FELRA and UFCW Pension Fund

Compliance Report

December 31, 2020

Investment Performance Services, LLC

Fixed Income Separate Account Quarterly Compliance Checklist
Period Ending December 31, 2020

To: Segall Bryant & Hamill

Re: FELRA & UFCW Pension Fund- Fixed IncomeUNKNOWN
B2F 9854 & B2F 9854T

As an authorized representative of the firm, I certify the following answers are accurate and attest that our firm has provided/attached all required explanations and/or supporting documents.

Part A: Account

1) Do you verify the portfolio and individual holdings are currently, and have been during the past quarter in compliance with the Fund's investment policy statement?

Yes **No (please explain)**

2) Please confirm you are in compliance with the Fund's investment policy statement by attaching the following:

a. Your quarter-end asset listing that includes market value percentages and bond ratings.
b. A comparison of the client's holdings at quarter-end to the permitted holdings as outlined in the Fund's investment policy statement.
c. Net and Gross returns QTR, YTD and 1YR.

See attached.

3) Have you reconciled securities, pricing, and accruals with the custodian?

Yes **No (please explain)**

4) With respect to the portfolio(s) under your management, do you acknowledge sole fiduciary responsibility under ERISA for adherence with the Fund's investment policy?

Yes **No (please explain)**

5) Do you see a need for a change in the Fund's current investment policy statement under which you are working?

No **Yes (please explain)**

6) In regard to derivative securities that may be held in the portfolio, do you attest that the following statements are true?

- The March 28, 1996, Letter of Guidance and Statement on Derivatives has been read and reviewed by personnel of this firm. We accept full responsibility for complying with all aspects of derivative investment outlined therein.
- Specific examples of types of derivatives include but are not limited to the following:
  - Structured Finance
  - Collateralized Debt Obligations (CDO)

    - Structured Commercial Mortgage Obligations
    - Collateralized Mortgage Obligations (CMO)
    - Collateralized Loan Obligations (CLO)
    - Structured Asset-Backed Obligations
- A complete list of derivatives securities utilized in the Fund's portfolio since our last certification is attached to this certification. In our judgment, these investments are prudent, in the best interest of the Fund and its participants and are in compliance with the investment policy and guidelines of the Fund.
- We certify that the subject derivatives are considered by this firm as suitable for the Fund given known actuarial and economic factors. In our analysis of the suitability of derivatives for the Fund, these positions have been stress tested under varying interest rate scenarios.
- Our firm has experienced personnel in place and the investment processes and the controls to prudently invest in the derivatives listed.

$\boxed{\text{Yes}}$ No (please explain)

7) Is the investment management fee charged by your firm to the Fund consistent with the fee schedule in the investment management contract? Is the fee charged by your firm to the Fund consistent with the fee charged by your firm to other funds of a similar size and the most competitive fee offered by your firm?

$\boxed{\text{Yes}}$ No (please explain)

We believe the fee for this client is competitive and appropriate based on the individual circumstances of this client relationship. As such, SBH may offer a different fee schedule to other clients based on their individual circumstances, which may include style, size, specific objectives, etc.

8) Have you confirmed that the Qualified Institutional Buyer requirements for the above client have been met for the purchases 144a securities?

$\boxed{\text{Yes}}$ No (please explain)

Part B: Firm

1) Have significant changes been made in the firm's investment management process during the quarter?

$\boxed{\text{No}}$ Yes (provide details)

2) Have any changes or departures occurred in the investment team or other key personnel within the firm during the past quarter?

$\boxed{\text{No}}$ Yes (provide details)

3) Have any ownership changes in the firm occurred during the quarter?

$\boxed{\text{No}}$ Yes (provide details)

4) Have there been significant changes to your Form ADV from the last copy delivered to the Fund? **<u>If you are not required to file form ADV, please explain why.</u>**

$\boxed{\text{No}}$ Yes (provide details)

5) Has your firm or any individual (employee) at the present or during the past quarter been named in litigation, a regulatory enforcement action, or investigation related to investment activities? Please include any updates on any pending litigation that has been previously reported.

$\boxed{\text{No}}$ Yes (provide details and current status)

6) Has your firm reviewed all regulations and directives from the Securities and Exchange Commission concerning brokerage and research services and are you in compliance with all disclosure requirements?

$\boxed{\text{Yes}}$ No (please explain)

7) Has your firm reviewed the DOL's final ruling on cross-trading of securities and are you in compliance with the ruling?

$\boxed{\text{Yes}}$ No (please explain)

8) Have any changes occurred in the Errors and Omission insurance coverage provided by your firm over the last quarter?

$\boxed{\text{No}}$ Yes (provide details)

9) Does the amount of insurance coverage meet or exceed the minimum amount required through your investment management contract with the Fund and the minimum amount required through the Fund's Investment Policy Statement?

$\boxed{\text{Yes}}$ No (please explain)

10) Is your firm adhering to the communication and reporting requirements as defined in the Fund's investment policy statement?

$\boxed{\text{Yes}}$ No (please explain)

11) Is your firm achieving best execution for the Fund on all transactions involving Fund assets?

$\boxed{\text{Yes}}$ No (please explain)

Subject only to a client's direction to use a particular broker or dealer for the execution of transactions for that client's account, SBH's overriding objective in selecting brokers and dealers to effect client transactions is to seek the best combination of net price and execution. The best net price, giving effect to brokerage commission, if any, is an important factor in this decision; however, a number of other judgmental factors also may enter into the decision. These factors include SBH's knowledge of negotiated commission rates currently available and other current transaction costs; the nature of the security being purchased or sold; the size of the transaction; the particular security; confidentiality; the execution, clearance and settlement capabilities of the broker or dealer selected and others considered; SBH's knowledge of the financial condition of the broker or dealer selected and such other brokers and dealers; and, SBH's knowledge of actual or apparent operational problems of any broker or dealer. Recognizing the value of these factors, SBH may cause a client to pay brokerage commission in excess of that which another broker might have charged for effecting the same transaction.

Certified for the Firm By:

Name: Paul Lythberg

Signature:

Title: Chief Compliance Officer/Chief Operating Officer

Firm: Segall Bryant & Hamill

Date: January 15, 2021

Report: Summary
Currency: Base Currency

Portfolio	20%G0QA80% B1AO	B E 1-3 YR G/C INDEX	B E INTERM G/C INDEX	B9F9854 *	B2F9854T.
Pricing Date	12/31/2020	12/31/2020	12/31/2020	12/31/2020	12/31/2020
Rep					
# Bonds	2,245	1,624	5,236	5	2
Base Currcy	USD	USD	USD	USD	USD
Cash (000)	0	0	0	1,820	316
Par (000)	8,001,427	4,411,941	11,683,522	1,820	321
Mkt Val (000)	1,000,000	4,571,257	12,483,876	1,820	316
Quality	Aa1	Aa1	Aa2	Aaa	Aaa
Mdys	Aa1	Aa1	Aa2	Aaa	Aaa
S&P	AA	AA	AA-	AAA	AAA
Coupon	2.018	1.866	2.225	0.08	0.079
Coupon (Mkt)	2.037	1.899	2.303	0.08	0.08
Curr Yield	1.957	1.812	2.098	0.08	0.08
Maturity (Yrs)	1.663	1.986	5.229	0.085	0.086
Avg Life	1.658	1.967	4.417	0.083	0.084
YTM	0.259	0.262	0.69	0.08	0.082
YTW	0.24	0.234	0.665	0.08	0.082
OAS	11	9	26	1	1
Mod Dur	1.632	1.948	4.178	0.083	0.084
Eff Dur	1.609	1.914	4.155	0.085	0.086
Conv	0.015	0.016	0.108	0	0
Spread Dur	0.482	0.632	2.126	0.085	0.086
				closed?	

Portfolio	20%G0QA80% B1AO	B E 1-3 YR G/C INDEX	B E INTERM G/C INDEX	B9F9854 *	B2F9854T.
Quality					
Aaa % Held (M	79.79	74.7	64.23	100	99.99
Aa % Held (M	3.05	3.33	3.27		
A % Held (MV	8.85	11.99	14.8		
Baa % Held (M	8.3	9.98	17.7		
Caa % Held (M					
C % Held (MV					
N/A % Held (M					0.01

Portfolio	20%G0QA80% B1AO	B E 1-3 YR G/C INDEX	B E INTERM G/C INDEX	B9F9854 *	B2F9854T.
Eff Dur					
<0.00 % Held					
0.00 - 0.99 %	22.42	1.34	0.4	100	99.99
1.00 - 1.99 %	43.89	55.53	19.37	0	
2.00 - 2.99 %	33.69	43.13	18.39		
3.00 - 3.99 %			14.7	0	
4.00 - 4.99 %			15.19		
5.00 - 5.99 %			9.54		
6.00 - 6.99 %			10.83		
7.00 - 7.99 %			5.37		
8.00 - 8.99 %			3.65		
9.00 - 9.99 %			2.57		
10.00+ % Held			0.01		0.01
Maturity (Yrs)					
<0.00 % Held					
0.00 - 0.99 %	20.01	0.02	0.02	100	99.99
1.00 - 1.99 %	41.78	50.63	3.36	0	
2.00 - 2.99 %	38.21	48.08	18.79		
3.00 - 3.99 %		1.26	16.52		
4.00 - 4.99 %			13.6	0	
5.00 - 6.99 %			22.75		
7.00 - 9.99 %			19.71		
10.00 - 14.99			5.24		
15.00 - 19.99					0.01
20.00 - 24.99					
25.00+ % Held					

Portfolio Code	Short Name	Report Heading1	Classification Member Name	End Valuation Date	End Market Value	Month To Date Net Additions	Month To Date Accrued Income	MTD Gross	MTD Net	QTD Gross	QTD Net	YTD Gross	YTD Net
50000183	B9F9854 *	FELRA & UFCW Pension Fund	Portfolio	12/31/2020	-316,081.87	-11,135,799.87	0	-0.19	-0.19	0.12	0.08	2.52	2.37

Portfolio Code	Short Name	Report Heading1	Classification Member Name	End Valuation Date	End Market Value	Month To Date Net Additions	Month To Date Accrued Income	MTD Gross	MTD Net	QTD Gross	QTD Net	YTD Gross	YTD Net
50000184	B2F9854T.	FELRA & UFCW Pension Fund	Portfolio	12/31/2020	316,300.57	0	0	170.22	170.22	170.42	170.35	181.23	180.96