Archway Investment Fixed Income Fund Investment Policy Statement Updated as of January 2025

GENERAL OBJECTIVES

The primary objective of the Archway Investment Fixed Income Fund (the Fund) is to provide students in Bryant University's Fixed Income Portfolio Management course with a hands-on learning experience. At the same time, the Fund seeks to achieve risk-adjusted returns that equal or exceed the returns on its benchmark index. The students involved in the program will work in conjunction with the faculty member responsible for Fund oversight, currently Professor Kevin Maloney, to maintain a well-diversified portfolio consisting primarily of investment grade fixed income investments, which meets the objectives and guidelines listed below.

INVESTMENT OBJECTIVES

Long-Term Objective and Benchmark

The Fund seeks returns, considering both income and price appreciation, in excess of its Benchmark, the ETF with the ticker symbol AGG, while maintaining a volatility less than 120% of that of its Benchmark. This ETF broadly tracks the Bloomberg Barclays Aggregate Index. That index consists primarily of U.S. Government Treasury and Agency notes and bonds, investment grade corporate bonds issued by U.S. corporations, and Agency Mortgage-Backed Securities. Those three sectors account for approximately 94% of the asset value in the index. Commercial Mortgage-Backed Securities, Asset Backed Securities, taxable municipal securities, and US dollar denominated issues of other sovereign and supranational issuers account for the remainder of the assets in that index. The precise characteristics and composition of this index varies through time.

Its characteristics and risks can and will be monitored through the Bloomberg terminals available for use by the students in the program. The Benchmark was chosen due to its wide diversification, and its common usage as a benchmark for both active and fixed income portfolios. It is expected that the tracking error of the portfolio versus this benchmark, defined as the annualized standard deviation of excess returns, will be kept below 2%.

INVESTMENT GUIDELINES

Types of Securities

Eligible investments will be limited to fixed income ETFs, plus individual U.S. Treasury, US Government Agency, and US Corporate notes and bonds. A list of eligible ETFs is attached in the appendix of this document. The ETFs on the eligible investment list must limit their underlying holdings to U.S. dollar denominated fixed income securities. ETFs containing corporate bonds or loans rated below investment grade by either Moody's or Standard and Poor's are eligible, but the total portfolio exposure to non-investment grade bond and loans will be limited to no more than 10% of the portfolio.

Prohibited Investments

Classes of investments that cannot be included in the portfolio are:

- 1. Short sales of any securities
- 2. Margin purchases or other use of lending or borrowing.
- 3. Short ETFs
- 4. Private placements
- 5. Leveraged derivatives
- 6. Equity securities and warrants
- 7. Individual municipal bonds
- 8. Individual Agency or Commercial mortgage-backed securities
- 9. Individual Asset-Backed securities

Use of options for risk management:

Investment in options is allowed subject to the following limitations. U.S. Treasury options may be used for hedging purposes only. They cannot be used to synthetically create leverage in the Fund. The Fund may not write options, unless the written option is paired with an underlying holding or a purchased option, such that the maximum loss is limited to the initial premium paid or received. Options on the ETF AGG may be used for risk control purposes. At no time should the exposure to loss associated with these instruments exceed 1% of the portfolio's market value.

Diversification

The Fund's fixed income investments should be well diversified to avoid undue exposure to any single fixed income sector, industry, or individual security. No more than 5% of the market value of the Fund may be invested in the securities of any one issuer, with the exception of the U.S. Treasury, U.S. Government Agencies, or a major ETF sponsor (e.g., iShares, Vanguard, SPDRs). For the purpose of evaluating the issuer concentration constraint, a look through analysis of ETF holdings will be done based upon the most recently published portfolio data about the ETF.

Individual corporate bonds rated BAA2 or higher by Moody's and BBB by Standard and Poor's may be purchased. The maximum exposure to any one issue at the time of purchase is either \$5,000 in face value or 0.5% of the market value of the portfolio, whichever is greater. The aggregate exposure to any one issuer is 5% of portfolio market value as outlined in the prior paragraph. The maximum time maturity when purchased is 10 years.

Fixed Income sector weights must be maintained within the following bands relative to the sector weights in the Fund's Benchmark. For the purpose of evaluating these sector weights, a look through analysis of ETF holdings will be done based upon the most recently published portfolio data about the ETF.

- U.S. Treasury Sector Weight within +/- 20% of the weight in the Benchmark
- U.S. Corporate Sector Weight within +/- 10% of the weight in the Benchmark
- U.S. Securitized Credit Sector Weight within +/- 10% of the weight in the Benchmark

Securitized Credit exposure will be limited to investments in U.S. Agency mortgage pass-through securities obtained solely through investments in fixed income ETFs that hold them.

Interest Rate Risk

The Fund's effective or option adjusted modified duration will be maintained within +/- 1 year of the of that metric for the Fund's Benchmark.

Liquidity

The student portfolio managers, in conjunction with the faculty member responsible for oversight of the Portfolio, will be responsible for maintaining adequate liquidity necessary in order to provide investment funds required to facilitate the learning experience of incoming securities analysts. Under normal conditions, cash balances are expected to be between 0.5% and 5% of portfolio assets. The majority of assets will be invested in other liquid assets, including ETFs and U.S. Treasury securities. The expectation is that all of the underlying holdings in the portfolio should be able to be liquidated within one week at no more than 20% of average daily volume in a normal functioning market environment.

Trading and Execution

While current school affiliations warrant the Fund's continued use of Fidelity Investments as broker, portfolio managers will use their best efforts to obtain the most favorable pricing and execution of trades. A list of individuals authorized to trade in the portfolio will be maintained and updated as needed. Currently, the three people authorized to place trades will be Kevin Maloney, the professor overseeing this program, Asli Ascioglu and Peter Nigro, who are also finance faculty members at Bryant University. Unless extreme market conditions require intervention, all trading will be done in response to explicit decisions made by the student portfolio managers.

MONITORING AND REPORTING

Reports on the performance of the Fund to the Advisory board will be produced monthly, and a full annual report will be published in conjunction with the Archway Equity fund each calendar year. These reports are published on the website for Archway fund and the Friends of the

Archway Investment Program Linked In page. The monthly and annual reports will include performance and risk data, holdings information, portfolio and benchmark characteristics, and performance attribution information. A committee of the student portfolio managers is responsible for the monthly commentary included in the reports and works with Professor Maloney on the overall content.

While the Fixed Income Portfolio Management class is in session, the current students in the program will be responsible for monitoring each position in the Fund. The portfolio will be maintained in the Bloomberg portfolio system, and the Archway Fixed Income Live Pricing and Attribution spreadsheet, which will enable the students involved in the program to monitor performance, and key risk exposures for the Fund and its Benchmark. In order to maintain the Fund's continued performance, monitoring of the portfolio will take place year-round. Prior to semester breaks, a strategy and a set of contingencies will be developed that will be executed in the event of significant market developments and explicit trigger points for contingency trades. During extended breaks, the faculty member responsible for Fund oversight will be responsible for monitoring the portfolio and taking defensive action when warranted by market conditions, or portfolio objectives and guidelines.

Appendix: List of Eligible Fixed Income ETF Investments

Additional ETFs may be added to this list from time to time as long as they fit within the investment guidelines of the Fund. All such additions will be subject to approval by the Advisory Committee for the Fund.

Ticker	Name	Description
AGG	iShares Aggregate Bond ETF	Index tracking portfolio consisting of
		investment grade rated core bonds
		denominated in USD and issued in US capital
		markets.
SHY	iShares 1-3 Year Treasury ETF	Index tracking portfolio consisting of U.S.
		Treasury securities with remaining maturities
		between 1 and 3 years.
IEI	iShares 3-7 Year Treasury ETF	Index tracking portfolio consisting of U.S.
		Treasury securities with remaining maturities
		between 3 and 7 years.
IEF	iShares 7-10 Year Treasury ETF	Index tracking portfolio consisting of U.S.
		Treasury securities with remaining maturities
		between 7 and 10 years.
TLH	iShares 10-20 Year Treasury ETF	Index tracking portfolio consisting of U.S.
		Treasury securities with remaining maturities
		between 10 and 20 years.
TLT	iShares 20+ Year Treasury ETF	Index tracking portfolio consisting of U.S.
		Treasury securities with remaining maturities
		of more than 20 years.
MBB	iShares Agency MBS ETF	Index tracking portfolio consisting of Mortgage
		Pass-through securities issued by Fannie Mae
		and Freddie Mac
GVI	iShares Intermediate	Index tracking portfolio designed to track the
	Government/Credit ETF	Bloomberg Barclays Intermediate U.S.
		Government/Credit index
	1	1

CIU	iShares Intermediate Credit ETF	Index tracking portfolio designed to track the
		Bloomberg Barclays U.S. Intermediate Credit
		index
CSJ	iShares 1-3 Year Credit ETF	Index tracking portfolio designed to track the
		Bloomberg Barclays 1-3 Year Credit index
SLQD	iShares 0-5 Year Corporate ETF	Index tracking portfolio consisting of U.S.
		Investment Grade Corporate Bonds with
		remaining maturities between 0 and 5 years.
STIP	iShares 0-5 Year TIPS ETF	Index Tracking portfolio designed to track U.S.
		Treasury Inflation Protected Securities with
		remaining maturities between 0 and 5 years
HYG	iShares iBoxx High Yield	Index Tracking portfolio designed to track the
	Corporate Bond ETF	Markit iBoxx Liquid High Yield Index
FLOT	iShares Floating Rate Bond Index	Index Tracking portfolio consisting of floating
		rate bonds issued by US corporations rated
		investment grade with remaining maturities
		less than 5 years.
SIPE	SPDR Bloomberg Barclays 0-5	Index Tracking portfolio designed to track U.S.
	TIPS ETF	Treasury Inflation Protected Securities with
		remaining maturities between 0 and 5 years
TIPX	SPDR Bloomberg Barclays 1-10	Index Tracking portfolio designed to track U.S.
	TIPS ETF	Treasury Inflation Protected Securities with
		remaining maturities between 1 and 10 years
SPTS	SPDR Bloomberg Barclays Short	Index tracking portfolio designed to track the
	Term Treasury ETF	Bloomberg Barclays Short Term Treasury
		index
ITE	SPDR Bloomberg Barclays	Index tracking portfolio designed to track the
	Intermediate Term Treasury ETF	Bloomberg Barclays Intermediate Term
		Treasury index
	1	

SPMB	SPDR Bloomberg Barclays	Index tracking portfolio designed to track the
	Mortgage-Backed Bond ETF	Bloomberg Barclays Mortgage-Backed
		Securities Index
SPSB	SPDR Bloomberg Barclays Short	Index tracking portfolio designed to track the
	Term Corporate Bond ETF	Bloomberg Barclays U.S. Short Term
		Corporate Bond index
SPIB	SPDR Bloomberg Barclays	Index tracking portfolio designed to track the
	Intermediate Corporate ETF	Bloomberg Barclays U.S. Intermediate
		Corporate Bond index
SPLB	SPDR Bloomberg Barclays Long	Index tracking portfolio designed to track the
	Term Corporate ETF	Bloomberg Barclays U.S. Long Term
		Corporate Bond index
JNK	SPDR Barclays Capital High	Index tracking portfolio designed to track the
	Yield Bond ETF	Bloomberg Barclays High Yield Corporate
		Bond index
BKLN	PowerShares Senior Loan ETF	Index tracking portfolio designed to track the
		S&P/LSTA U.S. Leveraged Loan 100 index
USIG	iShares Broad US Corporate	Index tracking portfolio designed to track an
	Bond Index ETF	index consisting of US corporate bonds rated
		investment grade.
IGSB	iShares 1-5 Year Investment	Index tracking portfolio designed to track an
	Grade Corporate Bond ETF	index, consisting of 1-5 year maturity US
		corporate bonds rated investment grade.
IGIB	iShares 5-10 Year Investment	Index tracking portfolio designed to track an
	Grade Corporate Bond ETF	index, consisting of 5-10 year maturity US
		corporate bonds rated investment grade.
IGLB	iShares 10+ Year Investment	Index tracking portfolio designed to track an
	Grade Corporate Bond ETF	index, consisting of 10+ year maturity US
		corporate bonds rated investment grade.
	1	1

EAGG	iShares ESG Aware US	Index tracking portfolio designed to track the
	Aggregate Bond ETF	Bloomberg Barclays MSCI US ESG Focus
		Index.
SUSC	iShares ESG Aware USD	Index tracking portfolio designed to track the
	Corporate Bond ETF	Bloomberg Barclays MSCI US Corporate ESG
		Focus Index.
SUSB	iShares ESG Aware 1-5 year	Index tracking portfolio designed to track the
	Corporate Bond ETF	Bloomberg Barclays MSCI US Corporate 1-5
		year ESG Focus Index.