Varied regulatory impacts caused by Basel III, Money Market (2a-7) Rule changes, Dodd-Frank, and the supply/demand dynamics for high-quality securities suggest that it may be time to review your investment guidelines. This review will allow you to re-evaluate whether your current cash management options fully reflect investment considerations available today and in the near future. In some cases, no investment policy changes will be required, but a closer look may reveal additional investment opportunities and possible language revisions.

We offer some ideas for consideration below that are designed to highlight general investment policy content to revise along with the various short-term investment products and the concept of defining your liquidity “buckets” with an active segmentation strategy by tiering your short-term investments based on current and forecasted cash requirements.

General Investment Policy Considerations

- Make sure your investment policy is broad enough to incorporate all money market fund classifications and operational requirements. For example, it is important to include language that allows for floating NAVs, direct securities, money market mutual funds, short duration mutual funds, private funds and/or short duration separate accounts.

- Accredited investors and qualified purchasers may want to consider adding the use of a private fund(s).

- A tiered investment approach may allow you to subscribe to a specific objective for each “liquidity bucket” (see illustration on tiering cash).

- Is a National Recognized Statistical Ratings Organization (NRSRO) a requirement for you to assess the investment suitability of your cash investments? If so, you may want the investment policy to include the requirement without a reference to a specific NRSRO to provide greater investment flexibility.

- Are you currently in dialogue with your bank(s) relative to their appetite for deposits? What are their plans in the short and long-term for deposits and anticipated Earnings Credit Rate (ECR) rates?

- Are there assets that require access to non-U.S. dollar currencies?
# Investment Policy Language

## Considerations for Cash Management Products

<table>
<thead>
<tr>
<th>Cash Management Solution</th>
<th>Samples of Existing Investment Policy Language</th>
<th>Proposed Revisions to Investment Policy Language</th>
<th>Benefits of Amendment</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Domestic Money Market Funds</strong></td>
<td>Money market mutual funds that seek to maintain a constant net asset value, or money market funds</td>
<td>Institutional prime, government and municipal money market funds that are subject to Rule 2a-7 of the Investment Company Act of 1940 as amended from time to time.</td>
<td>Allows cash investments into a broader range of vehicles – gives you the most flexibility in a range of economic cycles.</td>
</tr>
<tr>
<td><strong>Offshore Money Market Funds</strong></td>
<td>You may currently have them listed by currency or in US Dollars</td>
<td>TBD — post reform updates as they evolve.</td>
<td></td>
</tr>
<tr>
<td><strong>Private Funds</strong></td>
<td>Some investment policies do not specifically address these funds.</td>
<td>Private funds that have specific limits regarding the maximum duration, credit quality and whose underlying securities meet your investment guidelines.</td>
<td>Allowing investment in unregistered vehicles provides an opportunity to take advantage of funds that may offer daily liquidity, that strive to maintain a $1.00 NAV and offer portfolio diversification in a professionally managed pool.</td>
</tr>
<tr>
<td><strong>Ultra Short Income Mutual Funds</strong></td>
<td>Ultra-Short Bond mutual funds.</td>
<td>Ultra-short bond funds that limit duration to ____ years, have a maximum average weighted maturity of ____ days and have a minimum credit rating of _________.</td>
<td>This language encourages you to define and understand the fund’s risk profile. This requires the support of your firm to embrace a “total return” philosophy on your investment.</td>
</tr>
<tr>
<td><strong>Separately Managed Accounts</strong></td>
<td>Some investment policies do not include these. In the event that you tier your cash, they may provide additional control and potential performance based upon your goals and risk appetite.</td>
<td>Please see an illustration of a checklist below. This tool provides you with a quick way to review your risk, duration, and credit tolerations.</td>
<td>Allows for strategic investing based on your cash flow and liquidity needs. Increases your control since the account is invested based upon your specific investment guidelines and criteria.</td>
</tr>
</tbody>
</table>
Investment Policy Guidelines for Liquidity Management

Considerations When Evaluating Your Investment Policy Statement

The below checklist is intended to provide a framework to assist you in consultation with your counsel in developing and drafting an investment policy statement. This checklist is provided for informational and discussion purposes only.

- Goal of every IPS should be to maximize investment returns while ensuring safety of principal and providing sufficient liquidity

- Determine available cash balances

- Tiers of cash — think about your cash in a new way
  - Operating Cash — basic daily cash flows (highly liquid)
  - Core Cash — medium or longer term needs (moderate liquidity)
  - Strategic Cash — focus on buy-and-hold strategy (minimal liquidity)

- Allowable investments to consider
  - Constant NAV MMF
  - Floating NAV MMF
  - Offshore Money Market Funds
  - Private Placements
  - Separately Managed Accounts
  - Ultra-Short Income Mutual Funds
  - Deposit Products
  - Self-Directed Fixed Income Securities
  - Time Deposits
  - Third-Party Time Deposits
  - Collateralized Agency Repos
  - U.S. Treasuries
  - Government Agencies
  - Commercial Paper — Domestic Issuers
  - Commercial Paper — Foreign Issuers
  - Corporate Securities
  - Repurchase Agreements
  - Commingled Funds
  - Asset Backed Commercial Paper (ABCP)

- Investment restrictions

- Credit and quality guidelines

- Percentage Exposure Limitations
  - Corporate
  - Financial Institutions
  - Pooled Product

- Maturity

- Average weighted maturity

- Duration

- NRSRO
  - Standard & Poor’s
  - Moody’s Investors Service
  - Fitch

- NAIC

- Identify employees authorized to make short-term investment decisions

- Glossary of investment terminology
Given the current cash management environment, institutional investors should be rethinking how to manage their cash. BNY Mellon Fixed Income Solutions offers a diverse set of products that may improve income and/or return potential across the spectrum of available cash pools — and with a lower risk profile than might be expected.

Creating an account plan using a “tiered” investment strategy can help break down your inventory of domestic and global cash to provide the necessary liquidity and income potential for your overall portfolio.

<table>
<thead>
<tr>
<th>TIER I</th>
<th>Operating Cash</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Basic, daily cash flows</td>
</tr>
<tr>
<td></td>
<td>• Ready liquidity</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>TIER II</th>
<th>Core Cash</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Specific targets for medium or longer term needs; capital calls, benefit payments, grant payments, debt servicing, overlay</td>
</tr>
<tr>
<td></td>
<td>• Moderate liquidity</td>
</tr>
<tr>
<td></td>
<td>• Pursues higher yields than tier I</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>TIER III</th>
<th>Strategic Cash</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Focus on total returns, construction costs, matched funding, capital calls, long-term horizon or a buy-and-hold strategy</td>
</tr>
<tr>
<td></td>
<td>• Minimal liquidity</td>
</tr>
</tbody>
</table>

**THINGS TO CONSIDER**

<table>
<thead>
<tr>
<th>Assessment of risk tolerance</th>
<th>Assessment of liquidity needs</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Time horizon</td>
<td>• Frequency</td>
</tr>
<tr>
<td>• Amortized cost vs. marked-to-market</td>
<td>• Amounts</td>
</tr>
<tr>
<td>• Scenario analysis</td>
<td>• Circumstances</td>
</tr>
</tbody>
</table>

**Balancing risk tolerance and investment flexibility will be the key to putting your cash to work.**

**Is it time to optimize and update your investment policies?**

If you have any questions regarding the above or if you need sales information, please reach out to your BNY Mellon Fixed Income Sales Representative.

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