

UVIMCO DISCLOSURE POLICY

Overview

This Disclosure Policy has been adopted by the University of Virginia Investment Management Company (“UVIMCO”), which provides investment management services to the University of Virginia and related Foundations. UVIMCO acknowledges its responsibility as the investment office for a public University to be open and accountable to its investors and the public. UVIMCO is committed to the full and fair disclosure of factual information that outsiders may need to understand our investment objectives and performance.

Scope

This disclosure policy applies to all employees, officers, and directors of the company and addresses both oral and written communications with existing and potential investors, the media and the public.

Publicly Available Information

UVIMCO releases monthly reports on investment performance and quarterly investment commentary to existing investors and the public. These documents, as well as UVIMCO’s Investment Policy Statement, Policy Portfolio and information about the company’s corporate governance are available at www.virginia.edu/uvimco, the company’s website.

Confidential Information

Unless required by law, UVIMCO does not disclose any information about external investment managers or any other information that may:

- Conflict with confidentiality provisions or other representations included in binding legal agreements with external investment managers or other parties;
- Invite others to copy UVIMCO’s investment strategies; or
- Reduce UVIMCO’s access to top investment managers.

UVIMCO may provide depositor organizations access to confidential information maintained on UVIMCO’s premises.

Authorized Spokespersons

The designated company contacts for UVIMCO are the Assistant Vice President for Public Affairs in the Office of University Relations at the University of Virginia, UVIMCO’s Chief Executive Officer, and the President’s Designee.

Periodic Review and Disclosure

This policy will be periodically reviewed by UVIMCO’s Board of Directors as needed. UVIMCO will include this policy in its Employee Handbook and will provide a copy of the policy to depositor organizations upon request.