



INVESTMENT POLICY STATEMENT

Policy Number: 0021

Effective Date: 07/2025

Review Date: 07/2026

PURPOSE AND OBJECTIVES

Statement of Purpose

This Investment Policy Statement (“*IPS*”) provides the framework for the management and oversight of the endowment assets of Natrona Collective Health Trust (the “*Trust*”) (formerly named Wyoming Medical Center Foundation) Endowment (the “*Endowment*”). The Endowment consists of such assets deemed by the Board of Trustees of the Trust (the “*Board*”) to be assets of the Endowment. The Finance Committee (the “*Committee*”), a subcommittee of the Board, will be responsible for supervising and monitoring the Endowment in accordance with the guidelines outlined in the *IPS*. The objectives, policies and guidelines set forth in the *IPS* are intended to promote reasonable risk control parameters to ensure prudence and care in the execution of the investment program of the Endowment.

Objective of the Endowment

The Endowment provides financial support to the long-term mission of the Trust. Accordingly, the primary objective of the Endowment is to maintain intergenerational equity – the principle that equity should be preserved across generations of beneficiaries. Therefore, the performance of the Endowment must at least keep pace with its spending rate plus inflation over the long term in order to maintain the purchasing power of the Endowment in perpetuity. This will be accomplished through a carefully planned and executed long-term investment program.

Performance Goals

On an annualized, net of fees basis, the return on the total portfolio over the long term (or a measurable market cycle) will be expected to:

- Equal or exceed the spending rate (5.0%) plus inflation (CPI) over a market cycle.
- Equal or exceed the average long-term return of appropriate capital market indices weighted by the asset allocation target percentages (*see Policy Benchmark definition below*)

Performance goals are based upon a long-term investment horizon, therefore interim fluctuations should be viewed with appropriate perspective.



INVESTMENT PHILOSOPHY AND ASSET ALLOCATION

Investment Philosophy

The Endowment has a long-term, perpetual investment horizon, and allocates its assets accordingly. It is recognized that a strategic long-term asset allocation plan implemented in a consistent and disciplined manner is critical to the Endowment’s long-term investment performance.

While the Endowment seeks to preserve intergenerational equity, it also recognizes the principle that varying degrees of investment risk are generally rewarded with compensating returns.

Asset Allocation Targets and Ranges

The Endowment’s asset allocation policy targets and policy ranges are as follows:

Asset Class	Range MIN	Target	Range MAX	Benchmark
GROWTH	50%	60%	70%	MSCI All-Country World Index (ACWI)
Global Equity	20%	45%	70%	MSCI All-Country World Index (ACWI)
Private Capital*	0%	15%	25%	MSCI All-Country World Index (ACWI)
DIVERSIFYING	0%	28%	40%	Weighted Diversifying Composite²
Cash	0%	0%	5%	ICE BofA ML 3-Month U.S. T-Bill Index
U.S. Treasuries	0%	3%	10%	Bloomberg Barclays US Treasury 5-10 Year Index
Core Bonds	0%	11%	20%	Bloomberg Barclays U.S. Aggregate Bond Index
Credit	0%	3%	10%	ICE BofA ML High Yield Master II
Private Credit*	0%	4%	10%	ICE BofA ML High Yield Master II
Diversifying Strategies	0%	7%	15%	HFRI FOF Conservative
INFLATION HEDGING	0%	12%	25%	Weighted Inflation Hedging Composite³
Public Natural Resources	0%	2%	5%	S&P Global Lrg./MidCap Commodity and Resources
Private Real Estate*	0%	6%	10%	NCREIF ODCE (Lagged)
REITs	0%	2%	5%	FTSE NAREIT All Equity REITs Index
Core Real Estate	0%	2%	10%	NCREIF ODCE (Lagged)
Asset Class Total		100%		



***Illiquid Investments**

Definition: Investments that do not provide the opportunity for redemption requests at least annually. Typically, Illiquid Investments are expected to have an investment period of multiple years, sometimes exceeding 10 years.

Objective: As compensation for giving up liquidity, Illiquid Investments are expected to generate a return premium above their public market equivalents. These investments are intended to serve as a driver of long-term capital appreciation.

Target

Allocation: The Endowment's target allocation to Illiquid Investments is 25 percent of the Endowment's market value. Because committed capital is typically called over time, and distributions generally begin before all capital is called, it is expected that the total amount committed to Illiquid Investments may be higher than 25 percent of the Endowment's market value.

Investment

Process: Developing a mature, diversified portfolio of Illiquid Investments requires consistent, periodic investment commitments to such investments over a long-term time horizon. Once a mature portfolio of Illiquid Investments has been developed, sustaining it will require additional commitments to new opportunities in order to maintain the Endowment's exposure to such investments as capital is returned via distributions.

Review: On an annual basis, the Investment Advisor (as defined below) will inform the Finance Committee of anticipated commitments to Illiquid Investments. In addition, the Investment Advisor will review the size and pace of future commitments to Illiquid Investments to ensure compliance with the allocation specified in the IPS.

Benchmarks

Inflation Benchmark: CPI + 5.0% annualized

The Inflation Benchmark serves as a long-term reference target for the Endowment to maintain its real value, net of spending and inflation. Over shorter periods of time, the Endowment's return may deviate substantially from this benchmark.

Policy Benchmark: 60% MSCI All-Country World Index (ACWI)
28% Weighted Diversifying Composite
12% Weighted Inflation Hedging Composite

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The Policy Benchmark is a diversified benchmark that reflects the broad underlying exposures of the Endowment.

Weighted Diversifying Composite:

- 11% Bloomberg Barclays US Treasury 5-10 Year Index
- 39% Bloomberg Barclays U.S. Aggregate Bond Index
- 25% ICE BofA ML High Yield Master II
- 25% HFRI FOF Conservative

Weighted Inflation Hedging Composite:

- 66% NCREIF ODCE (Lagged)
- 17% FTSE NAREIT All Equity REITs Index
- 17% S&P Global Large MidCap Commodity and Resources Index

SPENDING & REBALANCING POLICIES

Spending Policy

Since the purpose of the Endowment is to support the long-term mission of the Trust, a designated portion of the Endowment will be distributed in support of that mission each year.

The Trust's spending policy is based on a weighted average spending methodology. The weighted average formula increases last year's spending amount by a weighted combination of two factors: inflation and a percentage of the Endowment market value. The calculation of the weighted average spending method is summarized below:

80% weighted to inflation factor (CPI, or the Consumer Price Index)

- The previous year's total spending amount is increased by the inflation factor and then weighted by 80 percent
- September CPI-U for the current year is used for budgeting purposes

20% weighted to endowment market value (5.25% of one-year Endowment market value)

- 5.25% percent of the Endowment market value is calculated and then weighted by 20 percent
- .25% of the spend is calculated for those expenses that are not considered charitable and do not count towards the 5.0% distribution requirement

When considering spending plans and distributions from the Endowment, the Board will exercise good faith and prudence. The Board will consider factors that include tax implications, the duration and preservation of the Endowment, general economic conditions, the effect of

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inflation or deflation, the expected total return of investments, and any other resources available to the Trust.

Pursuant to applicable contractual arrangement, Natrona Collective Health Trust (formerly named Wyoming Medical Center Foundation) is required annually to distribute 3.33% of the Foundation Net Assets (as defined in the Support Agreement between WMC Foundation (dba Natrona Collective Health Trust) and WMC dated October 1, 2020) to WMC; such distributions to WMC will count against the satisfaction of the 5% requirement under federal income tax laws. Investment liquidity is required to support the Foundation objective as well as maintain the portfolio via rebalancing and fund illiquid investments. Therefore, asset liquidity must be considered in any investment strategy.

Rebalancing Policy

The purpose of rebalancing the Endowment is to control portfolio risk and maintain the asset allocation within the policy ranges. Portfolio allocations will be monitored regularly and rebalanced as needed, and in a cost-effective manner, to remain in compliance with the IPS.

Tactical rebalancing, which represents opportunistic portfolio positioning away from the policy targets, is also permissible as long as these positioning changes do not violate the stated policy ranges for each asset class.

ROLES & RESPONSIBILITIES

Duties of the Board

- Approve the IPS as developed and any subsequent revisions to the IPS
- The Board has authorized the Finance Committee to act on its behalf in executing the IPS

Duties of the Finance Committee

The Finance Committee is responsible for monitoring the portfolio asset allocation and evaluating its performance with respect to the objectives and guidelines laid out in the IPS.

The Finance Committee will implement the investment program within the constraints of the IPS through the use of a qualified external professional ("**Investment Advisor**").

The above agreement notwithstanding, the specific responsibilities of the Finance Committee include:

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- Establish key inputs into strategic policy, including, but not limited to:
 - Return objective of the Endowment
 - Risk profile of the Endowment
 - Illiquidity budget of the Endowment
 - Strategic asset allocation targets and ranges of the Endowment
- Supervise the overall implementation of the IPS
- Monitor and evaluate the investment performance of the Endowment
- Report regularly on investment matters to the Board
- Grant exceptions as permitted in the IPS and recommend changes to the IPS as needed
- Periodically review and make recommendations to the Board regarding the spending policy of the Endowment
- Receive, review and retain the reports of the Investment Advisor
- Appoint, evaluate and remove the Investment Advisor of the Endowment
- Negotiate compensation arrangements with all service providers; control and account for all investment expenses
- Execute such other duties as may be delegated by the Board

Duties of Management and its Staff

In the management of the Trust's assets, Management and its Staff ("**Management**") will:

- Execute any documents necessary to facilitate the implementation of the IPS, including but not limited to contracts and subscription documents
- Provide overall monitoring of the Investment Advisor, ensuring they conform to the terms of their contract(s) and that performance monitoring systems are sufficient to provide Management with timely, accurate and useful information

Duties of the Investment Advisor

Governed by an Investment Management Agreement between the Trust and the Investment Advisor, the Investment Advisor will have full discretion and authority to manage the assets of the Endowment in a manner consistent with the IPS.

- Consult and assist the Finance Committee in the development of key strategic policy decisions
- Review the IPS and key strategic policy decisions on a periodic basis, which in most cases should involve review at least once every calendar year
- Manage the assets of the Endowment in a manner consistent with the objectives, guidelines, and restrictions within the IPS
- Select, retain, and terminate sub-advisors as necessary to execute specific investment strategies
- Rebalance the Endowment based on the Rebalancing Policy within the IPS
- Monitor the Endowment's investment performance and investment risks

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- Report to Management and the Finance Committee on a regular basis
 - Reports will include market value, investment performance, asset allocation, and other pertinent information related to the Endowment's assets

INVESTMENT GUIDELINES

Growth

The purpose of public equity investments, both domestic and international, is to provide capital appreciation, and current income, with the recognition that this asset class carries with it the assumption of greater market volatility and greater risk of loss than some of the other asset classes. This component includes domestic and international common stocks, American Depository Receipts (ADR's), preferred stocks, and convertible stocks traded on the world's stock exchanges or over-the-counter markets.

Public equity securities shall generally be restricted to high quality, readily marketable securities of corporations that are traded on the major stock exchanges, including NASDAQ. Equity holdings must generally represent companies meeting a minimum market capitalization requirement of \$50 million with reasonable market liquidity. Decisions as to individual security selection, number of industries and holdings, current income levels and turnover are left to broad manager discretion, subject to the standards of fiduciary prudence. However, no single major industry shall represent more than 20% of the Endowment's total market value, and no single security shall represent more than 5% of the Endowment's total market.

Within the above guidelines and restrictions, the Manager(s) has complete discretion over the timing and selection of equity securities.

Equity investments may also include Private Equity and Venture Capital, together referred to as Private Capital. These investments are typically made through limited partnerships or limited liability corporations offered by professional investment managers. Private Capital strategies may include private equity, venture capital and distressed investments. These strategies typically offer no or limited ability to redeem or withdraw.

Diversifying

The purpose of fixed income investments, both domestic and international, is to provide diversification, a predictable and dependent source of current income, as well as a source of downside and/or deflation hedging. It is expected that fixed income investments will not be totally dedicated to the long-term bond market but will be flexibly allocated among maturities of

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different lengths. Core fixed income instruments should reduce the overall volatility of the Endowment's assets and provide a deflation hedge.

Fixed income investments within the Endowment include, but are not limited to, U.S. Treasury and government agency bonds, foreign government and supranational debt, public and private corporate debt, liquid and illiquid credit, mortgages and asset-backed securities, and non-investment grade debt. Fixed income also includes money market instruments, including, but not limited to, commercial paper, certificates of deposit, time deposits, bankers' acceptances, repurchase agreements, and U.S. Treasury and agency obligations.

Yield-oriented investments may include securities that are rated below Investment Grade. These securities may include high yield bonds, business development companies, leveraged loans, and direct loans, in both public and private structures.

Investments in fixed income securities should be managed actively to pursue opportunities presented by changes in interest rates, credit ratings, and maturity premiums. However, index funds may also be used if appropriate for implementing the policy.

Investments of a single issuer, with the exception of the U.S. Government and its agencies (including GNMA, FNMA and FHLMC), may not exceed 5% of the total market value of the Endowment.

Within the above guidelines and restrictions, the Manager(s) has complete discretion over the timing and selection of fixed income securities.

Diversifying Strategies includes hedge fund investments that are intended to provide diversification to the Endowment through low correlations to broad equity and fixed income markets. In addition, the strategies should collectively generate alpha (outperformance relative to its benchmark after accounting for risk) and therefore generate attractive risk-adjusted performance.

These strategies may include hedged equity, credit, event-driven, relative value, global macro, trend-following, quantitative, and other hedged strategies. Hedge fund managers may use leverage and derivatives to implement their strategies.

Cash and Equivalents

Cash investments may include high quality commercial paper, repurchase agreements, Treasury Bills, certificates of deposit, and money market funds to provide income, liquidity for expense

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payments, and preservation of the Endowment's principal value. Commercial paper assets must be rated at least A1 or P-1 (by Moody's or S&P).

No more than 5% of the Endowment's total market value may be invested in the obligations of a single issuer, with the exception of the U.S. Government and its agencies.

Uninvested cash reserves shall be kept to a minimum; short term, cash equivalent securities are usually not considered an appropriate investment vehicle for investment. However, such vehicles are appropriate as depository for income distributions from longer term investments, or as needed for temporary placement of funds directed for future investment to the longer-term capital markets.

Within the above guidelines and restrictions, the Manager(s) has complete discretion over the timing and selection of cash equivalent securities.

Inflation Hedging

The purpose of investment strategies within this investment category is to primarily to hedge the Endowment against inflation and to provide diversification to other investment strategies in the Endowment. Some investments may also provide long-term opportunities for capital growth or income. Investments may include U.S. Treasury inflation-indexed securities ("TIPS") and non-U.S. dollar denominated inflation-indexed securities, commodities (e.g. agricultural goods, metals, minerals, energy products, and foreign currencies), natural resources (e.g. oil, gas, clean energy, services, timber, and other natural resource investments), real estate (e.g. REITS, core, value-add, and other opportunistic real estate investment strategies) and other strategies (e.g. infrastructure, intellectual property, or royalty payments). Investments may include both public and private structures.

Other Guidelines

Derivatives and Derivative Securities

Investment managers may be permitted to use derivative instruments under the terms of their specific investment guidelines. Derivatives are contracts or securities whose market value is related to the value of another security, index, or financial instrument. Investments in derivatives include (but are not limited to) futures, forwards, options, options on futures, warrants, and interest-only and principal-only strips. No derivative positions can be established that create portfolio characteristics outside of portfolio guidelines. Examples of appropriate applications of derivative strategies include hedging market, interest rate, or currency risk, maintaining exposure to a desired asset class while making asset allocation changes, gaining exposure to an asset class when it is more cost-effective than the cash markets, and adjusting duration within a fixed income portfolio. Derivatives positions should be fully collateralized. Investment managers must

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ascertain and carefully monitor the creditworthiness of any third parties involved in derivative transactions.

Each manager using derivatives shall (1) exhibit expertise and experience in utilizing such products; (2) demonstrate that such usage is strategically integral to their security selection, risk management, or investment processes; and (3) demonstrate acceptable internal controls regarding these investments.

RESTRICTIONS

The Finance Committee is authorized to waive or modify any of the restrictions in these guidelines in appropriate circumstances. Any such waiver or modification will be made only after a thorough review of the manager and the investment strategy involved.

For mutual and other commingled funds, the prospectus or Declaration of Trust documents of the fund(s) will govern the investment policies of the fund investments. While the Finance Committee understands that such funds have their own stated guidelines which cannot be changed for individual investors, in principle and spirit those guidelines should be similar in nature to the guidelines stated above. To the extent that a fund allows any or all of the above stated restrictions, the Finance Committee must be aware of their possible use and be confident that the Investment Advisor thoroughly understands the risks being taken, has demonstrated expertise in their usage of such securities, and has guidelines in place for the use and monitoring of those securities.

SPECIFIC FOUNDATION REQUIREMENTS AND CONSTRAINTS IMPACTING INVESTMENTS

County Conveyance Principal – The Investment Policy Statement (“IPS”) applies to all invested assets of the Foundation including the Conveyance Principal of \$40,000,000 defined and established in the Foundation-County Agreement between the Foundation and Natrona County dated October 1, 2020. Separate accounting principles will be applied to these assets to segregate investment gains and losses and a monthly portfolio return calculated using modified Dietz method will be applied to the balance to account for changes in asset market value. WMC Foundation staff and the Finance Committee will work with the Foundation’s Investment Advisor, if and as requested, to prepare semi-annual and annual reports to the County regarding the investment performance of the Conveyance Principal, as required pursuant to the Foundation-County Agreement. The County Conveyance Principal is not to be distributed, except to the extent set forth in the Foundation-County Agreement and expressly authorized by the Foundation Board of Directors.

Contractually-Required Distributions – Per the Support Agreement between WMC Foundation (dba Natrona Collective Health Trust) and Wyoming Medical Center, WMC Foundation (dba

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Natrona Collective Health Trust) is required to annually distribute to Wyoming Medical Center 3.33% of WMC Foundation (dba Natrona Collective Health Trust) Net Assets (as defined in the Support Agreement). The distribution is calculated using December 31st values and is to be paid by June 30 of the next year unless deferred by the Foundation as provided in the Support Agreement. WMC Foundation (dba Natrona Collective Health Trust) staff and the Finance Committee will work with the Foundation's Investment Advisor and Investment Management Firms, if and as requested, to calculate the annual dollar amount of the annual Foundation contribution to Wyoming Medical Center and to evaluate timing for payment of the same, including identification of specific Fund assets to be liquidated accordingly.

Required Distributions Per Federal Income Tax Laws – As a private foundation under federal income tax laws, WMC Foundation (dba Natrona Collective Health Trust) is required to annually expend, either for the direct conduct of charitable activities or via distributions to qualified recipients, an aggregate amount of 5% of the fair market value of its net investment assets. WMC Foundation (dba Natrona Collective Health Trust) staff and the Finance Committee will work with the Foundation's Investment Advisor, if and as requested, to determine the fair market value of Fund assets as necessary to determine the Foundation's annual minimum distribution requirement under the foregoing federal income tax laws. The annual Foundation Contribution to Wyoming Medical Center will count against the minimum distribution requirement under federal tax laws.

Legacy Foundation Assets – The asset value of WMC Foundation (dba Natrona Collective Health Trust) (~\$8.066 MM) immediately prior to the affiliation of Wyoming Medical Center with Banner Health as of October 1, 2020 is included in the Foundation's net investment assets for purposes of the 5% minimum distribution requirement under federal income tax laws. However, these legacy Foundation assets are not included in the calculation of Foundation Net Assets subject to the annual 3.33% distribution requirement to Wyoming Medical Center.

Taxes – As a private foundation, WMC Foundation (dba Natrona Collective Health Trust) is subject to an annual 1.39% federal tax on its net investment income. The imposition and payment of this tax will be considered in connection with the implementation of this IPS.

Expenses – The Fund's investment management fees will be tracked and reported in the quarterly performance report. Additionally, the Finance Committee will seek to prudently optimize expenses involved with managing the investment portfolio.

Unrelated Business Income (UBI) – Implementation of the investment strategy may include the use of private investments, particularly with alternative asset classes. Investors in these asset classes are often structured as Limited Partners (LP) and receive K-1s as opposed to 1099s. As a non-profit tax-exempt entity, WMC Foundation (dba Natrona Collective Health Trust) should consider the possibility of Unrelated Business Income (UBI) that may be a factor with these

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investments, and the potential for additional cost (Tax and Administrative Fees) when deciding to implement such a strategy.

Key Reviewer/Owner: CFO and Finance & Audit Committee