Investment policy for Aalto University Student Union investments

1. Investment objective

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The investment activities of Aalto University Student Union (AYY) aim to invest the Student Union's assets responsibly to enable financial sustainability in AYY's activities. The objective of investments is both to support current activities and to secure the future of the Student Union. Therefore, the Student Union is aiming at reasonable return and performance for assets. The investment policy defines the long-term return objectives and risks of investments, and on their basis, the allocation of investments and suitable investment targets. The purpose of the investment policy document is to support and guide the Finance Board, asset managers and Financial Director in their work.

2. Structure of investment assets and decision-making

The student union assets include a) real estate assets intended to support AYY's activities and members, but not to generate investment income, and b) investment assets intended to support the student union activities (see the previous section). This policy focuses on investment assets that aim to generate return to support operations.

Investment assets include so-called tied funds (donations, the funds of which are used for a purpose decided by the donor, such as grants to a specific group of students or projects). The capital and return of these funds must be kept separate in the accounts but invested as part of the Student Union's investment assets.

For the sake of clarity, it is noted that cash reserves relating to real estate assets are invested as necessary and their investment is outlined in Appendix 1 to this policy.

3. Decision-making processes

The highest decision-making body of the Student Union is the *Representative Council*, which annually appoints the Student Union *Board* based on the proposal of the former of the Board. The Board has executive authority over the affairs of the Student Union. These two bodies are composed of Aalto University students. On the proposal of the Board, the Representative Council elects the *Finance Board* consisting of external specialist members and students.

The Finance Board is responsible for the management and administration of the Student Union assets and the preparation and implementation of matters prescribed in the rules of procedure and the Student Union's Administrative and Economic Regulation. The Finance Board is a major advisor or decision-maker in investment matters. The Finance Board serves as the supervisor of Financial Director. The role of the Finance Board and the decision-making processes related to finances are further regulated in Aalto University Student Union's Constitution and the administrative and economic regulation.

Within the Finance Board, there is an *investment section* which prepares investment decisions and policy guidelines for the decision of the entire Finance Board.

4. Time horizon of investments and need for liquidity

Investment activities are guided by the need for the Student Union to use funds for activities. The aim is to secure the needs of the Student Union by ensuring that a sufficient amount is available for operations in the near future in bank accounts and/or credit limits, which is currently approximately EUR 1 million.

The other time horizon for investment activities is long because the Student Union also seeks to ensure the preservation of asset value and, if appropriate, increase in value. The amount of funds used each year is small in relation to the value of the entire investment portfolio. Thus, a significant share of investment activities can be allocated to investments in which assets are committed for 5–10 years, and the investment horizon for a large part of the portfolio can be considered at least 5–10 years.

These time horizons are taken into account in the Allocation section of this investment policy.

5. Target rate of return

The target rate of return is defined as long-term return targets. In the short term, return may vary in accordance with the risk profile of the investment portfolio. An investment horizon of 5–10 years is considered a long term.

The long-term average annual real return target for investment assets¹ is 3.0 % p.a.

6. Allocation

A key tool in investment policy is investment allocation. The yield target and the risk appetite determine the allocation decision. AYY aims at achieving the return target by allocating investments in different asset classes based on their expected return and risk, so that the return target can be achieved through the selected allocation.

Expected yields at the end of 2021 were as follows (Investment Research Finland Ltd, a compilation of the views of Finnish asset managers):

	Basic
Interest	
Money market	-0.4 %
Government bonds	-0.3 %
Investment Grade	0.1 %
High Yield	2.1 %
Emerging market	2.9 %
Stock	
Finland	7.1 %
Europe	6.6 %
USA	6.8 %
Emerging market	8.2 %
Japan	6.5 %
Global	6.8 %
Alternative	
Private Equity	10.2 %
Private Credit	6.7 %
Property investments	4.5 %
Other alternatives	4.0 %

¹ Real return is calculated by deducting actual annual inflation from the nominal return on investment assets. At present, the European Central Bank's long-term inflation target is approx. 2%.

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The Student Union's investment assets are divided into Publicly listed liquid investments and Alternative investments as follows:

PUBLICLY LISTED LIQUID INVESTMENTS			80% OF AYY'S INVESTMENTS	Fluctuation margin 70-100%	
		The proportion of the class among the Publicly listed,		Target proportion of	Fluctuation
Portfolio	Asset class	%	Sub-category	the sub-class, %	margin, %
	Equity risk	60	Finland	7.5	0-12
			Europe	15	0-20
10			North America	17.5	0-25
ments			Japan, rest of the world	5	0-10
vest			Emerging market	15	0-20
Publicly listed liquid investments			Proportions in total	60	
sted	Debt risk	40	Money market	7.5	0-10
V sil			Government bond	10	0-15
Olicl			Corporate bond	12.5	0-17
Puk			High yield	5	0-10
			Emerging market	5	0-10
			Proportions in total	40	

ALTE	RNATIVE INVESTMENTS		20% OF AYY'S INVESTMENTS	Fluctuation margin 0-30%
Portfolio	Asset class	Sub-class	Target proportion of alternatives	Fluctuation margin, %
tive	Alternative	Equity investments	Max 60% of the alternatives	0-60
Alternative investments		Real estate funds	Max 60% of the alternatives	0-60
		Other	Max 60% of the alternatives	0-60

The most significant difference between investment classes is that the value data for Publicly listed liquid investments is obtained on a daily basis and less frequently for Alternative investments. These reports differ and risk indicators are different, among other things. Accordingly, the success of the investments is monitored on the basis of various reports.

The allocation of investments is defined through the minimum and maximum shares (the so-called allocation pipeline). Exceptions to the target allocation pipeline may be made exceptionally and for a justified, weighty reason by a decision of the Finance Board, for example, if the value of the assets

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deviates from the target allocation due to market turbulence, but it is not necessary to make corrective sales or purchases (since purchases would be unprofitable at the time of market turbulence). The Student Union's Representative Council and the Board are immediately informed of the allocation deviation. In this case as well, the aim is to return to investment policy allocation as soon as it is reasonable and possible in terms of investment activities.

The transition to Alternative investments takes an estimated 2-5 years (due to time diversification and careful selection, among other things), so the allocation may deviate from the target in the early years.

Alternative investments include funds that invest in investments for which there is no ongoing listing or market (for example, unlisted companies or private debt contracts). Funds may offer investors a redemption opportunity at certain times or upon request, but in principle, investments are made for the lifespan of the fund (generally 5–10 years). Some funds may be open-ended special mutual funds where units can be subscribed and redeemed several times a year. The Student Union's aim is to make alternative investments in a time-diversified manner so that funds returned from investments over time can be redirected to new investments smoothly. Investments are diversified to different types of investments, and the aim is also to achieve diversification benefits in relation to the overall portfolio of the Student Union.²

Alternative investments may also be implemented through a mandate or programme managed by an asset manager.

Real estate assets consistent with the main duty of the Student Union are significant. Accordingly, the Student Union considers that no direct investment in residential property is made in the portfolio of direct investment assets, including the related plots of land and other similar assets related to residential property. However, alternative investments may include funds that own other types of property or plots.

As stated in section Time horizon and structure of investment activities, a certain amount of liquidity is to be reserved for the student union activities. The availability of these assets is ensured by maintaining sufficient cash reserves and supplementing needs from the portfolio of Publicly listed liquid assets.

7. Investment risk management

Investment risks are diversified by allocating investments to different objects, different asset classes and regions, in accordance with the allocation objectives. The allocation takes into account the intercorrelations between the different asset classes, long-term prospective yield and the related uncertainty. The risks are further specified in Appendix 2.

8. Responsibility of investment activities

Investment activities take into account the responsibility of investment activities (Environmental, Social and Governance issues, ESG). In practice, the focus is on selecting asset managers who have a good reputation for monitoring responsibility and who are committed to compliance with responsibility standards. The Finance Board monitors the implementation of responsibility on a regular basis.

AYY monitors and promotes the United Nations Principles for Responsible Investment, UNPRI). This means that AYY and/or its asset managers

 take into account issues related to environmental responsibility, social responsibility and governance (ESG) in investment analyses and decision-making processes, in addition to economic analysis

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² Or the funds of the funds. For the sake of clarity, it is noted that investments are not made as direct object investments to shares or projects.

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- report on responsible investment activities and their progress
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- the related reporting promote the adoption of the principles of responsible investing in the investment sector and collaborating with other investors.

apply ESG issues in ownership practices and promote the responsibility of investments and

Combating climate change and other environmental crises requires not only responsible investing but also a conscious transfer of cash flows to low-carbon and ecological investments. Functioning ecosystems and abundant natural resources are critical factors in a functioning economy. Investments must have a guiding impact on combating environmental crises and managing global warming. The objective of the investment policy is that:

- AYY has no direct investments in fossil fuels (oil, natural gas, coal, peat)
- Wherever possible, AYY invests in impact objects, provided that these objects are considered to be included in the investment areas defined by AYY's investment policy. Impact investments aim to achieve significant environmental and social benefits in addition to return.

9. Investment instruments

The Student Union invests through funds. Money market investments can also be made in commercial bills, deposit certificates or fixed-term deposits. In exceptional cases, other direct portfolio investments may be made by the decision of the Finance Board. The reason for the deviation must be justified and in the interests of the Student Union. If direct equity investments are made (by AYY or through an asset manager), the existing market information and related party regulations should be considered.

- The Student Union invests in funds that invest in the following:
- Money market investments:
 - Short-term (term to maturity less than a year), euro-denominated debt securities with a good credit rating or classified as such, such as commercial bills, deposit certificates or fixed-term deposits.
- Bonds:
 - Euro-denominated Investment Grade bonds issued by governments or other public sector institutions or private companies, or funds investing in the aforementioned, or funds using equivalent investment products.
 - High Yield and Emerging Market Debt: Corporate loans with a lower credit rating than Investment Grade or bonds issued by emerging market governments and other public sector institutions.
- Equity investments:
 - Listed domestic, European, North American shares or listed shares of other emerging regions.
- Alternative investment strategies:
 - Equity investments (including various strategies such as buyout, growth, VC, etc.), hedge funds, commodities, infrastructure investments or other unlisted investments.
 - Funds of the funds are included in potential investment policy objects.
- 10. Limitations
 - Investment operations are limited mainly by allocation decisions. Allocation limits are presented in Allocation section.

158 159 160	To ensure adequate risk diversification, maximum allocation limits are defined for individual liquid assets. <i>The percentage</i> of the individual investment object of the <i>market value of the total investment portfolio</i> may not exceed the following levels:
161	Shares:
162 163	 Direct shareholding of an individual company max. 5% Individual equity fund max. 20%
164	Interest rate investments:
165 166	 Bank deposit max. 50% An individual issuer of a bond maturing within one year max 20%

- An issuer of a public-sector group bond max 20%
- An individual issuer of an Investment Grade bond max 5%
- An individual interest or money market fund max 20%

170 Alternative:

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- An individual fund investment of up to 5% of total student union portfolio value at the time of the investment
- If the value of the holding increases significantly during the investment period, the Finance Board will review whether it is appropriate risk management to try to get rid of the holding in question or limit other similar investments.

11. Asset monitoring, practical management and reporting

- Responsibility for monitoring lies with the Finance Board, which regularly reports to the Student Union Board.
- 179 The Student Union's Financial Director regularly reports to the Finance Board in cooperation with 180 asset managers and a reporting consultant. The Financial Director also monitors the general 181 investment situation outside the meetings of the Finance Board.

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- The Student Union may use external asset managers for asset management. Decisions on asset managers are made by the Finance Board. When selecting asset managers, the following should be taken into account:
- Asset managers must be reputable and solvent
 - Asset management mandates are put out to tender on a regular basis
- Asset management is decentralised to at least two asset managers
- Asset managers report to the Student Union on the status of the portfolio they manage.
- In addition, the Student Union may use expert companies to compile overall reporting. The purpose is to combine all asset management portfolios into a single student union portfolio to be reviewed as a whole. Such a reporting service is selected by the Finance Board.

193 2 Reporting

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- The purpose of reporting is to assess the success of investments for the Student Union.
- Asset managers produce monthly reports on assets they manage. In addition, a report covering the entire Student Union's investment assets is compiled from the asset managers' reports. These reports are submitted to the Finance Board.
- 198 Investment asset reporting consists of the following:
 - Market value of assets by asset class
 - Change in market value during the review period
 - Earnings by asset class over multiple review periods
 - Allocation at the point in time vs target allocation, and allocation history
 - Risk indicators

In addition, comparisons with benchmark indices for portfolio and asset class are compiled where applicable. The Finance Board decides the composition of the benchmark indices in such a way as to reflect the structure of the student union assets as well as possible. The benchmark index in force at the time of deciding on this investment policy is described in Appendix 3.

The Finance Board may also request other information from the reporters in relation to the portfolio. The total reporting also reports the assets under the management of the various asset managers, the returns achieved by them and the risks in the portfolio.

APPENDIX 1: Investment policy for the investment of cash assets of real estate companies

212 1. Cash assets

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The Student Union's majority-owned real estate companies have cash assets, the purpose of which is to finance future investments in real estate in accordance with regulations (such as ARA).

2. Objectives for investing cash assets and time horizon

The objective of investing the cash of real estate companies is to preserve capital and achieve a reasonable return in all market conditions. Target yield is a return equivalent to interest rates on money market instruments.

It is important to secure the preservation of capital and the opportunity to liquidate investments in a short period.

As a rule, the time horizon of investments is from six months to three years.

3. Investment instruments and risk management

The instruments of the money market fund definition of CESR (Committee of European Securities Regulators) and/or similar instruments in terms of their risk profile are used in the investing of cash assets of real estate companies.

Money market instruments must have an adequate short-term credit rating of at least A-2 (S&P) or P-2 (Moody's) given by a credit rating agency. In the absence of rating, the instrument is required to have an equivalent level assessed by the asset manager.

APPENDIX 2: MORE SPECIFIC INFORMATION ON INVESTMENT RISKS

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Investment risks are managed in accordance with the general principles of investment activities and portfolio theory.

- Stock market and interest rate market risk is limited through allocation limits.
- <u>Credit risk</u> arises mainly through interest rate investments. The majority of interest rate investments should be in Investment Grade interest rate investments or money market investments with a good credit rating. Interest rate investments with a lower credit rating have a maximum allocation limit and are invested only on a diversified basis through funds.
- <u>Currency risk</u> arises indirectly when investing in non-euro area securities. The operational risk
 associated with currency management is to be avoided by investing the majority of
 investments in euro-denominated investment products. As a rule, the currency risk included in
 fund investing is not hedged if the currency risk is part of the overall risk profile of the
 investment object.
- <u>Commodity market risk</u> may arise primarily through alternative investments This risk is limited by allocation limits.
- <u>Liquidity risk</u> is hedged at the level of the overall investment portfolio by keeping a sufficient proportion of assets in cash, short-interest instruments or funds for the operations of the Student Union (see section Allocation). In addition, other publicly listed asset classes (or funds investing in them) are also considered sufficiently liquid in terms of the Student Union's unexpected financial needs.
- <u>Counterparty risks</u> are diversified, firstly, by using several asset managers to manage the Student Union's assets. Counterparty risks associated with investments are mainly included in fund investments if the fund uses derivatives. Direct derivative investments are not made for the direct ownership of the Student Union.

In addition, the monitoring of responsibility matters aims to limit the risks associated with ESG matters in investment objects.

APPENDIX 3: Benchmark index

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A benchmark index basket determined by the Finance Board is used to assess the success of investments. The aim is to achieve the best possible comparability with the allocation of this investment policy (see the Allocation section).

Asset managers in asset management use the same benchmark index in their reporting.

The currently used benchmark index is as follows:

	Benchmark index	Index weight, %
Finland	OMX Helsinki Cap Index GI EUR	6
Europe	MSCI Daily Net TR Europe EUR	12
North America	MSCI Daily Net TR North America EUR	14
Japan, rest of the world	MSCI Japan (Daily TR EUR net)	4
Emerging market, share	MSCI Emerging Markets Daily Net TR	12
Money market	3-month euribor	6
Government bond	ICE BofA All Euro Gment index	8
Corporate bond IG	ICE BofA Euro Corporate TR EUR	10
High yield	ICE BofA BB-B Global High yield constr. (EUR hedged)	4
Emerging market, interest	ICE BofA Emerging Market external Debt sovereign Market index (EUR hedged)	4
Alternative	5% return	20

The Finance Board may decide on changes to the benchmark index basket if it improves comparability and the appropriateness of the index. Such situations include changes in the above indices or other perceived unsuitability with the comparability target. The index of publicly listed liquid assets can also be distinguished as its own benchmark.