

**CENTRAL WASHINGTON  
CATHOLIC FOUNDATION**

**INVESTMENT POLICY STATEMENT**

**Date Approved: March 28, 2003**

**Date Revised: June 30, 2009**

**Central Washington Catholic Foundation**  
**Investment Objective and Policy Guidelines**

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Table of Contents

I. Fund Description and Purpose.....	2
II. Parties Associated with the Central Washington Catholic Foundation.....	3
III. Investment Objectives .....	4
IV. Investment Goals .....	4-5
V. Investment Guidelines	
A. General Guidelines .....	6-7
B. Asset Mix Policy .....	7
C. Equity Investments .....	8
D. Fixed Income Investments.....	8
E. Short-term Investments .....	9
F. Prohibited Investments .....	9
VI. Investment Performance Review and Evaluation.....	10
VII. Policy Review Requirements .....	10
Appendix A – The Socially Responsible Investment Guidelines .....	11-24

## **I. Fund Description and Purpose**

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The Central Washington Catholic Foundation (hereinafter referred to as “the Foundation”) maintains accounts for various Funds. The Board of Trustees is charged with overseeing the investments.

The Foundation’s assets may be invested in publicly-traded equities, fixed income, and cash equivalents, and any other assets or funds specifically approved by the Board of Trustees. One or more outside Investment Managers selected by the Board of Trustees may manage the assets. The Investment Manager(s) will invest the assigned assets in accordance with the investment policy, objectives and guidelines stated herein.

This Statement outlines the objectives, goals and guidelines for the plan and is set forth:

1. To establish a clear understanding between the Board of Trustees and any Investment Manager(s) employed to manage the assets of the Foundation.
2. To provide guidance and limitations in the investment of Foundation assets.
3. To provide a meaningful basis for the evaluation of the portfolio management by the Investment Manager.

It is intended that these objectives, goals and guidelines provide meaningful guidance in the managed assets of the Foundation and not be overly restrictive given changing economic, business and investment market conditions.

This Statement will be reviewed on a periodic basis (at least annually) and any appropriate modifications will be made.

**II. Parties Associated with the Central Washington Catholic Foundation**

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Name of the Account:.....Central Washington Catholic Foundation  
Sponsor:.....Central Washington Catholic Foundation

IRS Tax Identification Number:..... EIN 33-1022610

Responsible Parties:.....Board of Trustees  
.....Central Washington Catholic Foundation  
  
..... Rev. Samuel P. Bellino, S.J.  
..... Executive Director

Legal Counsel:.....James M. Boutillier  
.....Pratt & Boutillier, PLLC  
..... 105 North Third Street  
.....Post Office Box 1425  
.....Yakima, WA 98907-1425

Investment Consultant:..... Blaine A. Carr  
..... Petersen Hastings Investment Management  
..... 8203 West Quinault, Suite 700  
.....Kennewick, WA 99336

Investment Manager(s):..... Schwab Institutional  
.....Division of Charles Schwab & Co., Inc.  
..... 101 Montgomery Street  
..... San Francisco, CA 94104  
  
..... Buckingham Asset Management  
.....BAM Advisor Services  
..... 8182 Maryland Avenue, Suite 900  
.....St. Louis, MO 63105

CPA: ..... Thomas Durrett, CPA  
.....Durrett & Associates, LLP  
.....The Tower, Suite 750  
..... 402 East Yakima Avenue  
..... Yakima, WA 98901

### **III. Investment Objectives**

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The managed assets of the Foundation may consist of stocks, fixed income and cash equivalent securities. The major investment objective varies depending upon the portfolio under management. Please note that the risk of each portfolio will vary. The 100% Fixed Income Portfolio will be the lowest risk. The Moderate Portfolio will have a higher risk than the Fixed, but lower than the Aggressive. The Growth Portfolio will be a higher risk than both the Fixed and the Moderate Portfolios.

### **IV. Investment Goals**

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#### 100% Fixed Income Portfolio

The principal investment objectives of the Fixed Income Portfolio are that it must generate a level of current income sufficient to meet withdrawal needs, and the asset growth, exclusive of contributions and withdrawals, should exceed the rate of inflation in order to preserve purchasing power of assets. The portfolio goal is to produce, after investment expenses, a minimum annual compound rate of return of 2.00% in excess of the rate of inflation as measured by the National Urban Consumer Price Index (CPI). This objective will be reviewed on a three year basis, at a minimum.

#### Moderate Portfolio

The principal investment objectives of the Moderate Portfolio are that the fund should, through a combination of investment income and capital appreciation, grow at a rate greater than the return on a balanced market index, while incurring less risk than such index. The asset growth, exclusive of contributions and withdrawals, should exceed the rate of inflation in order to preserve purchasing power of assets. It should also be recognized that short-term fluctuations in the capital markets may result in the loss of capital on occasion (i.e., negative rates of return). However, the asset value of the portfolio, exclusive of contributions to the plan, should be maintained and grow in the long-run. Proper diversification of assets must be monitored in order to assure preservation of the principal value of the fund and reduce portfolio risk for the fund. The fund should also generate a level of current income sufficient to meet withdrawal needs. The portfolio goal is to produce, after investment expenses, a minimum annual compound rate of return of 3.50% in excess of the rate of inflation as measured by the National Urban Consumer Price Index, (CPI). This objective will be reviewed on a three year basis, at a minimum.

#### Growth Portfolio

The principal investment objectives of the Growth portfolio are that through a combination of investment income and capital appreciation, the fund should grow at a rate greater than the return on a balanced market index, while incurring less risk than

such index. Also asset growth, exclusive of contributions and withdrawals, should exceed the rate of inflation in order to preserve purchasing power assets. It should also be recognized that short-term fluctuations in the capital markets (greater than the Moderate Portfolio) may result in the loss of capital on occasion (i.e., negative rates of return). However, the asset value of the fund, exclusive of contributions to the plan should be maintained and grown in the long-run. Proper diversification of assets must be monitored in order to assure preservation of the principal value of the fund. The portfolio goal is to produce, after investment expenses, a minimum annual compound rate of return of 3.90% in excess of the rate of inflation as measured by the National Urban Consumer Price Index (CPI). This objective will be reviewed on a three year basis, at a minimum.

### Growth Portfolio

The principal investment objectives of the Growth portfolio are that through a combination of investment income and capital appreciation, the fund should grow at a rate greater than the return on a balanced market index, while incurring less risk than such index. Also asset growth, exclusive of contributions and withdrawals, should exceed the rate of inflation in order to preserve purchasing power assets. It should also be recognized that short-term fluctuations in the capital markets (greater than the Moderate Portfolio) may result in the loss of capital on occasion (i.e., negative rates of return). However, the asset value of the fund, exclusive of contributions to the plan should be maintained and grown in the long-run. Proper diversification of assets must be monitored in order to assure preservation of the principal value of the fund. The portfolio goal is to produce, after investment expenses, a minimum annual compound rate of return of 3.90% in excess of the rate of inflation as measured by the National Urban Consumer Price Index (CPI). This objective will be reviewed on a three year basis, at a minimum.

With the exception of the Fixed Income Portfolio, each account is expected to meet or exceed the rate of return of a balanced market index comprised of the Standard and Poor's 500 Index, the Shearson Lehman Government Corporate Index, Russell 2000 Index, the Morgan Stanley EAFE Index and the 90 day U.S. Treasury Bill in similar proportion to the long-term average asset mix of the various portfolios. The Fixed Income Portfolio will be measured against the SLGC Index and the 90 Day U.S. Treasury Bill in similar proportion to the long-term average asset mix. It is expected that the accounts will provide an appropriate amount of liquidity for the current withdrawal liabilities of the Foundation.

## V. Investment Guidelines

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### A. General:

1. ERISA Standards. Although these accounts are not subject to ERISA requirements, it is expected that investments will be selected and managed in accordance with the fiduciary standards of ERISA, that is:
  - a) In the sole interest of the Foundation:
  - b) With the care, skill, prudence and diligence under the circumstances then prevailing that a prudent man acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and of like aims; and
  - c) By diversifying the investment so as to minimize risk of large losses.
2. Discretion. Subject to restrictions listed in sub-section B and C of this Section, and consistent with the Purpose and Investment Objectives of the Foundation, the Investment Manager(s) shall have the full discretion as to the asset mix between equities, fixed income and cash equivalents, and any other asset classes which have been specifically approved by the Board of Trustees, diversification among individual securities, economic and industry sectors, selection of individual securities and portfolio turnover.
3. Liquidity. The Board of Trustees will monitor the Foundation's cash flow on a regular basis, and sufficient liquidity shall be maintained to fund benefit payment outflows. When withdrawals become necessary, the Board of Trustees will notify the Investment Manager(s) as far in advance as possible to allow them sufficient time to build up necessary liquid reserves. The Investment Manager(s) will be expected to review the cash flow requirements with the Board of Trustees at least annually.
4. Volatility. Consistent with the desire for adequate diversification, Investment Policy for the Foundation is based on the assumption that the volatility of the portfolio will be similar to that of the market. Consequently, it is expected that the volatility of the total portfolio, in aggregate, will reasonably match that of a balanced market index weighed to match the actual asset mix of the Foundation.
5. Trading and Execution Guidelines. The Investment Manager(s) shall have the discretion to execute securities transactions with brokerage firms of their choosing; based upon the quality of execution rendered, the value of research information provided, the financial health and integrity

**B. Asset Mix:**

It shall be the policy of the Foundation to invest in assets in accordance with the maximum and minimum range for each asset category as described below:

100% Fixed Income Portfolio

Asset Category	Minimum	Maximum
Fixed Income and Cash Equivalents	100%	100%

Moderate Portfolio

Asset Category	Minimum	Maximum
Equities	30%	50%
Fixed Income and Cash Equivalents	50%	70%

Growth Portfolio

Asset Category	Minimum	Maximum
Equities	55%	75%
Fixed Income and Cash Equivalents	25%	45%

The asset-mix policy and acceptable minimum and maximum ranges established by the Board of Trustees represent a long-term view. As such rapid and significant market movements may cause the Foundation's actual asset mix to fall outside the policy range. Any such divergence should be of a short-term nature.

**C. Equity Investments:**

1. Types of Securities. Equity securities shall mean true *no-load* mutual funds or individual common stocks. (Note: *mutual funds* must meet ethical guidelines as described in section V, part A.
2. Diversification. The equity portfolio should be well diversified to avoid undue exposure to any single economic sector, industry group or individual security. The overall goal is to diversify the equity portion among the following stock classes that may include indexing to the S&P 500, the small capitalization market, value style stocks, growth style stocks, and international stocks.
3. Quality and Marketability. The equity portion of the portfolio will invest in selected mutual funds or individual common stocks. Such mutual funds or mutual fund managers must have at least a three-year performance history (manager performance with another fund or institution will be considered for performance history), no front-end sales charges, and no redemption fees. Any exceptions to the above must be approved by the Board of Trustees.

**D. Fixed Income Investments:**

1. Types of Securities. Fixed income securities shall mean marketable debt securities issued by either the United States Government, or agencies of the United States Government, domestic corporations, including industrials and utilities, insurance companies, and domestic banks and other United States financial institutions.
2. Quality. Only issues that are of investment grade, that is rated “BBB” or above by Moody’s or “Baa” and above by Standard & Poor’s, shall be purchased, except for issues held by no-load mutual funds which may not exceed a maximum non-investment grade holding of 5% of the total individual portfolio Foundation’s assets.
3. Concentration by Issuer. Investments in any one issuer (excluding obligations by the U. S. Government and Federal agencies fully guaranteed by the U. S. Government, mutual funds and collective trusts) or in any one issue shall not exceed 10% of the fixed income portfolio based on market value at time of purchase. Any exceptions to the above must be approved by the plan trustees.

**E. Short-term Investments:**

1. Types of Securities. Short term investments consist of fixed income securities maturing in one year or less at time of purchase. Issues include Certificates of Deposit, Commercial Paper, U. S. Treasury Bills, bankers acceptances, repurchase agreements and money market funds. Issues may be in the U. S. Government, or agencies of the United States Government, domestic corporations, including industrials and utilities, and domestic banks and other FDIC insured United States financial institutions.
2. Quality. Only fixed income securities that are rated investment quality shall be purchased. Commercial paper is to be at least Standard and Poor's rated "A-2" or Moody's "P-2". The underlying issuer of commercial paper is to have at least an "A" rating by the above noted rating services. Certificates of deposit, bankers acceptances, bank money market funds, and repurchase agreements are restricted to issuing banks with an "A" or higher rating.

**F. Prohibited Investments:**

Investments must comply with guidelines set forth in Appendix A. In addition, categories of investments, which are not eligible for investment without prior approval of the Board of Trustees, include:

- Short sales.
- Margin purchase or other use of lending or borrowing.
- Private placements.
- Commodities.
- Individual Foreign securities.
- Security loans.
- Unregistered or restricted stock.
- Warrants.
- Real Estate Mortgages.
- Real Estate Equity.
- Options or futures. (Except for covered calls)

## **VI. Investment Review and Evaluations**

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- A. Performance results for the Investment Manager(s) will be measured on a quarterly basis and presented to the Foundation's Finance Council at least annually. Performance will be calculated and compared on time-weighted rates of return, net of investment management fees.
- B. Consideration shall be given to the extent that the investment results are consistent with the investment objectives, goals and guidelines as set forth in this Statement.
- C. While the Board of Trustees intends to fairly evaluate the portfolio performance over the agreed period of evaluation, the Board of Trustees reserves the right to change Investment Manager(s) for any reason, including:
  - 1. The Foundation's performance is unsatisfactory to the Board of Trustees on either an absolute or relative basis and/or there is an unacceptable justification of poor results.
  - 2. Lack of responsiveness to the Board of Trustees' overall concern about the market or inflexibility of approach.
  - 3. Failure by the Investment Manager(s) to meet the Board of Trustee's communication and reporting requirements.
  - 4. Any failure to abide by the fiduciary standard of ERISA or failure to abide by the investment policies stated herein.

## **VII. Review of Investment Policy**

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The Board of Trustees will review this statement of Investment Policy or any part whenever circumstances change to the extent that the policy or any part thereof becomes ineffective or inappropriate.

# Appendix A

## Socially Responsible Investment Guidelines

Adopted at the November 1991 NCCB/USCC General Meeting  
and published in *ORIGINS* (a CNS Documentary Service)  
November 28, 1991, Vol. 21: No. 25

### Part I: Principles for NCCB/USCC Investments

#### Introduction

The National Conference of Catholic Bishops/U.S. Catholic Conference is called to exercise faithful, competent and socially responsible stewardship in how it manages its financial resources. As a Catholic organization, the Conference draws the values, directions and criteria which guide its financial choices from the Gospel, universal church teaching and Conference statements. In order to function effectively and to carry out its mission, the Conference depends on a reasonable return on its investments and is required to operate in a fiscally sound, responsible and accountable manner. The combination of religious mandate and fiscal responsibilities suggests the need for a clear and comprehensive set of policies to guide the Conference's investments and other activities related to corporate responsibility.

#### A. Background

The Catholic bishops of the United States have already addressed this need in a general way in the pastoral letter *Economic Justice for All*. The following excerpts from the pastoral letter emphasize three basic themes:

1. *Church as Shareholder and Investor*

"Individual Christians who are shareholders and those responsible within church institutions that own stocks in U.S. corporations must see to it that the invested funds are used responsibly. Although it is a moral and legal fiduciary responsibility of the trustees to ensure an adequate return on investment for the support of the work of the church, their

## 2. *Shareholder Responsibility*

"Most shareholders today exercise relatively little power in corporate governance. Although shareholders can and should vote on the selection of corporate directors and on investment questions and other policy matters, it appears that return on investment is the governing criterion in the relation between them and management. We do not believe that this is an adequate rationale for shareholder decisions. The question of how to relate the rights and responsibilities of shareholders to those of other people and communities affected by corporate decisions is complex and insufficiently understood. We therefore urge serious, long-term research and experimentation in this area. More effective ways of dealing with these questions are essential to enable firms to serve the common good." (*Economic Justice for All*, 306, *emphasis added*)

## 3. *Church as Economic Actor*

"Although all members of the Church are economic actors every day of their individual lives, they also play an economic role united together as Church. On the parish and diocesan level, through its agencies and institutions, the Church employs many people; it has investments; it has extensive properties for worship and mission. All the moral principles that govern the just operation of any economic endeavor apply to the Church and its agencies and institutions; indeed the Church should be exemplary." ("*Economic Justice for All*," 347, *emphasis added*)

Many dioceses and religious communities have been seeking to apply these directions through their own policies on corporate responsibility. At the national level, the Conference has some explicit and implicit policies contained in the bishops' statements on South Africa, the pastoral letters on peace, economics and racism, and statements on pro-life, family-life and other matters. The Committee on Budget and

## **B. Principles of Stewardship**

This current effort to fashion such guidelines is guided by two basic and interdependent principles on stewardship:

**Principle 1: The Conference should exercise responsible financial stewardship over its economic resources.** In practical fiscal terms, this means obtaining a reasonable rate of return on its investments. For example, the Conference now expects its managers to perform at least at the level of the market. In some areas the Conference has an actual fiduciary role (e.g., pensions). This requires caution in terms of risks taken with Conference resources.

**Principle 2: The Conference should exercise ethical and social stewardship in its investment policy.** Socially responsible investment involves investment strategies based on Catholic moral principles. These strategies are based on the moral demands posed by the virtues of prudence and justice. They recognize the reality that socially beneficial activities and socially undesirable or even immoral activities are often inextricably linked in the products produced and the policies followed by individual corporations. Given the realities of mergers, buyouts and conglomeration, which have accelerated in the past decade, it is increasingly likely that most investments will be in companies whose policies or products make the holding of their stock a "mixed investment" from a moral and social point of view. Nevertheless, by prudently applying traditional Catholic moral teaching, and employing such principles as are found in the Catholic reflection on cooperation and toleration, as well as the duty to avoid scandal, the ends proposed by Church moral and social teaching may be achieved in the area of investments, even when they are "mixed."

### C. Strategies

These two major principles work together to encourage the Conference to identify investment opportunities that meet both our financial needs and our social criteria. These principles are carried out through strategies that seek: 1) to avoid participation in harmful activities, 2) actively to pursue good, and 3) to use the Conference's role as stockholder for social stewardship.

Briefly, these three approaches may be described as follows:

1. *Do no harm (avoid evil)*: This strategy involves two possible courses of action: 1) refusal to invest in companies whose products and/or policies are counter to the values of Catholic moral teaching or statements adopted by the Conference of bishops; 2) divesting from such companies. The decision to divest, or to refuse to invest, would be based on the principle of cooperation and the avoidance of scandal. It would have to be done prudently, with care taken to minimize the financial impact and possible other negative consequences. In some cases, Conference policy may not absolutely require divestment, but significant Conference investments in these areas might cause confusion or scandal (e.g., heavy investment in conventional military weapons producers, gambling stocks, etc.). In these cases, prudence would be the guiding principle.
2. *Positive Strategy ("Do Good")* This strategy involves at least two possible courses of action: 1) seeking out and choosing to invest in companies which promote the values of Catholic moral and social teaching or positions advocated by Conference statements while earning a reasonable rate of return; 2) "alternative investments," i.e., investments which may result in a lower rate of return, but which nevertheless are chosen because they give expression to the Church's preferential option for the poor or produce some truly significant social good.

In the first case, the Conference can seek out companies and financial institutions which, in addition to their fiscal merits and investment advantages, have strong records in such areas as labor relations, affirmative action, affordable housing, (for example, market-rate certificates of deposit in institutions with special programs for low cost housing, or common stocks of companies that produce socially superior products and perform well in the market, etc.). In the second case, the Conference already has considerable positive experience with alternative investments through the Campaign for Human Development. This effort has become a permanent fixture of the Conference and will presumably continue. Given the purpose of the funds which the Conference holds, and, in some cases, its fiduciary responsibilities, opportunities for "alternative investments" with their

3. *Active Corporate Participation.* Given the teaching of *Economic Justice for All*, cited above, it seems appropriate for the Conference to adopt a strategy of active corporate participation with regard to all of its stock holdings. Under this approach the Conference will seek to exercise its normal shareholder responsibilities, especially casting informed votes on proxies and shareholders' resolutions in accord with Conference policies. It should be noted that failure to vote in such situations, or assigning proxies to management, is effectively counted as a vote for current management and the status quo. In the future the Conference should vote its proxies and use its opportunities as a shareholder to support policies in accord with its values and oppose those in conflict with them, within the limitations discussed below (cf. page 12).

This strategy involves actively using the Conference's position as shareholder to influence the corporate culture and to shape corporate policies and decisions. This strategy would include initiating or supporting shareholder resolutions, working with various religious and other groups who are working for corporate responsibility, writing letters to corporate executives and board members to advocate specific steps or to support or raise objections to a corporation's activities or policies.

This approach could also enable the Conference to deal effectively with the reality of "mixed investments." One way to be a socially responsible investor is to set threshold limits for corporations engaged in questionable or objectionable activities, to hold a minimal position in those companies that fall under the threshold, and then to use one's position as shareholder to work actively to influence or redirect the activities or policies of the corporation toward activities and policies which are socially beneficial and serve the common good. Investments of this type may be tolerated, after careful application of the principle of cooperation and the duty to avoid scandal, so long as the Conference engages in active participation and there is a reasonable hope of success for corporate change.

#### **D. Financial Impact**

One of the major concerns for the Committee on Budget and Finance's task force has been the potential impact of these kind of policies on the financial return of the Conference's investments. A variety of points of view on this

1. *The task force* met with several groups (Merrill Lynch Asset Management, the Calvert Group, and Christian Brothers Investment Services, among others) who have extensive experience in managing funds under these kind of policies. Each of them presented evidence that their restricted funds had performed better than or at the level of the market as a whole.
2. Our current investment advisor pointed out the current practice excluded a portion of the market (25.65% as of 12/31/90) and that, while it required more work, monitoring, and creativity, the firm had been able to live with these criteria without serious negative impact on the financial return.
3. Theoretically, a corporate responsibility program that precluded investment in a significant segment of the market would reduce the options available to the portfolio management and could negatively impact performance.
4. Since the market is so large, every investor selects some stocks and avoids others, using a variety of financial and other evaluative criteria. The addition of ethical criteria is an extension of this process. Some argue that further limiting investor options reduces flexibility, can distort market choices, and could negatively impact financial return. Others argue that the market is so large and varied that ethical criteria do not unduly inhibit investor choice, and there are ample options available to a capable and skilled investment advisor. They also argue that there are many well-run and profitable companies that practice corporate responsibility. In fact, they suggest that in today's environment of increased regulation and social concern, those companies with good records in these areas often perform better than their counterparts. For example, Merrill Lynch points out that investments in companies with direct investments in South Africa performed worse in the 1980's than the S&P 500. Likewise, manufacturers of birth control devices performed worse, as did major defense contractors.
5. All those we consulted pointed out that past performance does not guarantee future results. They also emphasized that ethical criteria add a new dimension to investing decisions which requires some additional skill and creativity on the part of investment managers.

## E. Conference Directions

In carrying out these strategies the Conference will be required to strengthen its capacity in several areas:

1. *Corporate Awareness:* The Conference will have to build on its current efforts and monitor more closely how Catholic teaching and Conference policy are advanced and undermined in the marketplace and by corporate actions. It will need to make use of the growing resources that regularly monitor corporate responsibility issues and stay in touch with networks of others who share similar concerns. In addition, the Conference ought to subscribe to the publications of groups that offer research, advice, and assistance in the area of corporate responsibility.
2. *Investment Guidance:* The Conference will have to work closely with its investment advisors, at least initially, to articulate clearly its goals and policies in this area and assist them in carrying them out. A tool that has proven useful for others is a set of instructions for voting proxies on issues of concern to the client. Obviously, the Conference needs investment advisors who have shown themselves to be sympathetic, skillful and successful in carrying out an effective investment program within these kinds of constraints.
3. *Prudence/Common Sense:* Our work with investment advisors and others interested in corporate responsibility will require both prudence and common sense in carrying out these policies. The basic direction is set by Conference policies. The strategies employed and their timing and pace will depend on the considered judgments of the committee, staff and advisors.
4. *Limitations:* We seek to implement these guidelines without new investments in staff. In carrying them out, they may need to be phased in over time. It may also be necessary to focus our efforts on a few areas at a time rather than trying to implement in a sweeping way a comprehensive set of policies. Clearly, this task will require additional attention from the Committee on Budget and Finance and its related staff, as well as other Conference staff with expertise in related areas (e.g., Doctrine, Pro-Life, Social Development and World Peace, etc.).

## **F. Summary**

In seeking to carry out these principles and directions, the Conference has both limitations and opportunities. Its corporate responsibility policies need to reflect both the financial and fiduciary responsibilities of the Conference, and the mandate to apply our traditional social teaching in the world of investments. The Conference cannot preach to others what it does not practice itself. The Committee on Budget and Finance seeks to pursue these policies in good faith, recognizing the limitations as well as other staff and committee commitments. The Committee seeks to pursue these policies not in any spirit of confrontation or conflict, but in a sincere desire to work for a more just society and more peaceful world through the careful stewardship of the limited resources of the Conference. In this modest, but hopefully useful effort, the Committee on Budget and Finance seeks both to protect the financial resources of the Conference and to exercise its responsibilities as an investor to advance in a small way the values of the faith. While recognizing the complexity and challenge of this exercise of faithful stewardship, the Committee is convinced that the Conference cannot fulfill its responsibilities without a clear commitment to socially responsible investing.