



**OFFICE OF THE ILLINOIS STATE TREASURER
MICHAEL W. FRERICHS**

**Investment Policy Statement for the
Bright Start College Savings Program**

Effective October 29, 2025

State of Illinois
Office of the Treasurer
BRIGHT START COLLEGE SAVINGS PROGRAM
INVESTMENT POLICY STATEMENT
Effective: October 29, 2025



1.0 Statement of Purpose of Investment Policy

The purpose of this Investment Policy Statement (the “Policy”) is to assist contractors retained by the Office of the Illinois State Treasurer (the “Treasurer”) to provide services related to the management of the assets of the Illinois College Savings Pool (the “Pool”) that are contributed to the Bright Start College Savings Program (the “Program”) and to assist the Treasurer in evaluating the performance of such contractors by:

- Describing the Treasurer’s investment objectives;
- Providing general guidelines for the investment of assets of the Program;
- Describing the Treasurer’s long-term investment strategy;
- Describing the process of evaluating the performance of employees or contractors that provide investment management services to the Program;
- Describing the Treasurer’s objective to include sustainability factors within the investment decision process; and
- Specifying the responsibilities of any contractors that provide investment management services to the Program.

This is the official Policy of the Program. Deviation from this Policy is not permitted without prior, explicit, written permission from the Treasurer.

2.0 Establishment and Authority of Entity

The Program has been established as part of the Illinois College Savings Pool, and is intended to qualify as a qualified tuition program in accordance with Section 529 of the Internal Revenue Code of 1986, as amended. The Program was established to provide families with an opportunity to invest toward future higher education expenses.

3.0 Investment Philosophy

Bright Start offers high-quality and low-cost investment products that allow participants to construct a college savings strategy that aligns with their unique risk and return characteristics. The Treasurer has adopted a long-term total return strategy for the Program and its investments. To achieve the Program’s objectives, investments shall be diversified so as to minimize the risk of loss. While some asset classes may experience short-term and intermediate-term volatility, their long-term return assumptions justify

their inclusion. A long-term focus on investment results as well as prudent diversification across financial markets will be the primary risk control mechanisms.

In its investment strategy, the Treasurer relies on prevailing financial theory, which currently utilizes a long-term diversified asset allocation strategy. A prudently allocated investment program possesses a significant level of diversification, which produces risk reduction. In terms of impact, diversification shall be considered along the following lines: (1) asset classes (stocks, bonds, cash, real estate, etc.); (2) geography/country; (3) industry; (4) maturity; (5) credit quality; and (6) duration.

Contributions to the Program will be directed to one or more of the available Enrollment Year Portfolios, Static Allocation Portfolios, or Individual Portfolios (the “Portfolios”), each composed of a designated mix of investments or an individual investment fund. The determination of the investment parameters of each Portfolio shall be made by the Treasurer and shall take into account the financial characteristics of the investments in the Program. The investment parameters will also give due consideration to the fact that the investment horizon for participants will vary from a few months to over 18 years.

The Treasurer will review the investment performance of each Portfolio at least quarterly and shall review this Policy at least annually.

The holdings of the Program and the Portfolios may be divided into the following broad asset categories:

- A. Short-Term Investments and/or Cash and Cash Equivalents;
- B. Domestic Fixed Income Investments;
- C. International Fixed Income Investments;
- D. Real Estate Investments;
- E. Domestic Equity Investments; and
- F. International Equity Investments.

The Treasurer will establish reasonable guidelines for each Portfolio, specifying (as applicable) limits on asset and asset class exposures, risk constraints and investment return objectives. While the investment parameters offered under the Program are developed by the Treasurer, participants bear the risk of investment results. Individual participants who seek investments materially different from those offered may wish to select an investment alternative outside of the Program.

Section 30 of the State Treasurer Act (15 ILCS 505/30) declares that it is the policy of the Treasurer to promote and encourage the use of businesses owned by or under the control of qualified veterans of the armed forces of the United States, qualified service-disabled veterans, minority persons, women, or persons with a disability (“MWVD Persons”) and sets forth the aspirational goal of directing 25% of the total dollar amount of funds under management, purchases of investment securities, and other contracts to businesses owned by or under the control of MWVD Persons. As such, consistent with achieving the foremost investment objectives of the Treasurer set forth herein, the Treasurer will endeavor to identify and evaluate investment managers that are more than 50% owned and/or managed by MWVD Persons.

Pursuant to the Illinois Sustainable Investing Act (30 ILCS 238/1 et seq.), the Treasurer shall prudently integrate sustainability factors into its investment decision-making, investment analysis, portfolio

construction, risk management, due diligence, and investment ownership in order to maximize anticipated financial returns, minimize projected risks, and more effectively execute its fiduciary duties.

Sustainability analysis adds an additional layer of rigor to the fundamental analytical approach and can be used to evaluate past performance and to impact future decision-making. As a complement to traditional financial analysis, an accounting of sustainability factors provides a more complete view of risks and value prospects that may materially impact an investment fund or portfolio company's long-term value. Sustainability factors shall be integrated within a framework predicated on the following:

- A. **Materiality** – The Treasurer considers whether and to what extent a sustainability risk or opportunity exists that is reasonably likely to have a material impact on the financial condition or operating performance of a company, investment fund, or other investment vehicle.
- B. **Industry-Specific Information** – The Treasurer considers whether and to what extent the financially material sustainability risk or opportunity in question is relevant and applicable to individual industries.
- C. **Integration of Material Sustainability Factors** – The Treasurer prudently integrates material and relevant sustainability factors, including, but not limited to (1) corporate governance, financial incentives, and quality of leadership, (2) environmental factors, (3) social capital factors, (4) human capital, and (5) business model and innovation, as components of portfolio construction, investment decision-making, investment analysis and due diligence, prospective value proposition, risk management, and investment ownership in externally managed investment programs.
- D. **Active Ownership** – The Treasurer attentively oversees investment holdings to address sustainability risks and opportunities through the exercise of proxy voting rights and direct engagement with entities, such as investment funds, portfolio companies, government bodies, and other organizations.
- E. **Regular Evaluation of Sustainability Factors** – The Treasurer performs a recurring annual evaluation, at a minimum, of sustainability factors to ensure the factors are relevant to the evolving marketplace.
- F. **Additional Relevant and Financially Material Factors** – The Treasurer considers other relevant factors such as legal, regulatory, and reputational risks that contribute to an optimal risk management framework and are necessary to protect and create long-term investment value.

4.0 Investment Objectives

The overall investment line-up for the Program and, as applicable, the Portfolios provided to the participants, shall seek to achieve the following long-term investment objectives:

- A. A long-term competitive rate of return on investments that is equal to or exceeds a return of the applicable benchmarks shown in Section 7.0 hereof; and

- B. An investment program flexible enough to meet the needs of participants based upon their age or investment objective and that provides each participant with the ability to invest in a diversified portfolio to meet their investment goals.

5.0 Investment Responsibilities

The Treasurer is responsible for the investment policy statement, the direction of investments, and administration of the assets of the Program. In order to properly carry out its responsibilities, the Treasurer may rely on one or more contractors to assist in the administration of the Program. The Treasurer will engage and plan to rely heavily on said contractor (the “Manager”) for administrative services, as well as the contractor’s pertinent investment advisor, should they retain one, for investment management services. Among the current responsibilities of the Manager is the implementation of the investment strategy outlined in this Policy and the rebalancing of the Enrollment Year and Static Allocation Portfolios when market movement and/or cash flows cause an asset class to be outside its policy allocation bands. With the Treasurer’s approval, the Manager may retain an investment advisor to provide it with portfolio design, due diligence, and ongoing monitoring services with respect to the Portfolios and the implementation of the investment strategy outlined in this Policy. The Treasurer and the Manager shall meet quarterly to review portfolio performance as compared to the applicable benchmarks and peer group performance.

In managing the investments of the Program and the Portfolios, the Manager agrees that it will act with the skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of like character and with like objectives.

In addition, the Treasurer may engage an independent investment consultant for advisory services that will:

- Measure investment performance results, evaluate the investment program, and advise the Treasurer as to the performance and continuing appropriateness of each investment manager;
- Recommend modifications to the investment policies, objectives, guidelines, or management structure as appropriate; and
- Promptly inform the Treasurer regarding significant matters pertaining to the investment program.

6.0 Investment Parameters

Contributions will be invested in one or more of the available Portfolios, each composed of a designated mix of investments or an individual investment fund, which is appropriate for the age of the participant or the investment objective of the Portfolio. Each Portfolio may allocate assets among domestic equity, international equity, real estate, domestic fixed-income, international fixed-income, and/or short-term investments. The asset allocation of each Portfolio will be established by the Treasurer and managed by the Manager. The Treasurer may adjust the weighting in stocks, bonds, real estate, and cash in each Portfolio and may change the underlying investment funds within the Portfolios consistent with this Policy.

The Policy target asset allocations and benchmarks for the underlying investments within the Enrollment Year and Static Allocation Portfolios are shown in the following tables. There is a permissible range of plus or minus 5% of the target allocation for each underlying investment fund.

7.0 Plan Options

Passive Enrollment Year and Static Allocation Portfolios

Passive Enrollment Year Portfolios		Enrollment Year											
Aggressive		2042/2043	2040/2041	2038/2039	2036/2037	2034/2035	2032/2033	2030/2031	2028/2029	2026/2027	Enrolled		
Moderate*			2042/2043	2040/2041	2038/2039	2036/2037	2034/2035	2032/2033	2030/2031	2028/2029	2026/2027	Enrolled	
Static Allocation Portfolios		Equity					Balanced						Fixed Income
Asset Class	Benchmark**												
Domestic Equity	CRSP U.S. Total Market Index	58.0%	52.2%	46.4%	40.6%	34.8%	29.0%	23.2%	17.4%	11.6%	9.0%	7.0%	0.0%
Real Estate	MSCI US Investable Market Real Estate 25/50 Index	7.0%	6.3%	5.6%	4.9%	4.2%	3.5%	2.8%	2.1%	1.4%	1.0%	0.0%	0.0%
International Equity	MSCI EAFE Index	28.0%	25.2%	22.4%	19.6%	16.8%	14.0%	11.2%	8.4%	5.6%	4.0%	3.0%	0.0%
	FTSE Emerging Markets All Cap China A Inclusion Index	7.0%	6.3%	5.6%	4.9%	4.2%	3.5%	2.8%	2.1%	1.4%	1.0%	0.0%	0.0%
Domestic Fixed Income	ICE BofA US High Yield Index	0.0%	2.0%	4.0%	6.0%	8.0%	5.0%	6.0%	7.0%	8.0%	5.5%	4.5%	5.0%
	Bloomberg Barclays U.S. 1-5 Year Government / Credit Float Adjusted Index	0.0%	0.0%	0.0%	0.0%	0.0%	8.0%	11.0%	13.0%	16.0%	0.0%	0.0%	8.0%
	Bloomberg Barclays U.S. Aggregate Float Adjusted Index	0.0%	5.7%	12.0%	18.0%	25.0%	25.0%	26.0%	29.5%	32.0%	28.0%	20.0%	25.0%
	Bloomberg U.S. 0-5 Year Treasury Inflation Protected Securities Index	0.0%	0.0%	0.0%	0.0%	0.0%	5.0%	8.0%	10.0%	12.0%	13.25%	13.75%	5.0%
International Fixed Income	Bloomberg Barclays Global Aggregate ex-USD Float	0.0%	1.3%	2.6%	3.9%	4.0%	4.0%	6.0%	7.0%	8.0%	5.5%	4.5%	4.0%

	Adjusted RIC Capped Index												
	Bloomberg USD Emerging Markets Government RIC Capped Index	0.0%	1.0%	1.4%	2.1%	3.0%	3.0%	3.0%	3.5%	4.0%	2.75%	2.25%	3.0%
Cash and Cash Equivalents	3-month T-Bills	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	30.0%	45.0%	50.0%

* The Children Saving's Account program invested assets will automatically be invested into the Moderate Enrollment Year portfolios.

** Benchmarks are subject to change as mutually agreed by the Treasurer and Manager in order to ensure that they remain appropriate for each underlying investment and consistent with industry standards.

Active Blend Enrollment Year and Static Allocation Portfolios

Active Blend Enrollment Year Portfolios		Enrollment Year											
Aggressive		2042/2043	2040/2041	2038/2039	2036/2037	2034/2035	2032/2033	2030/2031	2028/2029	2026/2027	Enrolled		
Moderate		2042/2043	2040/2041	2038/2039	2036/2037	2034/2035	2032/2033	2030/2031	2028/2029	2026/2027	Enrolled	Enrolled	
Static Allocation Portfolios		Equity					Balanced						Fixed Income
Asset Class	Benchmark*												
Domestic Equity	S&P 500 Index	52.1%	47.0%	41.7%	36.6%	31.1%	26.5%	21.0%	15.4%	9.6%	6.7%	7.0%	0.0%
	Russell 2000 Value Index	2.9%	2.6%	2.3%	2.0%	1.7%	1.5%	1.2%	1.0%	1.0%	1.0%	0.0%	0.0%
	Russell 2500 Value Index	1.5%	1.3%	1.2%	1.0%	1.0%	1.0%	1.0%	1.0%	1.0%	1.0%	0.0%	0.0%
	Russell 2000 Index	1.5%	1.3%	1.2%	1.0%	1.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Real Estate	FTSE EPRA/NAREIT Developed Index	7.0%	6.3%	5.6%	4.9%	4.2%	3.5%	2.8%	2.1%	1.4%	1.0%	0.0%	0.0%
International Equity	MSCI EAFE Index	19.2%	17.3%	15.4%	13.4%	11.5%	9.6%	7.7%	5.6%	3.4%	3.2%	2.0%	0.0%
	MSCI ACWI ex-U.S. Index (net, unhedged)	6.0%	5.4%	4.8%	4.2%	3.6%	3.0%	2.4%	1.8%	1.2%	1.1%	1.0%	0.0%
	MSCI World ex-U.S. Small Cap Index	2.8%	2.5%	2.2%	2.0%	1.7%	1.4%	1.1%	1.0%	1.0%	0.0%	0.0%	0.0%
	MSCI Emerging Markets Index	7.0%	6.3%	5.6%	4.9%	4.2%	3.5%	2.8%	2.1%	1.4%	1.0%	0.0%	0.0%
Domestic Fixed Income	Bloomberg U.S. Corporate High Yield 2% Issuer Capped Index	0.0%	2.0%	4.0%	6.0%	8.0%	5.0%	6.0%	7.0%	8.0%	5.5%	4.5%	5.0%
	Bloomberg Barclays 1-3 Year U.S.	0.0%	0.0%	0.0%	0.0%	0.0%	8.0%	11.0%	13.0%	16.0%	0.0%	0.0%	8.00%

	Government / Credit Bond Index												
	Bloomberg Barclays U.S. Aggregate Bond Index	0.0%	4.7%	10.6%	15.9%	21.2%	21.0%	21.8%	24.6%	26.4%	24.15%	18.0%	21.0%
	Bloomberg U.S. 0-5 Year Treasury Inflation Protected Securities Index	0.0%	0.0%	0.0%	0.0%	0.0%	5.0%	8.0%	10.0%	12.0%	13.25%	13.75%	5.0%
	Morningstar LSTA Performing Loan Index	0.0%	1.0%	1.4%	2.1%	2.8%	3.5%	4.2%	4.9%	5.6%	3.85%	2.0%	3.5%
International Fixed Income	Bloomberg Global Aggregate Bond Index (USD Hedged)	0.0%	1.3%	2.6%	3.9%	5.2%	5.0%	6.0%	7.0%	8.0%	5.5%	4.5%	5.0%
	J.P. Morgan Emerging Market Bond Index Global Diversified	0.0%	1.0%	1.4%	2.1%	2.8%	2.5%	3.0%	3.5%	4.0%	2.75%	2.25%	2.5%
Cash and Cash Equivalents	3-month T-Bills	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	30.0%	45.0%	50.0%

*Benchmarks are subject to change as mutually agreed by the Treasurer and Manager in order to ensure that they remain appropriate for each underlying investment and consistent with industry standards.

Each underlying investment fund's return objective is to equal or exceed, over a five-year rolling period, the return of the applicable benchmark. Volatility, measured by the standard deviation of quarterly returns over that period, is expected to be similar to the benchmark. Each underlying investment is also expected to perform favorably relative to its peer group.

To the extent that the assets of a Portfolio are invested in one or more underlying investments approved by the Treasurer having investment objectives consistent with the above-noted asset allocation categories, the above-noted percentage guidelines shall be deemed satisfied. This shall be the case even if such an underlying investment's assets may not be entirely invested in the asset class in which such underlying investment has been placed.

Individual Fund Portfolios:

To provide additional diversity and flexibility to participants the Individual Fund Portfolios and corresponding, underlying investment funds will be described in the Program's current Program Disclosure Statement and may include the following asset classes:

Asset Class	Benchmark
Cash and Cash Equivalents	3 Month T-Bills U.S. Treasuries at 5 Year Constant Maturity
Short Term Fixed Income	Bloomberg Barclays 1-3 Year U.S. Government/Credit Bond Index
Core Bond	Bloomberg Barclays U.S. Aggregate Float Adjusted Index Bloomberg Barclays U.S. Aggregate Bond Index

Short Term U.S. TIPS	Bloomberg Barclays U.S. 0–5 Year Treasury Inflation Protected Securities Index
Global Bonds	Bloomberg Global Aggregate ex USD Float Adjusted RIC Capped Index
All Cap US Equity	CRSP U.S. Total Market Index
Large Cap Value	Russell 1000 Value
Large Cap Blend	S&P 500 Index
Large Cap Growth	Russell 1000 Growth
Small-Cap Value	Russell 2500 Value Russell 2000 Value
Small-Cap Growth	Russell 2500 Growth
All-Country Non-US	MSCI EAFE Index
Non-U.S. Small Cap	MSCI World ex-U.S. Small Cap Index
Real Estate	MSCI US Investable Market Real Estate 25/50 Index

8.0 Minority- and Woman-Owned Portfolios

The Program has included Woman- and Minority-Owned Portfolios for participants who would like to have a more diverse set of investment options as new viable options become available. The woman- and minority-owned underlying investment funds utilized in the program shall be screened on the following initial criteria: (1) firms with at least 51% woman and/or racial minority ownership or (2) funds that have a woman and/or racial minority investment manager that makes the portfolio management decisions (*i.e.*, a minority-owned subadvisor), and (3) funds that deliver above median returns over a 3-year and/or 5-year time period. The woman- and minority-owned options provided in the program shall include relatively high scoring female- and minority-owned investment managers representing a diverse set of asset classes.

Contributions will be invested in one or more of the available Portfolios, each composed of an individual investment fund, which is appropriate for the investment objective of the Portfolio. The Treasurer may change the underlying investment funds within specially designated portfolios, such as the woman- and minority-owned portfolios, consistent with this Policy.

The Treasurer may also add additional portfolios – for example, a veteran- or disabled-owned and/or managed portfolio – as new viable options become available.