

TOWN of RIDGEFIELD
INVESTMENT POLICY
Amended December 10, 2025

The Town of Ridgefield Investment Policy (TOR IP) governs the management and investment of the financial assets of the Town of Ridgefield (Town) by the Town Treasurer (Treasurer). The TOR IP may be amended in writing from time to time.

1. SCOPE

The TOR IP applies to the financial assets or funds currently held by the Town, including the proceeds of general obligation bonds and notes issued by the Town. All other funds held in trust by the Town shall also be administered in accordance with the provisions of this TOR IP. The Town's Pension Trust Fund, the Town's OPEB (other postemployment benefits) Trust Fund, and defined contribution plan are exceptions which have their own respective governing policies and are not subject to the TOR IP.

2. AUTHORITY

Pursuant to the Ridgefield Town Charter, Section 9-4, Town Treasurer," the responsibility and authority for investment transactions reside with the Treasurer and the Deputy Town Treasurer (Investment Officers). The Investment Officers shall exercise direct supervision and control over all funds and securities utilizing sound fiscal controls and prudent fiduciary practices. The Investment Officers are fully authorized to buy, sell, and trade investments in accordance with the goals and objectives of the TOR IP, provided, however, that the Deputy Town Treasurer shall have no authority under the TOR IP except in the absence or incapacity of the Treasurer. No person may engage in an investment transaction except as authorized under the terms of the TOR IP.

3. OVERALL INVESTMENT OBJECTIVES

Town funds shall be managed in full compliance with the General Statutes of Connecticut, Chapter 112 "Municipal Finance."

Town funds shall be invested in a prudent manner that seeks to ensure preservation of capital by reasonably mitigating credit, default, and interest rate risk through the prudent selection of securities and depositories and through the reasonable diversification of investments across securities and depositories.

The term structure of investments shall be planned so as to meet expected cash outlays and to mitigate the risk of loss of principal and accrued earnings due to early liquidation of securities or deposits before their scheduled maturities.

The investment program shall seek to earn the highest returns available subject to the above-stated objectives.

4. ELIGIBLE INVESTMENTS

Town funds shall be invested in full compliance with the General Statutes of Connecticut, Chapter 112, "Municipal Finance," Section 7-400 "Investment of Funds." Deposits in the Short-Term Investment Fund (STIF) managed by the Connecticut State Treasurer shall also be permissible investments pursuant to the General Statutes of Connecticut, Chapter 32, "Treasurer", Section 3-27b "Sale of

certificates to state agencies” and Section 3-27f “Investment by Treasurer in participation certificates.”

The Town, as an issuer of tax-exempt obligations, must not engage in any arbitrage practice prohibited by the Treasury Regulations promulgated under Section 148 of the Internal Revenue Code (Code). In no event shall proceeds of tax-exempt bonds or notes issued by the Town be invested in a manner that will violate the provisions of such Section 148 of the Code or any related Treasury Regulations.

5. SELECTION OF FINANCIAL INSTITUTIONS

Town funds may be deposited with any qualified public depository permitted by the General Statutes of Connecticut, Chapter 112, “Municipal Finance”, Section 7-402 “Deposit of Public Money and Trust Funds” and which qualify under such additional credit worthiness guidelines as may be established by the Treasurer.

To guard against defaults, no more than 25% of total funds on deposit in financial institutions may be deposited at any one qualified public depository, excluding deposited funds that are fully insured by the Federal Deposit Insurance Corporation (FDIC) and funds, such as those covered by repurchase agreements, that are fully collateralized by the US Treasury obligations or US government agency obligations.

6. REPORTING REQUIREMENTS

The Treasurer shall prepare a monthly investment report for review by the Board of Finance. This report shall summarize the investment portfolio in terms of investment securities owned, funds on deposit, maturities, earnings rates or yields, and other relevant information.

7. INTERNAL CONTROLS

The Treasurer shall establish a system of internal controls to ensure the integrity of the investment process and prevent loss of funds due to fraud, error, or misrepresentation by another party. The controls will be reviewed by the Town’s independent auditors, as appropriate.

8. MISCELLANEOUS

The TOR IP is intended for guidance of the Town’s Investment Officers only and is not intended or shall not be construed to confer upon any person, firm, or corporation any right, remedy, claim, or benefit under, or by reason of any requirement or provision thereof.

The Investment Officers shall refrain from personal activity that could conflict with the proper and prudent execution of the TOR IP or that could impair their ability to make impartial and objective investment decisions. All investment related activities shall be conducted in a manner that fully complies with the Town Charter, Article XI, Standards of Conduct.”

No provision in the TOR IP shall be the basis of any claim against any trustee, officer, or employee of the Town in an individual or official capacity or against the Town itself.

Amended this 10th day of December, 2025.

Molly McGeehin, Town Treasurer