

Oneida Tribe of Indians of Wisconsin

BUSINESS COMMITTEE



Oneidas bringing several hundred bags of corn to Washington's starving army at Valley Forge, after the colonists had consistently refused to aid them.



UGWA DEMOLUM YATEHE
Because of the help of this Oneida Chief in cementing a friendship between the six nations and the colony of Pennsylvania, a new nation, the United States was made possible.

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BC Resolution # 4-06-05-A

Adoption of Oneida Tribe of Indians of Wisconsin Investment Policy Statement

WHEREAS, the Oneida Tribe of Indians of Wisconsin is a federally recognized Indian government and a treaty tribe recognized by the laws of the United States of America; and

WHEREAS, the Oneida General Tribal Council is the governing body of the Oneida Tribe of Indians of Wisconsin; and

WHEREAS, the Oneida Business Committee has been delegated the authority of Article IV of the Oneida Tribal Constitution by the General Tribal Council; and

WHEREAS, the Tribe currently has an investment statement policy which was adopted by the Oneida Business Committee in the early 1990's; and

WHEREAS, the Investment policy statement incorporates the Tribe's investment philosophy, goals and objectives and includes the roles and responsibilities of all parties; and

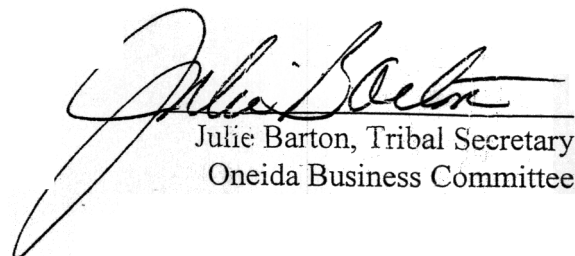
WHEREAS, the Oneida Business Committee wishes to adopt an updated and revised investment policy statement.

NOW, THEREFORE BE IT RESOLVED, that the attached *Oneida Tribe of Indians of Wisconsin Investment Policy Statement* is hereby adopted.

Certification

I, the undersigned, as Secretary of the Oneida Business Committee, hereby certify that the Oneida Business Committee is composed of 9 members of whom 5 members constitute a quorum. 8 members were present at a meeting duly called, noticed and held on the 6th day of April, 2005; that the foregoing resolution was duly adopted at such meeting by a vote of 6 members for;

0 members against; and 1 member not voting; and that said resolution has not been rescinded or amended in any way.


Julie Barton, Tribal Secretary
Oneida Business Committee

Article I. Purpose and Policy
Article II. Adoption, Amendment and Repeal
Article III. Definitions
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ONEIDA TRIBE OF INDIANS OF WISCONSIN INVESTMENT POLICY STATEMENT

Article I. Purpose and Policy

- 1-1. The purpose of this policy statement is to provide a clear understanding between the Oneida Tribe of Indians of Wisconsin (Tribe) and its selected Investment Consultant, money managers custodians and other interested parties concerning the investment policies and objectives of the Tribe. The overall philosophy will be outlined and will have enough flexibility to allow for changing market conditions.

Article II. Adoption, Amendment and Repeal

- 2-1. This policy statement is adopted by the Oneida Business Committee, following an adoption by the Finance Committee.
- 2-2. Amendments to this policy statement are allowed, as needed, by a majority vote of the Finance Committee and of the OBC, and any such amendment will be forwarded in writing to the Chief Financial Advisor.
- 2-3. All other policy statements which are inconsistent with this policy statement are hereby repealed unless specifically re-enacted after adoption of this policy statement.

Article III. Definitions

- 3-1. This article shall govern the definitions of words and phrases as used herein. All words not defined herein shall be used in their ordinary and everyday sense.
- 3-2. "Prudent Man Rule" means all parties are subject to the Prudent Man Rule which states: Assets shall be invested with the care, skill, prudence, and diligence under the circumstances prevailing from time to time that a prudent man acting in a like capacity and familiar with such matters would use in the investment of a fund of like character and aims.
- 3-3. "Equity" means stock certificate(s) representing ownership interest in a company/corporation.
- 3-4. "Short Term" means one to three year time frame.
- 3-5. "Long Term" means time frame longer than three years.
- 3-6. "Market Cycle" means the time period between the two latest highs or lows of the S&P 500 Index, showing net performance of a fund through both an up and a down market.
- 3-7. "Index" means a recognized grouping of securities used to measure the general performance of a market or market sector.
- 3-8. "Watch Status" means signifies concern over the recent performance of a selected money manager. Ensuing performance will be "watched" in a more guarded manner.
- 3-9. "Fixed income" means securities which represent promises to pay specific interest over specific periods of time, plus the principal investment.
- 3-10. "Compound" means adding the interest earned from an investment to its principal, so that it also earns interest in ensuing time periods.

Article IV. Roles and Responsibilities

Approved by Finance Committee:
February 25, 2005

Approved by Business Committee:
April 6, 2005

4- Oneida Business Committee

- a. The Oneida Business Committee (OBC) is charged with the authority in this Policy Statement to hire and fire investment managers with the advice and upon the recommendation of the Finance Committee. The OBC is responsible for all investments under management, but as a practical matter, will delegate day-to-day management of the assets to the Finance Committee, the Chief Financial Advisor, or to money managers and consultants hired for that purpose.

Treasurer

- a. The Treasurer is charged with maintaining fiduciary responsibility for all funds governed by this Policy Statement. The Treasurer shall report to the Business Committee, or cause to be reported, the performance of investment portfolios governed by this policy statement on at least a quarterly basis.

Finance Committee

- a. In support of the Treasurer, the Finance Committee is charged with the direct oversight of money managers when hired, asset allocation of the Tribe's funds and oversight of outside consultants hired to assist the above. As a practical matter, the Committee may assign day-to-day management to the Chief Financial Advisor.

4-4 Finance Department

- a. The Finance Department serves as the main point of contact for the Tribe and its selected consultants and money managers. The Finance Department will monitor and report to the Finance Committee. Responsibilities will include negotiation of fees on behalf of the Tribe and coordination of presentations by the consultant or money managers to the OBC or the Finance Committee, and review and provide recommendation for policy updates to the Finance Committee.

4-5 Consultants

- a. The Oneida Business Committee may hire an investment broker or financial planner to perform duties which include, but are not limited to, advice on asset allocation, screening and day-to-day monitoring of money managers, independent reporting of investment results, and any other duties the Board or the Committee deems appropriate.

Article V. Objectives

- 5-1. The Tribe seeks to maximize income, growth of income, and long-term appreciation of capital while seeking to minimize principal fluctuations. The assets must be invested with care and diligence with the overriding prudent man rule as a guide to investment management. The Tribe will, as a general guideline, make occasional disbursements, and care should be taken to ensure available funds.

- a. Equity fund objectives.
 - 1. Long term objectives.
 - (a). The Tribe seeks as a total return (income and growth) over a market cycle, or at a minimum of three years, a compounded return that should equal or surpass an agreed-upon recognized Equity Index that will parallel the style of the equity manager. Underperforming the three-year return of the selected equity index for three consecutive quarters will result in the manager being placed on a watch status.
 - 2. Short term objectives.
 - (a). The assets should be managed in such a fashion so that each manager should outperform the benchmark index in at least 50% of the quarters that the benchmark index shows a negative return.

- b. Fixed income objectives

Long term objectives.

(a). The Tribe seeks as a total return (income and growth) over a market cycle, or at a minimum of three years, a compounded return that should equal or surpass the Lehman Brothers Government/ Credit Intermediate Bond Index. If appropriate, the Finance Committee may use, in addition to the Lehman Brothers Government/ Credit Intermediate Bond Index, other recognized fixed income indices that may more closely parallel the style of the fixed income manager. Underperforming the three-year return of the selected index for three consecutive quarters will result in the manager being placed on a watch status.

2. Short term objectives.

(a). The Merrill Lynch Government/Corporate 1 to 3 year Bond Index shall be used to measure performance of any short term fixed income manager. The assets should be managed in such a fashion so that each manager should outperform the benchmark index in at least 50% of the quarters that the benchmark index shows a negative return.

3. Cash and equivalent objectives.

(a). It is expected that equity and fixed income managers will be generally fully invested. Cash that is allocated by the Finance Committee will be subject to the rules described herein.

Article VI. Asset Allocation

6-1. Asset allocation of the Tribe will be derived through the use of optimization techniques that consider the risks, expected returns, and correlation's of various asset classes.

a. The following general guidelines will be used to govern the overall asset allocation of the Fund:

	Minimum	Maximum
Equities	10%	70%
Bonds	20%	65%
Cash	none	70%

b. If separate portfolios are used, the following allocation restrictions based on the total value of the Equity Fund will apply:

	Minimum	Maximum
Large Value Equity	25%	75%
Large Growth Equity	25%	75%
Small Cap Equity	5%	25%
International Equity	5%	25%

6-2 The Finance Committee must evaluate and adjust the portfolio when any asset class exceeds its limits by 5% of the total fund value for two consecutive quarters. The Finance Committee has the authority to change the Minimum and/or Maximum and to Add and/or Delete portfolios.

6-3 The Finance Committee will review the asset allocation guidelines at least every three years, and may adjust the guidelines to meet the changing needs of the Tribe.

6-4 Each manager when hired will have up to three months to bring the portfolio to a "fully invested" status. Uninvested balances will be held in an interest bearing account.

The Finance Committee will make the overall allocation of equities, fixed income and cash investments as they deem appropriate. The worst-case scenario of the allocation model shall reach a point of no expected losses over a five year period of time.

The investment managers will have discretion, within the guidelines and prohibitions in this article to make individual security and industry decisions within their own discipline. The prudent man rule will apply to both individual securities and industry/sector weightings.

Equity securities.

a. The equities managers may not exceed 5% (at cost; 8% at market value) of managed portfolio to be concentrated in any one security.

b. The managers may not exceed 15% (at cost; 25% at market value) of managed portfolio to be concentrated in any one industry sector. The managers will divest of a portion of the securities in a sector if the concentration in that sector exceeds 25% of market value for more than one full calendar quarter.

6-8. Fixed Income.

a. Fixed income securities may be either U.S. Government and its Agencies, municipal debt, corporate debt and preferred securities as well as convertible issues issued only in U.S. dollars. The minimum quality credit rating for non-convertible debt is "BBB" rated.

b. In addition, a maximum of 20% of the portfolio may be in Mortgage Backed Securities that either implicitly or explicitly have the backing of the U.S. Government.

c. Asset Backed Securities may be a maximum of 10% of the portfolio, but must constitute Senior Debt with a minimum "AA" rating.

d. The Manager will maintain a portfolio duration of + or - 30% of the agreed upon benchmark index.

6-9. Cash and equivalents.

a. Cash and Cash Equivalents may be invested directly in the money markets in Commercial Paper, Bankers Acceptance, Bank CD's, and Corporate Notes with a minimum rating of A-1 by Standard & Poor's or P-1 by Moody's Investment Services. Maturities may not exceed 90 days.

b. In place of, or in addition, cash may be invested in money market mutual funds which have the same general investment restrictions as in 6-9.a..

c. All cash and equivalent investments must be in US dollars.

6-10 Prohibitions.

a. The money managers are prohibited from investing in letter stock, private placements, options, short sales, margin transactions, financial futures, commodities, or other specialized activities, unless specifically authorized by the Oneida Finance Committee. No fund assets should be invested in speculative securities. With permission of the Finance Committee some speculative securities may be allowed for the purpose of reducing overall risk in the portfolio.

b. Additionally, specific Collateralized Mortgages that are Interest & Principal Only Strips (I/O's, P/O's). Inverse Floaters. Z-Bonds, and Accruals are strictly prohibited.

c. Socially Responsible Investing: The Tribe recognizes the responsibility to invest in a manner that does not enable harm to the environment or the spiritual and cultural values of Native Americans. The Tribe prefers to invest in companies that make positive contributions to alleviating the problems facing society and the environment. Further, the Tribe intends to utilize its funds for the benefit of its people, while attempting to avoid supporting certain businesses that engage in practices which the Tribe deems harmful. Some of these practices are as listed below:

1. The destruction of rain forests.

- 2. Heavily polluting industries.
- d. Investments not specifically addressed by this policy statement are forbidden without the Finance Committee's written consent. The Finance Committee may amend these prohibitions as deemed necessary.

Article VII. Communications

7-1. Meetings between the OBC and the consultant and/or money managers will be held on an annual basis at a location selected by the OBC. The performance of investments will be evaluated quarterly. Investment reviews will be sent quarterly to the Chief Financial Advisor, who will disseminate to the Finance Committee, and the consultant and/or money managers must be available for phone consultation on an as needed basis.

APPROVED:


FINANCE COMMITTEE CHAIRPERSON

4/11/05
DATE


ONEIDA TRIBAL SECRETARY, JULIE BARTON

4/8/05
DATE