MSRP Investment Contract Pool
Investment Policy and Guidelines

As of January 26, 2026

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I. Policy Statement, Investment Objectives, and Definitions

The purpose and objective of the Investment Contract Pool (the "ICP") is to provide participants in the Maryland State Employees Supplemental Retirement Plans (the "MSRP") with an investment vehicle that:

- emphasizes safety through preservation of principal and accrued income;
- provides benefit responsiveness for qualifying participant withdrawals at book value;
- credits a rate of interest that exhibits low volatility and tracks the general direction of interest rates;
- delivers as high a return as possible subject to these constraints;
- seek to outperform the Morningstar US CIT Stable Value Index over a full market cycle and
- provides diversification of portfolio holdings by product, security, and issuer.

Other definitions:

- the "Benchmark Index" means the index used for measuring duration exposure and book value returns.
- "Book Value Contract(s)" are, singly or collectively, benefit responsive investment contracts or investments such as General Account GICs, Separate Account GICs, BICs, Wrapper Agreements, or Stable Value Pooled Funds as further defined in section III, Investment Contract Pool Guidelines and Limitations.
- "Fixed Income Fund(s)" are, (excluding Short-Term Investment Fund(s)), singly or collectively, bank collective trusts or publicly registered mutual funds that primarily invest in fixed income instruments.
- "ICP Manager" means T. Rowe Price Associates, Inc., or a successor manager approved by the Board, the Stable Value Fund Manager of the entire ICP.
- "Short-Term Investment Fund(s) or STIF(s)" are, money market mutual funds or high quality/highly liquid bank collective trusts managed similarly to money market mutual funds and offered by, the ICP Manager, Sub-Manager, MSRPs designated custodian or trustee, or an affiliate of any of them (such short-term investment funds include, but are not limited to, the T. Rowe Price Cash Reserves Trust)
- "Sub-Manager" means either: (1) a manager of a Stable Value Pooled Fund (but not other products or pooled funds) that accepts an investment of MSRP ICP assets by the ICP; (2) a manager appointed by the ICP Manager under an investment management agreement to manage a Sub-Manager Account according to the guidelines as described under section V, Guidelines and Conditions for Underlying Book Value Contract Issuers; or (3) the ICP Manager with respect to assets managed by the ICP Manager in a Sub-

Manager Account.

- "Sub-Manager Account(s)" means a portion of the MSRP ICP assets that is allocated to a Sub-Manager, is covered by Wrapper Agreements, and is invested by the Sub-Manager either directly in fixed income instruments and/or in Fixed Income Funds that invest in fixed income instruments.

II. Investment Contract Pool Structure

Benchmark Index

The Morningstar US CIT Stable Value Index.

Overall Duration

The ICP's overall duration shall not be greater than 3.5 years.

The ICP's duration may occasionally be outside the limit established above due to reasons that include, but are not limited to, large cash flows due to participant activity, unusual changes to the payment characteristics of securities in the market, or tactical duration decisions of the ICP's Sub-Managers. When appropriate, the ICP Manager will attempt to bring the ICP back into compliance within a reasonable time period taking into account the ICP's projected liquidity needs.

III. Investment Contract Pool Guidelines and Limitations

Allowable Cash Vehicles and Book Value Investment Contracts

The ICP Manager may invest the assets of the ICP in an MSRP selected STIF or money market fund(s).

The ICP Manager may invest the assets of the ICP in the following Book Value Contracts, which are benefit responsive investment contracts that pay a fixed or floating rate of interest, have a fixed, variable, serial, or unspecified maturity date(s), and provide book value accounting and liquidity for certain participant-initiated withdrawals:

- **General Account Guaranteed Investment Contracts** ("General Account GICs") are issued by insurance companies and backed by the insurance company's general account.

- **Separate Account Guaranteed Investment Contracts** ("Separate Account GICs") are group annuity and other guaranteed separate account contracts (including, without limitation, contracts where the underlying insurance company separate account is managed by the insurer, an affiliate of the insurer, or a sub-manager selected by the ICP Manager) issued by insurance companies and backed by (a) assets held in a separate account established by the insurance company that are pledged to satisfy the obligations of the Separate Account GIC and (b) secondarily, by the assets of the general account of the insurance company. For purposes of these guidelines, the credit quality of the Separate Account GIC investment is the claims paying ability of the issuing insurance company.

- **Bank Investment Contracts** ("BICs") are issued by financial institutions other than insurance companies, such as banks, and backed by assets of the issuing bank or financial institution.

- **Wrapper Agreements** ("Wrapper Agreements") are issued by banks, insurance companies, or other financial institutions and cover an identifiable set of fixed income securities and are backed primarily by such fixed income securities held in a custody account in the name of the plan and to a lesser extent by the assets of the issuing institution. Wrapper Agreements also provide for the exchange of cash payments between the plan's custody accounts and the issuing institution, which include the wrapper fee, and may include payments made in connection with a withdrawal from the Wrapper Agreement as well as payments to the issuer in exchange for a guaranteed fixed or floating rate of interest. The terms of a Wrapper Agreement may limit the types of fixed income securities that are covered under the Wrapper Agreement. Certain Wrapper Agreements may also provide that the ICP Manager's role be limited to accepting or rejecting the purchase or sale of fixed income securities proposed under the terms of the Wrapper Agreement. In such cases, the issuing institution, or an affiliate thereof, proposes the purchase or sale and executes the purchase or sale of the fixed income securities once the ICP Manager has accepted such purchase or sale proposal. In all cases, any fixed income securities purchased in conjunction with Wrapper Agreements shall comply with these Investment Policy and Guidelines.

- **Stable Value Pooled Funds** ("Stable Value Pooled Funds"), also known as stable value commingled funds, stable value bank pooled funds, or stable value collective funds, are bank collective trusts that allow investment by multiple qualified, though unaffiliated, plans through the commingling of assets in a trust that primarily purchases GICs and other book value investment contracts to provide benefit responsiveness and principal stability. Stable Value Pooled Funds must be benefit responsive, typically maintain duration between 1.5 and 3.5 years, have a fee structure comparable to market levels, and at the time of purchase be rated a minimum of A+ (weighted average of the underlying fixed income assets). Also, at the time of purchase, Stable Value Pooled Fund Sub-Managers must have a minimum of assets under management of $250 million, a 5-year track record of managing stable value products, and competitive historical performance.

Average credit quality for the overall ICP (weighted average of the underlying fixed income assets):

The ICP Manager will manage the overall portfolio with an average credit quality of the equivalent of A+ or higher for the ICP investments. If the average credit quality of the ICP investments falls below the equivalent of A+, using a generally accepted process for measuring the market value weighted average credit quality deemed appropriate by the ICP Manager, the ICP Manager shall take corrective action to restore such average credit quality to the equivalent of A+ or better within 60 days.

Maximum exposure to Book Value Contract issuers at time of purchase – Diversification Requirements

	Maximum Exposure
BIC issuer	3%
General Account GIC issuer	7%
Separate Account GIC issuer	35%
Wrapper Agreement issuer	35%
Stable Value Pooled Fund	25%

It is understood the above are maximum exposures, not target exposures, and the ICP Manager will normally not exceed the book value issuer maximum exposure as listed above for the ICP's investments at time of purchase. However, the ICP Manager may find it necessary to exceed the maximum exposures listed above due to reasons that include, but are not limited to, Book Value Contract issuer credit events, changes in Book Value Contract market conditions, or lack of supply in the Book Value Contract markets; in which case, the ICP Manager will report such event and provide subsequent exposure updates in its quarterly reports to the MSRP Board until such exposure is again within the Investment Policy limits.

IV. Guidelines and Conditions for Underlying Book Value Contract Issuers

Material conditions for Book Value Wrapper Agreements, BICs, Separate Account GICs,and General Account GIC providers at time of purchase:

Minimum Book Value Contract Issuer Credit Quality

The minimum quality rating of Wrapper Agreement, BICs, Separate Account GICs, and General Account GIC providers must be A- or equivalent by at least one Nationally Recognized Statistical Rating Organization ("NRSRO") at the time of the initial placement. In the case of a split rating on investment contracts, the higher rating shall apply.

Book Value Contract Issuers Requirements:

- provide book value accounting statements in compliance with applicable accounting standards
- pass ICP Manager internal credit screen
- provide a competitive fee (for wrapper)
- provide a competitive rate (for GIC provider)
- have a complete understanding and sign off on withdrawal hierarchy

- maintain competent backroom operation (statements/monitoring/rate reset)
- maintain the ability to interact with custodian(s), trustees
- issues contracts from a US-domiciled entity or subsidiary
- provide the Plan the right to discontinue Wrapper Agreement/Separate Account GIC contracts by extended book value settlement with a maximum termination period not exceeding the greater of (i) five years or (ii) portfolio duration plus two years.

Desired Wrapper Agreement/Separate Account GIC contract terms

The ICP Manager will endeavor to negotiate some or all of the terms listed below in the Wrapper Agreements/Separate Account GIC contracts for placement in the ICP. However, the ICP Manager may not be successful in obtaining the below terms due to reasons that include, but are not limited to, Book Value Contract market conditions or lack of supply in the Book Value Contract markets.

- 0% minimum crediting rate (guarantee of principal)
- Benefit-responsive for following participant events:
    - participant withdrawals (including terminations and layoffs subject to applicable book value corridor limits)
    - participant inter-fund transfers
    - loans (if allowed by Plan)
    - annuity purchases
- Clone contract provision.
- Reasonable provision for dealing with impaired securities.
- Industry standard definition of competing fund definition and equity wash rule
- Seek book value corridor for employer or sponsor level withdrawals (including those resulting from layoffs, early retirement, or other work force reduction programs) of at least 5% - ideally at 10% or higher.
- Plan right to discontinue within 60 days for no reason with selection of termination of wrap contract (at market value).
- Wrapper Agreement issuer may not discontinue contract without cause, except, at the Plan’s election, pursuant to book value extended termination provisions.
- Fee guarantee over specific period.

V. Guidelines and Conditions for Underlying Sub-Managers and Sub-Manager Accounts

These restrictions do not apply to (i) Fixed Income Funds selected by a Sub-Manager, but not under the control of the Sub-Manager or (ii) Short-Term Investment Funds.

Fixed Income Funds:

Fixed Income Funds may be used as investments either as all or a portion of a Sub-

Manager Account. A Sub-Manager Account which invests in a Fixed Income Fund must meet the overall material conditions for Sub-Managers and other requirements specified in this section V; but minor deviations from these rules caused by a Fixed Income Fund investment shall not be considered a violation of the Investment Policy. To the extent that the ICP Manager directs a Sub-Manager to invest in one or more Fixed Income Funds, the ICP Manager is responsible for approving and monitoring the use of each such Fixed Income Funds and shall take appropriate steps to liquidate the ICP's investment in such fund if its activity, management, or investment composition changes so that it is no longer an appropriate investment vehicle for the Sub-Manager Account.

Material conditions for underlying Sub-Managers:

- a demonstrated track record of managing separate account insurance instruments or fixed income portfolios
- at time of Sub-Manager appointment, fixed income performance in the top-half of an appropriate consultant universe for a 3 or 5 year time period (not applicable to index, index-plus, or enhanced index strategies)
- at time of Sub-Manager appointment, fixed income performance exceeding the benchmark for a 3 or 5 year time period (not applicable to index strategies)
- 5 years of experience managing fixed income strategies
- ability to provide liquidity as stated in the wrap agreement or insurance contract without disrupting the total return objective

Credit quality requirements of Sub-Manager Accounts

- Average Portfolio Credit Quality = Equivalent of S&P A+, Moody's A1, or Fitch's A+ or higher (In determining such quality, the lower rating of each underlying security shall be used. If a security is rated by three agencies, then the middle rating will apply.)
- Minimum Single Security Credit Quality at the time of purchase (In determining such quality, the lower rating applies. If a security is rated by three agencies, then the middle rating will apply) = Equivalent of S&P BBB-, Moody's Baa3, or Fitch's BBB-
- Securities rated below A-/A3 (In determining such quality, the lower rating applies. If a security is rated by three agencies, then the middle rating will apply) will constitute no more than 25% of the portfolio
- Commercial paper must be rated at least A-1 by S&P or P-1 by Moody's

Primary credit ratings are those issued by S&P, Moody's, or Fitch. If a security is not rated by S&P, Moody's, or Fitch, (i) if the issuer of such security is rated, the rating of the issuer may be used; or (ii) if the security's rating is issued by another nationally recognized rating agency, the Sub-Manager will consult with the discretionary ICP Manager before purchase to ensure suitable equivalency; or (iii) the Sub-Manager will consult with the discretionary ICP Manager before purchase to ensure suitable equivalency.

All investment guidelines established with individual Sub-Managers will contain detailed "fallen-angel" provisions, identifying the course of action to be pursued by the Sub-Manager in the event that a security falls below the investment guideline credit minimums. In any case, such provisions will require the Sub-Manager to exercise prudence in the disposition of such assets.

Permissible investments in Sub-Manager Accounts

- Non-convertible bonds, notes, bills
- Variable and floating rate securities
- U.S. treasury securities and government-related securities such as agencies, municipals, supranationals, and sovereigns
- Agency and non-agency mortgage-related securities backed by loans secured by residential, multifamily or commercial properties
- Mortgage dollar roll and To-Be-Announced transactions are permitted provided that the forward settlement date on any mortgage transaction does not exceed 92 days from the trade date of the transaction.
- Corporate Debt instruments (including bank issued debt exempt from registration under 3(a)(2).
- Asset-backed securities
- Municipal securities
- U.S. and Yankee corporate securities
- Eurodollar and other U.S. dollar-denominated securities of U.S. and foreign issuers
- Derivative financial instruments - used only for hedging purposes or replication purposes, such as swaps, futures, and options on financial instruments. Derivative financial instruments may not subject the portfolio to greater risk than that to which it would be exposed if the underlying instruments were purchased directly in the cash markets. Investment in Fixed Income Funds that speculatively invest in swaps, options, or other derivative financial instruments is prohibited. Derivative financial instruments include treasury futures and credit derivatives (credit default swap, credit default swap index, commercial mortgages backed security index).
- Over-the-Counter ("OTC") derivatives financial instruments entered for hedging shall be fully supported by securities with like characteristics to those being hedged, Cash, U.S. Treasuries, or any combination of all three.
- OTC derivatives financial instruments entered for replication shall be fully supported by Cash, U.S. Treasuries, or a combination of the two in an amount equal to the notional amount of the OTC derivative financial instrument.
- Non-convertible preferred securities (other than payable-in-kind preferred securities)
- Rule 144A and Reg S securities
- Repurchase agreements
- Cash equivalents maturing in less than one year, commercial paper, certificates of deposit, banker's acceptances, repurchase agreements, and other money market instruments, money market funds, or STIF.
- Securities Lending ("Sec Lending"), within Fixed Income Funds only

Non-permissible investments in Sub-Manager Accounts

- Common/preferred stock
- Non-US dollar denominated securities
- Convertible bonds
- Short sales of physical securities
- Margin purchases
- Private or direct placements (excluding Rule 144A, Reg S, 3(a)(2) securities)
- Commodities
- Direct ownership of real estate or direct ownership of REITS (For the avoidance of doubt, debt instruments issued by REITS are permissible, subject to the ratings conditions of this Section V)
- Lending of securities, including Sec Lending if not within a Fixed Income Fund
- Derivatives used for speculative purposes (For avoidance of doubt, derivatives used for hedging or replication are permissible).
- Borrowing money, directly or indirectly, or creating leverage or leveraged positions in any form.

Additional information about certain investment terms

- "To-Be-Announced transactions" are contracts for the purchase or sale of agency residential mortgage-backed securities to be delivered at a future agreed-upon date.
- Rule 144A of the Securities Act of 1933 (the "Securities Act") provides an exemption from securities registration with respect to the offer and sale of securities to qualified institutional buyers inside the United States.
- Regulation S of the Securities Act exempts the offer and sale of securities outside the United States to qualified intuitional buyers both inside and outside of the United States.
- Rule 3(a)2 of the Securities Act exempts from registration under the Securities Act any security issued or guaranteed by a bank.
- Treasury futures are standardized contracts for the purchase and sale of U.S. government notes or bonds for future delivery. Treasury futures are sold on exchanges.
- Over-the-Counter derivatives financial instruments are financial contracts that do not trade on an asset exchange.
- Credit default swaps, or CDS, are credit derivative financial instruments that allow an investor to "swap" or offset credit risk, such as the default or bankruptcy of an issuer, with that of another investor.
- A credit default swap index, or CDX, is a benchmark financial instrument made up of credit default swaps.
- A commercial mortgage-backed securities index, or CMBX, are indices that track the prices of a basket of tranches in commercial mortgage-backed securities (CMBS).

Desired concentration limits on Sub-Manager Accounts

Securities exempt from registration pursuant to Rule 144A or Regulation S	35%
Securities exempt from registration under Regulation S	5%

Securities exempt from registration under Rule 3(a)(2)	5%
Single corporate Issue	2.5%
Single corporate Issuer	5%
Corporate Sector (total)	60%
Mortgage-backed Securities and Commercial Mortgage-backed Securities Sector (total)	60%
Asset-backed Securities Sector (total)	40%
U.S. Treasuries and Agencies Sector	100%
OTC Derivative financial instruments*	10%
Government-Related Sector (including Municipals, Supranationals, and Sovereigns)	45%
STIF, money market instruments and funds	100%
Interest Rate Swap Agreements	A notional value equal to 200% of the ICP assets under management*

* Any need for additional swap transactions used as a hedge against existing positions above this limit must receive express permission from the ICP Manager, which may be granted in its sole discretion.

*Exposure to Treasury Futures is limited to +/- one year and is expressed in terms of the contribution to duration of the Account attributable to such Treasury Futures. For this purpose, contribution to duration means the difference between the Account's duration disregarding the Treasury Futures and the Account's duration including the Treasury Futures.

Desired duration limits on Sub-Manager Accounts

Sub-Managers managing a Sub-Manager Account will constrain the variability of their respective account's duration to no more than ±20% from their respective assigned benchmark index, (e.g., if the index duration is 5.0 years, the Sub-Managers will manage their respective accounts to duration within 1 year of the index), unless otherwise authorized by the ICP Manager.

Concentration limits on Sub-Managers

The maximum exposure to any one Sub-Manager is to be limited to 35%. For the avoidance of doubt, this limit is not applicable to the ICP Manager.

VI. Other Considerations

Minority Business Enterprise status

A Minority Business Enterprise or MBE means a legal entity organized to engage in commercial transactions that is at least 51 percent owned and controlled by one or more minority persons. MBE also includes a nonprofit entity engaged in promoting the interests of persons with physical or mental disabilities. An MBE must be certified as such by the State of Maryland Department of Transportation.

In selecting Stable Value Pooled Fund providers, providers of Book Value Contracts, or any Sub-Managers and other ICP providers, the ICP Manager is authorized and directed to take MBE status into consideration, provided that in making any MBE provider selection, the ICP Manager determines that the investment return anticipated to be generated by an MBE provider is approximately commensurate to the returns anticipated from alternative providers offering products or strategies of commensurate risk.