STATE TEACHERS RETIREMENT SYSTEM OF OHIO

OHIO INVESTMENT MANAGER AND BROKER POLICY AND PROGRAM

INTRODUCTION

As required by Substitute Senate Bill 133, the Board of the State Teachers Retirement System of Ohio hereby creates a policy and program with the goal to increase the utilization of Ohio brokers and investment managers. Even prior to the passage of this bill, the Board has been a proponent of using Ohio firms and Ohio residents to manage STRS Ohio investments and execute STRS Ohio investment transactions. For more than 15 years the Board has had an Ohio and Emerging Brokerage Firm Program to increase utilization of Ohio brokers, as well as brokers that are owned and controlled by minorities and/or women. In addition, for many decades the Board has internally managed a substantial portion of STRS Ohio's investment portfolio. The Board currently employs approximately 115 associates as investment staff, who are residents of the State of Ohio, pay income taxes to the State of Ohio and support the economy of the State of Ohio. The Board's internal investment management and operation is effectively the equivalent of an "Ohio-qualified" investment manager. This Ohio Investment Manager and Broker Policy and Program is intended to enhance those efforts already taken by the Board to use Ohio firms and Ohio residents to manage STRS Ohio investments and execute STRS Ohio investment transactions.

BROKERS

Brokers who execute securities transactions on behalf of the Board are subject to an evaluation, selection, and use process conducted by the investment staff and reviewed by the Board on a semiannual basis. This process is commonly known as the "Broker Evaluation." The Board reaffirms and ratifies the existing criteria and procedures used in the Broker Evaluation, which includes those items set forth in Ohio Revised Code Section 3307.152(C). The Board also reaffirms and ratifies the Broker Evaluation process to review the performance of brokers used to execute security transactions, which is required by Ohio Revised Code Section 3307.152(D)(2). Those brokers selected by the investment staff in the Broker Evaluation constitute the approved broker list.

Adding Ohio Qualified Brokers to the Approved Broker List

The Board will qualify brokers as "Ohio" brokers through a process developed by the combined efforts of the Ohio retirement systems. Any Ohio-qualified broker will also be subject to selection and evaluation criteria and procedures contained in the Broker Evaluation. Ohio-qualified brokers selected by the investment staff in the Broker Evaluation will be added to the approved broker list. The Board has a goal to increase the use of Ohio-qualified brokers for the execution of domestic equity and fixed-income securities transactions, when the services that Ohio-qualified brokers provide are equal in quality, cost, scope and execution capabilities to all brokers approved to transact securities transactions on behalf of STRS Ohio. In the Broker Evaluation, the investment staff will identify Ohio-qualified brokers that will receive an increased allocation for the next six-month investment period.

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Maintaining the Ohio and Emerging Brokerage Firm Program

The investment staff maintains a list of brokers who qualify for the Ohio and Emerging Brokerage Firm Program. Those brokers are eligible to be included on the approved broker list as long as those brokers receive research votes and/or meet the minimum criteria necessary to be included on the approved broker list. The specific process and factors by which these firms are selected are described in the Ohio and Emerging Brokerage Firm Procedures.

INVESTMENT MANAGERS

Since STRS Ohio investment staff manages a substantial portion of the STRS Ohio investment portfolio internally, only limited opportunities exist to use external investment managers, including Ohio-qualified external investment managers. However, pursuant to Substitute Senate Bill 133, the Board has a goal to increase the use of Ohio-qualified investment managers for the investment of STRS Ohio funds, when an Ohio-qualified investment manager offers quality, cost, services, safety and investment products comparable to other investment managers otherwise available to the Board. The Board will qualify investment managers as "Ohio" investment managers through a process developed by the combined efforts of the Ohio retirement systems. From this process, the Board will develop a list of Ohio-qualified investment managers and their investment products. All Ohio-qualified investment managers will be subject to the same investment manager search process conducted by investment staff as are other investment managers. The investment staff currently has the following search process for selecting investment managers to manage STRS Ohio funds for a particular investment product:

- 1. Investment staff obtains from the Board's investment consultant input into investment managers who fit within the investment staff goals and are open for new allocations.
- 2. Investment staff advertises the Request for Proposal in two nationally recognized investment publications and on the STRS Ohio website.
- 3. Investment staff narrows the list of prospective managers to approximately two times the number of investment managers to be hired.
- 4. Investment staff interviews the finalists and makes a recommendation to the deputy executive director—Investments and the executive director.

To increase the opportunities for Ohio-qualified investment managers when investment staff conducts an investment manager search, investment staff will advertise its investment manager search in two nationally recognized investment publications and on the STRS Ohio website. In addition to those investment managers whom the investment staff has selected to be on the final interview list through the current process, investment staff will add to the final interview list at least one Ohio-qualified investment manager who offers the investment product sought by investment staff and responds to the request for proposal.