

Investment Policy Statement

Prepared on: May 23, 2011

Prepared for:

Sample DB Client - MR
154 Victory Ln.
Pittsburgh PA 15222

Executive Summary

Client Name: Sample DB Client - MR
Client Type: Retirement Plans - Committee Directed
Client Subtype: Corporate Defined Benefit
Fiduciary Standard of Care: ERISA
Tax Id: 00-0000000
Current Assets: \$7,320,000
Modeled Return: 4.7%
1-Yr Loss Limit (Worst case scenario): 1.2%
"Safe Harbor" Compliance Options: Selected

This Investment Policy Statement should be reviewed by an attorney knowledgeable in this specific area of the law. Any change to this policy should be communicated in writing and on a timely basis to all interested parties. If any term or condition of this Investment Policy Statement conflicts with any trust and/or plan document, the document shall control, as long as such term or condition is consistent with the law.

Purpose

The purpose of this Investment Policy Statement (IPS) is to assist the Investment Committee (Committee) in effectively supervising, monitoring and evaluating the investment of the Company's Retirement Plan (Plan) assets. The plan's investment program is defined in the various sections of this IPS by:

1. Stating in a written document the committee's attitudes, expectations, objectives and guidelines for the investment of all of the plan's assets.
2. Encouraging effective communications between the committee and all parties involved with the investment management decisions.
3. Establishing formal criteria to select, monitor, evaluate and compare the performance results achieved by each investment option on a regular basis.
4. Setting forth an investment structure for managing the plan's assets. This structure includes various asset classes, investment management styles, asset allocation and acceptable ranges that, in total, are expected to produce an appropriate level of overall diversification and total investment return over the investment time horizon.
5. Providing guidelines for each investment portfolio that control the level of overall risk and liquidity assumed in that portfolio, so all Plan assets are managed in accordance with stated objectives.
6. Providing rate-of-return and risk characteristics for each asset class represented by various investment options.
7. Complying with all ERISA, fiduciary, prudence and due diligence requirements experienced investment professionals would utilize, and with all applicable laws, rules and regulations from various local, state, federal and international political entities that may impact the Plan assets.

Statement of Objectives

The Plan is a defined benefit plan established in 1/10/2009. The Plan currently has \$7,320,000 in assets and is Over-funded.

This IPS has been arrived at upon consideration by the Committee by a wide range of policies, and describes the prudent investment process the Committee deems appropriate. This process includes offering various asset classes and investment management styles that, in total, are expected to offer the opportunity to diversify the portfolio in a manner consistent with the specified risk and return requirements of the portfolio.

The objectives of the Plan are:

- Have the ability to pay all benefit and expense obligations when due.
- Control costs of administering the plan and managing the investments.
- Maximize return within reasonable and prudent levels of risk in order to minimize contributions.
- Follow general "safe harbor" rules:

- i. Use prudent experts (registered investment adviser (including mutual funds), bank, or insurance company) to make the investment decisions
- ii. Demonstrate that the prudent expert was selected by following a due diligence process
- iii. Give the prudent expert discretion over the assets
- iv. Have the prudent expert acknowledge their co-fiduciary status (mutual funds are exempt from this requirement - the prospectus is deemed to serve as the fund's fiduciary acknowledgement).
- v. Monitor the activities of the prudent expert to ensure that the expert is performing the agreed upon tasks.
 - Maintain a "funding cushion" for unexpected developments and for possible future increases in benefit structure and expense levels.
 - Maintain flexibility in determining the future level of contributions. Investment results are the critical element in achieving the investment objectives, while reliance on contributions is a secondary element.
 - Maintain a fully funded status with regard to current pension liabilities.

Time Horizon

The investment guidelines are based upon an investment horizon of greater than five years. The Plan's strategic asset allocation is also based on this long-term perspective. Short-term liquidity requirements are anticipated to be non-existent, or at least should be covered by the annual contribution.

Risk Tolerances

The Committee recognizes that some risk must be assumed in order to achieve the investment objectives of the plan. In establishing the risk tolerances of the IPS, the ability to withstand short and intermediate term variability were considered. A 1-yr loss limit of 1.2% has been calculated for the portfolio. Statistically speaking, there is a 2.5% chance that the 1-year return will actually be lower than 1.2%.

The plan's long time horizon, current financial condition and several other factors suggest collectively some interim fluctuations in market value and rates of return may be tolerated in order to achieve the longer-term objectives.

Performance Expectations

The desired investment objective is a long-term rate of return on assets that is at least 4.7%. The target rate of return for the Plan has been based upon the assumption that future real returns will approximate the long-term rates of return experienced for each asset class in the IPS. The Committee realizes market performance varies and a 4.7% rate of return may not be meaningful during some periods. Accordingly, relative performance benchmarks for the investment options are set forth in the "Monitoring" section.

Duties and Responsibilities

Investment Committee

As fiduciaries under the plan, the primary responsibilities of the Committee are:

1. Prepare and maintain this investment policy statement.
2. Prudently diversify the plan's assets to meet an agreed upon risk/return profile.
3. Prudently select investment options.
4. Control and account for all investment, record keeping and administrative expenses associated with the plan.
5. Monitor and supervise all service vendors and investment options.
6. Avoid prohibited transactions and conflicts of interest.

Custodian

Custodians are responsible for the safekeeping of the plan's assets. The specific duties and responsibilities of the custodian are:

1. Value the holdings.
2. Collect all income and dividends owed to the plan.
3. Settle all transactions (buy-sell orders).
4. Provide monthly reports that detail transactions, cash flows, securities held and their current value, and change in value of each security and the overall plan since the previous report.
5. Maintain separate accounts by legal registration.

Investment Advisor

The Investment Advisor serves as an objective, third-party professional retained to assist the committee in managing the overall investment process. The Advisor is responsible for guiding the committee through a disciplined and rigorous investment process to enable the committee to meet the fiduciary responsibilities outlined above.

Asset Class Guidelines

The committee believes long-term investment performance, in large part, is primarily a function of asset class mix. Historically while interest-generating investments, such as bonds, have the advantage of relative stability of principal value, they provide little opportunity for real long-term capital growth due to their susceptibility to inflation.

On the other hand, equity investments, such as common stocks, clearly have a significantly higher expected return but have the disadvantage of much greater year-by-year variability of return. From an investment decision-making point of view, this year-by-year variability may be worth accepting given the plan's long time horizon.

Focusing on balancing the risks and rewards of each broad asset class, the following implementation peer groups were selected and ranked in ascending order of "risk" (least to most) according to the most recent quarter's median 3-year Standard Deviation values. The performance expectations (both risk and return) of each broad asset class are contained in Appendix A.

Money Market Taxable
Intermediate-Term Bond
Long-Term Bond
Moderate Allocation
Large Blend
Large Growth
Large Value
Mid-Cap Blend
Foreign Large Blend
Small Blend
Diversified Emerging Mkts

Rebalancing of Strategic Allocation

The percentage allocation to each peer group may vary depending upon market conditions. Please reference the allocation table below for the lower and upper limits for each peer group. When necessary and/or available, cash inflows/outflows will be deployed in a manner consistent with the strategic asset allocation and allocation ranges of the plan. If there are no cash flows, the allocation of the plan will be reviewed quarterly. If the committee judges cash flows to be insufficient to bring the plan within the target allocation ranges, the committee shall decide whether to effect transactions to bring the allocation of plan assets within the threshold ranges.

Peer Group	Strategic Allocation	Lower Limit	Upper Limit
Diversified Emerging Mkts	4%	1%	7%
Foreign Large Blend	15%	12%	18%
Intermediate-Term Bond	9%	6%	12%
Large Blend	16%	13%	19%
Large Growth	18%	15%	21%
Large Value	10%	7%	13%
Long-Term Bond	5%	2%	8%
Mid-Cap Blend	3%	1%	7%
Moderate Allocation	14%	11%	17%
Money Market Taxable	1%	0%	100%
Small Blend	5%	2%	8%

Implementation

Each investment option should be managed by: (i) a bank; (ii) an insurance company; (iii) a registered

investment company (mutual fund); or, (iiii) a registered investment adviser. The committee will apply the following due diligence criteria in selecting each money manager or mutual fund.

fi360

fi360 Fiduciary Score Avg (3yr)

Threshold: ≤ 25 | Pass 3 of the last 4 quarters | Treat missing data values as a failure

*Please reference the fi360 Fiduciary Score Methodology document in Appendix C for additional details.

Expenses

Prospectus Net Exp Ratio (Optional)

Threshold: Top 50% of peer | Pass 3 of the last 4 quarters | Treat missing data values as a failure

Performance

10 Year Return (Optional)

Threshold: Top 50% of peer | Pass 7 of the last 8 quarters | Treat missing data values as a pass

3 Year Return (Optional)

Threshold: Top 50% of peer | Pass 3 of the last 4 quarters | Treat missing data values as a failure

5 Year Return (Optional)

Threshold: Top 50% of peer | Pass 3 of the last 4 quarters | Treat missing data values as a failure

Risk

Standard Deviation (Optional)

Threshold: Top 50% of peer | Pass 3 of the last 4 quarters | Treat missing data values as a failure

Operations

Inception Date (Optional)

Threshold: ≥ 5 Years | Pass 3 of the last 4 quarters | Treat missing data values as a failure

Manager Tenure (Optional)

Threshold: > 5 Years | Pass 3 of the last 4 quarters | Treat missing data values as a failure

In addition to meeting any required criterion, 5 of the 7 optional criterion must be satisfied to meet the overall Due Diligence Criteria.

Monitoring - Performance Objectives

The committee acknowledges fluctuating rates of return characterize the securities markets, particularly during short-term time periods. Recognizing that short-term fluctuations may cause variations in performance, the committee intends to evaluate investment performance from a long-term perspective.

The committee is aware the ongoing review and analysis of the investment options is just as important as the due diligence process. The performance of the investment options will be monitored on an ongoing basis and it is at the committee's discretion to take corrective action by replacing a manager if they deem it appropriate at any time.

On a timely basis, but not less than quarterly, the committee will meet to review whether each investment; specifically:

1. The investment option's adherence to the Watch List Criteria identified below;
2. Material changes in the investment option's organization, investment philosophy and/or personnel; and,
3. Any legal, SEC and/or other regulatory agency proceedings affecting the investment option's organization.

Monitoring - Benchmarks

The Committee has determined it is in the best interest of the Plan's participants that performance benchmarks be established for each investment option. Manager performance will be evaluated in terms of an appropriate market index (e.g. the S&P 500 stock index for large-cap domestic equity manager) and

the relevant peer group (e.g. the large-cap growth mutual fund universe for a large-cap growth mutual fund).

Peer Group

Diversified Emerging Mkts
Foreign Large Blend
Intermediate-Term Bond
Large Blend
Large Growth
Large Value
Long-Term Bond
Mid-Cap Blend
Moderate Allocation
Money Market Taxable
Small Blend

Benchmark Index

MSCI EM NR USD
MSCI AC World Ex USA NR USD
BarCap US Govt/Credit 5-10 Yr TR USD
Russell 1000 TR USD
Russell 1000 Growth TR USD
Russell 1000 Value TR USD
BarCap US Govt/Credit Long TR USD
S&P MidCap 400 TR
Morningstar Moderately Aggr Target Risk
USTREAS T-Bill Auction Ave 3 Mon
Russell 2000 TR USD

Monitoring - Watch List Criteria

The decision to retain or terminate an investment option cannot be made by a formula. Also, extraordinary events do occur that may interfere with the investment option's ability to prudently manage investment assets. It is the committee's confidence in the investment option's ability to perform in the future that ultimately determines the retention of an investment option.

An investment option may be placed on a Watch List and a thorough review and analysis of the investment option may be conducted, when:

fi360

fi360 Fiduciary Score Avg (3yr)

Threshold: ≤ 25 | Pass 3 of the last 4 quarters | Treat missing data values as a failure

*Please reference the fi360 Fiduciary Score Methodology document in Appendix C for additional details.

Expenses

Prospectus Net Exp Ratio (Optional)

Threshold: Top 50% of peer | Pass 3 of the last 4 quarters | Treat missing data values as a failure

Performance

10 Year Return (Optional)

Threshold: Top 50% of peer | Pass 7 of the last 8 quarters | Treat missing data values as a pass

3 Year Return (Optional)

Threshold: Top 50% of peer | Pass 3 of the last 4 quarters | Treat missing data values as a failure

5 Year Return (Optional)

Threshold: Top 50% of peer | Pass 3 of the last 4 quarters | Treat missing data values as a failure

Risk

Standard Deviation (Optional)

Threshold: Top 50% of peer | Pass 3 of the last 4 quarters | Treat missing data values as a failure

Operations

Inception Date (Optional)

Threshold: ≥ 5 Years | Pass 3 of the last 4 quarters | Treat missing data values as a failure

Manager Tenure (Optional)

Threshold: > 5 Years | Pass 3 of the last 4 quarters | Treat missing data values as a failure

In addition to meeting any required criterion, 5 of the 7 optional criterion must be satisfied to meet the overall Due Diligence Criteria.

Monitoring - Expenses

The committee will review at least annually all costs associated with the management of the plan, including:

1. Expense ratios of each mutual fund against the appropriate peer group.
2. Administrative Fees; costs to administer the plan, including record keeping, custody and trust services.
3. The proper identification and accounting of all parties receiving soft dollars and/or 12b-1 fees generated by the plan.

Investment Policy Review

The committee will review this IPS at least annually to determine whether stated investment objectives are still relevant and the continued feasibility of achieving the same. It is not expected that the IPS will change frequently. In particular, short-term changes in the financial markets should not require adjustments to the IPS.

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Signature

Name

Position

Signature

Appendix A: Capital Market Inputs

Capital Market Data last updated April 2011. Copyright (c) 2011 New Frontier Advisors, LLC

	Return (%)	Risk (%)	Underlying Index	Peer Group
Large Cap Equity	8.1	16.0	SBBI Large Company Stocks	Large Blend
Mid Cap Equity	8.4	18.0	Russell Mid Cap	Mid-cap Blend
Small Cap Equity	8.7	21.9	SBBI Small Company Stocks	Small Blend
International Equity	8.4	17.7	MSCI EAFE	Foreign Large Blend
Emerging Market Equity	9.2	24.6	MSCI Emerging Markets	Diversified Emerging Markets
REITs	7.0	19.3	DJ US Select REIT	Real Estate
High Yield Bond	4.8	8.6	Credit Suisse High Yield Bond Index	High Yield Bond
Long-term Bond	4.1	10.1	Barcap U.S. Long Gov/Credit Bond	Long Term Bond
Intermediate-term Bond	3.5	4.7	Barcap U.S. Inter. Gov/Credit Bond	Intermediate Term Bond
International Bond	3.9	10.8	Citigroup World Gov Bond ex US	World Bond
Commodities	2.0	19.7	Gold, London PM Fix	Equity Precious Metals
Money Market	3.1	1.2	SBBI 30 day US Treasury Bill	Money Market Taxable

Correlation Matrix

	LCE	MCE	SCE	IE	EM	REIT	HY	LTB	ITB	IB	MO	CO
Large Cap Equity (LCE)	1.00	0.93	0.76	0.63	0.66	0.59	0.60	0.30	0.24	0.07	0.16	0.01
Mid Cap Equity (MCE)	0.93	1.00	0.88	0.61	0.70	0.68	0.67	0.29	0.23	0.06	0.12	0.04
Small Cap Equity (SCE)	0.76	0.88	1.00	0.52	0.65	0.66	0.65	0.18	0.12	-0.02	0.08	0.02
International Equity (IE)	0.63	0.61	0.52	1.00	0.65	0.45	0.49	0.22	0.19	0.46	0.13	0.18
Emerging Market Equity (EM)	0.66	0.70	0.65	0.65	1.00	0.48	0.54	0.12	0.08	0.12	0.03	0.23
REITs (REIT)	0.59	0.68	0.66	0.45	0.48	1.00	0.60	0.24	0.19	0.10	0.06	0.05
High Yield Bond (HY)	0.60	0.67	0.65	0.49	0.54	0.60	1.00	0.37	0.32	0.14	0.09	0.07
Long-term Bond (LTB)	0.30	0.29	0.18	0.22	0.12	0.24	0.37	1.00	0.88	0.44	0.32	0.04
Intermediate-term Bond (ITB)	0.24	0.23	0.12	0.19	0.08	0.19	0.32	0.88	1.00	0.50	0.42	0.06
International Bond (IB)	0.07	0.06	-0.02	0.46	0.12	0.10	0.14	0.44	0.50	1.00	0.18	0.29
Money Market (MM)	0.16	0.12	0.08	0.13	0.03	0.06	0.09	0.32	0.42	0.18	1.00	-0.13
Commodities (CO)	0.01	0.04	0.02	0.18	0.23	0.05	0.07	0.04	0.06	0.29	-0.13	1.00

Appendix C: Fi360 Fiduciary Score® Methodology

The fi360 Fiduciary Score is a peer percentile ranking of an investment against a set of quantitative due diligence criteria selected to reflect prudent fiduciary management. For each investment with at least a three-year history, fi360 calculates the fi360 Fiduciary Score based on the following due diligence criteria: regulatory oversight, minimum track record, stability of the organization, assets in the investment, composition consistency with asset class, style consistency, expense ratio/fees relative to peers, risk-adjusted performance relative to peers, and performance relative to peers. Investments are evaluated at the conclusion of each calendar quarter. If an investment does not meet an individual due diligence criterion, points are awarded. Investments that satisfy all of the due diligence criteria receive a fi360 Fiduciary Score Quarter of 0. Every other investment is given a Score of 1-100 based on their point total, and representing their percentile ranking within their peer group. The fi360 Fiduciary Score Average is a one-, three-, five- or ten-year rolling average of an investment's Quarter Score. The Average Score is also calculated on a quarterly basis. The fi360 Fiduciary Score represents a suggested course of action and is not intended, nor should it be used, as the sole source of information for reaching an investment decision. Visit fi360.com/fi360-Fiduciary-Score for the complete methodology document.