declaration of trust, or other governing documents, including the manager's statement of additional information (as amended from time to time).

FIXED INCOME MANAGERS

Fixed income managers serve in a specialist role managing debt securities. Unless otherwise authorized in writing by the Trustees, the following guidelines apply to each fixed income manager.

Core Fixed Income Managers

Domestic Core Fixed Income Managers' investments may include (i) U.S. dollar denominated obligations of the United States Government and its Agencies and instrumentalities, and U.S. corporations (intended to also include Real Estate Investment Trust (REIT) debt securities, and railroad equipment trust certificates), (ii) mortgage-backed securities including Collateralized Mortgage Obligations ("CMOs") and commercial mortgage backed securities (CMBS), (iii) Asset Backed Securities ("ABS"), (iv) *SEC Rule 144A* securities with registration rights, (v) municipal bonds, (vi) short term securities as detailed below in the Short-Term Investments section of the Policy, (vii) securities of foreign companies or foreign countries (sovereigns or supnationals) denominated in U.S. dollars, trading in the U.S. markets and capable of settlement in U.S. markets (Yankee bonds), and (viii) dollar denominated obligations of U.S. companies trading outside the U.S. ("Eurobonds").

Fixed income securities must be rated at least investment grade or higher by one or more nationally recognized statistical rating organizations (NRSRO), such as Fitch, Moody's or Standard & Poor's, respectively at the time of purchase. If a security's rating falls below investment grade (BBB-/Baa3/BBB-), the fixed income manager will promptly (within 3 business days) notify the Trustees in writing of the event and describe its plan for dealing with the security. Should the manager decide to continue to hold the downgraded issue, the manager will report to the Trustees quarterly in writing as to the status of the security. Where ratings differ among rating agencies, the fixed income manager shall use the middle of the Moody's, Standard & Poor's and Fitch ratings to determine compliance with quality guidelines, so long as all three ratings exist. If two ratings are provided, the lower (more conservative) rating shall be used. If only one rating is provided, that rating shall be used.

The average option adjusted (effective) duration of the Core Fixed Income Managers' portfolios may not exceed 125% of the Barclays Capital Aggregate Index.

U.S. Treasury Inflation Protected Securities

This Vanguard fund is designed to protect investors from the eroding effect of inflation by investing in securities that seek to provide a real return. The fund invests in bonds that are backed by the full faith and credit of the federal government and whose principal is adjusted quarterly based on inflation.

The investment objectives, policies and restrictions of the manager are set forth in manager's prospectus, declaration of trust, or other governing documents, including the manager's statement of additional information (as amended from time to time).

High Yield

The fund is designed to provide fixed income diversification via high yield fixed income which is a bond rated below investment grade at the time of purchase.

The investment objectives, policies and restrictions of the manager are set forth in manager's prospectus, declaration of trust, or other governing documents, including the manager's statement of additional information (as amended from time to time).

Non-U.S. Fixed Income Managers

Global-Plus Fixed Income is an actively managed global bond strategy with a research-driven investment approach. This service invests in the sovereign debt of developed countries, investment-grade credits, agencies, mortgages, commercial mortgage-backed securities and asset-backed securities, and takes opportunistic positions in high-yield and emerging-market debt, where permitted by client guidelines.

The investment objectives, policies and restrictions of the manager are set forth in manager's prospectus, declaration of trust, or other governing documents, including the manager's statement of additional information (as amended from time to time).

General Guidelines for Fixed Income Managers

Fixed income managers are prohibited from investing in venture capital, private equity, options, futures, warrants, swaps, and other derivative investments (except CMOs and CMBS consistent with this Policy) , unless specifically authorized by this Policy or the guidelines or prospectus for commingled funds. CMO and CMBS investments shall be limited to the more stable classes (e.g., Planned Amortization Classes (PACs), Targeted Amortization Classes (TACs), Sequentials, Very Accurately Defined Mortgages (VADMs), Accrual bonds, Accretion-Directed classes (ADs). Specifically prohibited are companion or support tranches, floaters, inverse floaters, income only, and principal only CMOs and structured notes unless specifically allowed in writing. At no time may derivatives be utilized to leverage the Fund or for speculation.

An investment manager investing in CMOs and CMBS shall comply at all times with the Department of Labor's Statement on Derivatives issued March 21, 1996.

The investment manager will monitor and control the risk of all positions by accounting for the impact on portfolio duration of each position. This impact will be used to calculate overall portfolio duration.

PORTFOLIO CONSTRAINTS

For separate account managers:

Equity Securities

1. Should be sufficiently diversified with no single equity issue exceeding 5% of the cost value of the total equity portfolio.
2. Individual domestic securities will include those traded on the New York, American and NASDAQ Exchanges. No restricted stock or private placements are permitted.
3. There will be no short selling, options trading, commodity trading or investments in derivative or other highly speculative securities

Fixed Income Securities

1. Diversification: Credit exposure to any individual issuer, other than the U.S. Government and its Agencies and instrumentalities, shall not exceed 5% of total fixed income portfolio assets.
2. Quality: Only "investment grade" securities at time of purchase will be held in the portfolio. Overall quality will average AA- or better. If subsequently

downgraded after purchase, no more than a maximum of 10% of total fixed income portfolio assets shall be below investment grade.

3. Maturity: The average maturity of the portfolio's fixed income component will not exceed 10 years. Portfolio duration will typically be equal to or less than the duration of the Barclays Capital Government/Credit Bond Index, and the Barclays Government/Credit Intermediate Bond Index.
4. Sector Restrictions: Holdings may be in U.S. Government and Agency issues, mortgage-backed securities, asset-backed securities, corporate bonds, money market instruments. There will be no investments in foreign currency denominated bonds.

Time Horizon

1. This portfolio has a long term investment time horizon allowing investment in long term assets.
2. All investments will be in highly liquid, marketable securities so that distribution requests can be processed promptly and benefits paid when due.

ALTERNATIVE MANAGERS

Real Estate Investment Guidelines

Real Estate Equity Managers serve in a specialized role managing real estate equity. For real estate commingled trusts and mutual funds, the trust guidelines or other guidelines outlined in the prospectus will apply. Selection, evaluation and asset management of properties shall be assumed by each real estate equity Manager utilizing prudent underwriting criteria including, but not limited to property type, geographic location, market analysis, physical condition and tenancy.

The investment objectives, policies and restrictions of the manager are set forth in manager's prospectus, declaration of trust, or other governing documents, including the manager's statement of additional information (as amended from time to time).

LIQUIDITY AND REBALANCING

The Fund's liquidity needs shall be reviewed by the Trustees based upon the current benefit levels, anticipated cash flow, projected contributions and other factors relative to the economic status of the Fund. At times contributions may not cover the benefits and expenses of the Fund. Consequently it may be necessary from time to time to withdraw cash from the Fund's manager accounts to cover these liabilities.

Periodically, the Fund's staff will estimate the amount of cash needed to meet the Fund's expenditures and transfer assets from the manager accounts to the Fund administrative account. Payments will be made from that account.

The Fund's staff in consultation with the Investment Consultant will make withdrawals from or contributions to each of the Fund's managers in a manner to improve compliance with the Fund's target asset allocation described above.

In addition, on a quarterly basis, the Fund's asset allocation will be reviewed and if the market value of any of the publicly traded assets classes (Equity and Fixed Income) are beyond the ranges stated above, the Investment Consultant shall be responsible for providing rebalancing instructions to the Trustees and Fund Staff to transfer assets

among the manager accounts to bring the Fund's asset allocation into compliance with the Fund's allocation targets.

PROXY VOTING

Segal Marco Advisors shall be responsible for voting the proxies of all securities held by the Fund and for providing the Board of Trustees with an annual report of all such proxy votes cast on behalf of the Fund.

COMMUNICATIONS

The managers will periodically issue a report reviewing their investment strategy and performance. The report should show any management fees paid to the manager and commissions paid by the manager during the quarter. Further, in recognition of the fact that the Investment Consultant cannot completely monitor all aspects of the guidelines given the available data and actions under exclusive control of the manager, the managers are required to report certain information.

The managers shall provide to the Fund and the Fund's Investment Consultant notice of the following: including, but not limited to, violation(s) of this Policy as well as any internal manager guidelines, material changes in organizational structure, ownership, financial condition, portfolio manager structure and key personnel of the firm. In addition, the investment managers shall provide notice of any litigation, investigations or disciplinary action by any regulatory or governmental body, including notice of any proposed action, and any other pertinent information that might be material to the Fund. The investment managers shall provide such notices as soon as possible, but in no event later than 14 days following such change(s) or action(s).

The managers will meet with the Trustees periodically to discuss their investment results as well as the objectives and policies that influence the results achieved in the account that they manage on behalf of the Fund.

By acceptance of this Policy, each separate account active Manager reaffirms that it is a fiduciary to the Fund and is responsible for notifying the Trustees in writing if in its judgment it is imprudent to manage the assets within any of these guidelines and when it would be prudent to amend any of these guidelines. The Trustees may amend this policy statement from time to time as is deemed necessary.

ADDENDUM

The attached addendum, which is incorporated herein, contains the list of managers for the Fund, the managers' respective mandates, benchmarks and performance expectations. The addendum may be updated from time to time through the addition or replacement of managers. Such revised addendum (a) shall be incorporated by reference as the addendum to this Policy.

This Statement of Investment Policy is adopted October 30, 2019 as reflected in the meeting minutes of the Board of Trustees.

By: _____

Title: Jim Willson, Chairman

Date: _____


10/30/19

By: Joel Barton
Title: Joel Barton, Secretary

Date: 10-30-19

The above Statement of Investment Policy for the **Southern California I.B.E.W. – N.E.C.A Defined Contribution** Fund is hereby acknowledged by the undersigned Investment Manager that agrees to the duties and obligations set forth in this Statement of Investment Policy.

Name of Manager:: _____

By:  _____

Date: _____

Title: _____

The above Statement of Investment Policy for the **Southern California I.B.E.W. – N.E.C.A Defined Contribution** Fund is hereby acknowledged by the undersigned Investment Consultant that agrees to the duties and obligations set forth in this Statement of Investment Policy.

Segal Marco Advisors

By: Michael Lyons

Date: 10/30/19

Title: Vice President

ADDENDUM TO THE FUND STATEMENT OF INVESTMENT POLICY

Asset Class/Strategy	Manager Name	Style (Construction) Benchmark	Long-Term Benchmark
-----------------------------	---------------------	---------------------------------------	----------------------------

EQUITY MANAGERS			
Large Cap Core	ASB Capital	S&P 500	S&P 500
Large Cap Growth	INTECH	S&P 500 / Citigroup Growth	S&P 500
Large Cap Value	Robeco	Russell 1000 Value	Russell 1000
Mid Cap Core	Amalgamated Bank	S&P 400	S&P 400
Small Cap Value	EARNEST Partners	Russell 2000 Value	Russell 2000
International	Ullico	MSCI EAFE	MSCI ACWI ex USA IMI Index Net

It is expected that the Equity Manager's net-of-fee return will exceed the Long-Term Benchmark over a market cycle or three years, which ever is less.

FIXED INCOME MANAGERS			
Core Fixed Income	Dodge & Cox	Barclays Capital Aggregate	Barclays Capital Aggregate
TIPS	Vanguard	Barclays US Treasury Inflation Protected Index	Barclays US Treasury Inflation Protected Index
High Yield	Mackay Shields	Bank of America Merrill Lynch U.S. High Yield Master II Constrained Index	Bank of America Merrill Lynch U.S. High Yield Master II Constrained Index
Global Fixed Income	Alliance Bernstein	Barclays Capital Global Aggregate Bond Index	Barclays Capital Global Aggregate Bond Index
Core Fixed	AFL-CIO Housing	Barclays Capital Mortgage	Barclays Capital

Income	Investment Trust	Index	Aggregate
It is expected that the Fixed Income Manager's net-of-fee return will exceed the Long-Term Benchmark over a market cycle or three years, which ever is less.			

ALTERNATIVE MANAGERS			
Real Estate	Bentall GreenOak		NCREIF ODCE
Real Estate	Intercontinental		NCREIF ODCE
It is expected that the Alternative Manager's net-of-fee return will exceed the Long-Term Benchmark over a market cycle or three years, which ever is less.			

Appendix

Fund Summaries for:

Vanguard TIPS

Mackay Shields High Yield

AllianceBernstein Global Fixed Income

