METROPOLITAN GOVERNMENT OF NASHVILLE & DAVIDSON COUNTY

Metropolitan Government of Nashville and Davidson County - Finance Dept. Policy: Federal Tax Compliance Policies and Procedures

Effective Date: December 22, 2011
Revision Date: September 16, 2025
Policy Number: 3.12
Sponsor: Office of the Treasurer

Purpose

This Federal Tax Compliance Policies and Procedures (the "**Policy**") sets forth certain requirements for compliance by The Metropolitan Government of Nashville and Davidson County (the "**Issuer**" or "**Metropolitan Government**") pursuant to Sections 141-150 of the Code (as defined herein). In order to issue tax-exempt debt obligations and other related debt securities ("**Tax-Exempt Obligations**"), the interest on which is excluded from gross income of the holders of such debt obligations, the Metropolitan Government must comply with federal taxation rules regarding: (i) expenditure of proceeds; (ii) use of financed property; (iii) investment of proceeds in compliance with federal arbitrage rules; and (iv) retention of certain records and filings with the Internal Revenue Service pursuant to Section 148 of the Internal Revenue Code of 1986, as amended (together with the rules and regulations promulgated thereunder, the "**Code**").

As an issuer of municipal securities, the Metropolitan Government has an obligation to meet primary, secondary, and continuing disclosure compliance requirements in accordance with the Securities and Exchange Commission ("**SEC**") Rule 17(a) and Rule 10b-5, as well as certain requirements contained in continuing disclosure agreements executed by the Metropolitan Government pursuant to SEC Rule 15c2-12 in connection with the issuance of its Tax-Exempt Obligations. This Policy is applicable to Tax-Exempt Obligations issued by the Metropolitan Government for general governmental purposes, as well as for the benefit of its (i) District Energy System and (ii) Water and Sewer Systems.

This Policy is also applicable to Tax-Exempt Obligations issued by The Sports Authority of The Metropolitan Government of Nashville and Davidson County (the "**Sports Authority**"), and The Convention Center Authority of The Metropolitan Government of Nashville and Davidson County (the "**Convention Center Authority**"), both of which are public instrumentalities of the Issuer and both of which rely exclusively on the Issuer with respect to compliance with certain federal taxation and securities requirements.

This Policy also establishes the framework and practices necessary to ensure primary, secondary, and continuing disclosure compliance for the Metropolitan Government, including for the benefit of the District Energy System and the Water and Sewer Systems, but excludes the Nashville Electric System.

Definitions

In addition to the terms defined herein, the following capitalized terms shall be ascribed the following meanings in this Policy:

"ACFR" means the annual comprehensive financial report of the Metropolitan Government or any other department, instrumentality, or agency of the Metropolitan Government, if an annual comprehensive financial report is prepared with respect to such department, instrumentality, or agency, to the extent the same is responsive to any Rule Undertakings.

"Annual Filing" means the ACFR, or any other annual filing of financial information and operating data required to be filed pursuant to the Rule Undertakings and any other information which the Metropolitan Government may elect to include in any such annual filing.

"Annual Filing Date" means the date, set forth in each Rule Undertakings, by which the Metropolitan Government is required to file the Annual Filing.

"Audited Financial Statements" means the financial statements of the Metropolitan Government or of any department, instrumentality or agency, as audited by an independent auditor, if financial statements are prepared and audited with respect to such department, instrumentality, or agency, to the extent the same is responsive to any particular Rule Undertakings.

"Bond Counsel" means a nationally recognized bond counsel firm designated by the Metropolitan Government to act as bond counsel, or any successor nationally recognized bond counsel designated by the Metropolitan Government.

"Compliance Certificate" means the certificates and the reports attached thereto from the Dissemination Agent relating to the Metropolitan Government's compliance with the Rule Undertakings.

"Compliance Management Records" means certain records relating to the Disclosure Obligations, which shall include: (i) the Disclosure Documents; and (ii) certain information relating to training sessions, including attendance records and training materials.

"Contributor" means those Metropolitan Government officials and staff who are engaged by the Disclosure Management Group, the Metropolitan Treasurer, or their respective designees to review and/or prepare any Disclosure Documents and/or certain other disclosures or portion(s) thereof using their knowledge of the Metropolitan Government, its operations and/or other relevant and material information, including, but not limited to: (i) the Deputy Director of Finance, (ii) the Chief Accountant, (iii) the Assistant Treasurer, (iv) the Debt Manager, (v) the Assistant Metropolitan Attorney, and (v) the finance directors (or equivalent positions) of relevant departments, agencies and instrumentalities of the Metropolitan Government.

"Disclosure Counsel" means a nationally recognized disclosure counsel firm designated by the Metropolitan Government to act as disclosure counsel, or any successor nationally recognized disclosure counsel designated by the Metropolitan Government.

"Disclosure Documents" means the: (i) Offering Documents; (ii) the Rule Undertakings; and (iii) the Filings.

"Disclosure Management Group" means the Metropolitan Treasurer and an internal working group to be established by the Metropolitan Treasurer composed of certain Metropolitan Government officials and staff which the Metropolitan Treasurer may engage to assist in the implementation of the Disclosure Procedures, including, but not limited to: (i) the Deputy Director of Finance, (ii) the Chief Accountant, (iii) the Assistant Treasurer, (iv) the Debt Manager and (v) the Assistant Metropolitan Attorney.

"Disclosure Obligations" means the applicable federal and state securities laws, including, but not limited to: (i) SEC Rule 17(a); (ii) SEC Rule 10b-5; (iii) Rule 15c2-12; and (iv) the Rule Undertakings.

"Disclosure Procedures" means the policies and procedures created by the Metropolitan Government regarding its primary, secondary, and continuing disclosure compliance standards in accordance with applicable federal and state securities laws, including, but not limited to: (i) SEC Rule 17(a); (ii) SEC Rule 10b-5; (iii) Rule 15c2-12; and (iv) the Rule Undertakings.

"Dissemination Agent" means the Metropolitan Government, or any third-party retained by the Metropolitan Government to act in the capacity as dissemination agent, or any successor dissemination agent retained by the Metropolitan Government.

"Filing" means the ACFR or any Annual Filing, Notice Event Filing, Voluntary Filing, or any other filing required or made under the Rule Undertakings.

"Financing Team" means the Metropolitan Government employees, Bond Counsel, Disclosure Counsel, and any other consultants engaged by the Metropolitan Government in connection with a particular Transaction.

"Fiscal Year" means the fiscal year of the Metropolitan Government, which currently is the twelve-month period beginning July 1 and ending on June 30 of the following year.

"Notice Event Filings" means those required filings regarding the occurrence of certain events listed under the Rule Undertakings.

"Obligated Person" shall have the meaning as set forth in Rule 15c2-12.

"Offering Documents" means preliminary and/or final official statements, offering memoranda, private placement memoranda and remarketing memoranda, together with any supplements thereto, relating to debt securities issued by the Metropolitan Government and/or debt securities for which the Metropolitan Government is an Obligated Person.

"Repository" means each repository authorized and approved by the SEC from time to time to act as a repository for purposes of complying with Rule 15c2-12. As of the effective date of the Disclosure Procedures, the only repository recognized by the SEC for such purpose is the Municipal Securities Rulemaking Board (MSRB), which currently electronically accepts filings through the Electronic Municipal Market Access (EMMA) data port system, on its website at http://emma.msrb.org.

"Rule 15c2-12" or "Rule" means SEC Rule 15c2-12 promulgated pursuant to the Securities Exchange Act of 1934, as the same may be amended from time to time. https://www.sec.gov/municipal/municipal-securities-disclosure.html

"Rule Undertakings" means those certain undertakings or agreements executed and delivered by the Metropolitan Government, the Convention Center Authority, and/or the Sports Authority as a condition precedent to the initial purchase of its securities by the original purchasers required to comply with Rule 15c2-12, under which it has agreed to provide Annual Filings, Notice Event Filings or any other filing required under such undertakings or agreements.

"SEC" means the United States Securities and Exchange Commission.

"Third Party Contributor" means any third-party who is engaged by the Metropolitan Treasurer, the Disclosure Management Group, a Contributor or their respective designees to review and/or prepare any Disclosure Document and/or certain other disclosures or portion(s) thereof using their knowledge of the Metropolitan Government, its operations and/or other relevant and material information.

"Transaction" means any debt offering or borrowing transaction of the Metropolitan Government the Convention Center Authority, or the Sports Authority with respect to which any Disclosure Obligations are implicated.

"Underwriting Period" shall have the meaning as set forth in Rule 15c2-12.

"Voluntary Filings" means those filings that are not required under the Rule Undertakings.

I. Expenditures of Proceeds

The expenditure of proceeds, as set forth below, will be reviewed and managed by the Issuer's Chief Accountant and Metropolitan Treasurer as needed to ensure compliance with the requirements with each tax certificate executed in connection with its Tax-Exempt Obligations. In connection with such review and management, the Chief Accountant will undertake the following responsibilities with respect to the expenditure of proceeds of Tax-Exempt Obligations:

a) Establish applicable forms and procedures for documenting expenditures of the Tax-Exempt Obligations, including for (i) new-money issues through providing a description of the property financed with each expenditure and (ii) refunding issues through providing a description of the refunded obligations and the property financed with the refunded obligations; and
b) Only permit proceeds of Tax-Exempt Obligations to be expended for: (i) capital expenditures; (ii) working

capital, if accompanied by an opinion of Bond Counsel; (iii) refunding of Tax-Exempt Obligations and other debt obligations used for the foregoing purposes; (iv) the funding of debt reserve funds to the extent permitted by the Code; (v) and certain costs of issuance related to the Tax-Exempt Obligations; and

c) Monitor and restrict the use of certain expenditures to pay capitalized interest on Tax-Exempt Obligations, except during the actual construction period of the relative financed property, unless such action is performed in accordance with an opinion issued by Bond Counsel authorizing such action and use of expenditures.
d) Limit reimbursement of costs to those incurred after, or within 60 days before, the Metropolitan Government adopts a 'Declaration of Intent,' unless otherwise permitted by the Code and approved by Bond Counsel.
e) For new-money issues, prepare a "Final Allocation of Proceeds" to uses, which will be retained with the records of the Tax-Exempt Obligations, and made not later than eighteen (18) months after the placed-in-service date of the financed property (and in any event not later than five (5) years and sixty (60) days after the issuance of the Tax-Exempt Obligations); and
f) Monitor the expenditures of proceeds of the new-money Tax-Exempt Obligations against any related expectations identified in the tax certificate related to such issuance of Tax-Exempt Obligations and
g) Monitor the expenditures of proceeds of the Tax-Exempt Obligations against the schedule for any arbitrage rebate exception or exceptions identified in the tax certificate related to such issue of Tax-Exempt Obligations; The Metropolitan Treasurer will undertake the following responsibility with respect to the expenditure of proceeds of Tax-Exempt Obligations.
h) Coordinate the engagement of an outside consultant, recognized as a rebate analyst entity, to timely prepare arbitrage rebate report(s) as required under the Code.

II. Use of Property Financed with Tax-Exempt Obligations and Remediation Upon Change in Use

The Issuer will not do any of the following with respect to the financed property without prior discussion with Bond Counsel and Disclosure Counsel regarding the potential impact of such action affecting the tax-exempt status of the Tax-Exempt Obligations that financed or refinanced such property:

a) Enter into a management, service or incentive payment contract with any non-governmental person or entity (including the federal government) (a "**Non-Governmental Person**").
b) Enter into a lease with any Non-Governmental Person.
c) Sell or otherwise transfer such property to any Non-Governmental Person.
d) Grant special legal entitlements with respect to such property to any Non-Governmental Person.
e) Enter into an "output contract", as defined in Section 1.141-7 of the Treasury Regulations promulgated under the Code, which has the effect of transferring the benefits of owning the financed facility and the burden of paying debt service on the relative Tax-Exempt Obligation to a Non-Governmental Person.

If any action occurs, notwithstanding the foregoing, that causes Tax-Exempt Obligations to become private activity bonds as a result of private use of financed projects and/or private payments for parties utilizing such financed projects, the Issuer will promptly consult with Bond Counsel and Disclosure Counsel as to the appropriate steps to take in order to timely remedy such change in use in accordance with the applicable regulations under the Code, including the remediation of nonqualified bonds.

III. Investment of Proceeds

Investment of proceeds of Tax-Exempt Obligations in compliance with the Issuer's Debt Management Policy, applicable provisions of Tennessee law ("**Permitted Investments**"), arbitrage bond rules, and rebate of arbitrage, each will be monitored and supervised by the Metropolitan Treasurer.

All proceeds of each Tax-Exempt Obligation will be deposited and maintained in a separate account or accounts. The investment of Tax-Exempt Obligations proceeds shall comply with the following:

a) Permitted Investments will be purchased only in market transactions at fair market value.

b) Calculations of arbitrage rebate liability will be performed periodically, as set forth in the tax certificate, by outside consultants unless the Issuer is eligible for an exception to arbitrage rebate liability with respect to the Tax-Exempt Obligations.
c) Arbitrage rebate payments, if required, will be made with Form 8038-T no later than sixty (60) days after: (i) each fifth (5th) anniversary of the date of issuance of the Tax-Exempt Obligations; and (ii) the final retirement date of the Tax-Exempt Obligations. Compliance with arbitrage rebate requirements will be reported to the bond trustee, if any, and the Issuer.
d) The Issuer will identify the date for first arbitrage rebate payment at time of issuance of the Tax-Exempt Obligations, if any arbitrage rebate payments are expected to be made.

IV. Records

Management and retention of records related to Tax-Exempt Obligations will be monitored and supervised by the Metropolitan Treasurer and the Chief Accountant in the following manner:

a) Records will be retained for the life of the Tax-Exempt Obligations, plus any refunding bonds plus six (6) years. Such records may be retained in physical form with paper copies or may be retained in digital form with electronic copies. Such records must be appropriately indexed to each specific Tax-Exempt Obligation issuance and its related compliance functions.
b) Retain records pertaining to the issuance of Tax-Exempt Obligations, including physical or digital copies of the final transcript of documents executed in connection with the issuance of the Tax-Exempt Obligations, along with any supplements or amendments, and copies of any arbitrage rebate calculations and records of such payments being made with Form 8038-T.
c) Retain records pertaining to certain expenditures of proceeds of Tax-Exempt Obligations including any (i) requisitions, (ii) Declaration of Intent, (iii) reimbursement resolutions, (iv) trustee statements (if any), and (v) Final Allocation of Proceeds.
d) Retain records pertaining to use of the financed property, including all agreements reviewed for nonexempt use and any reviewed documents relating to unrelated business activity.
e) Retain records pertaining to investments, including GIC and hedge documents under the Treasury Regulations, records of purchase and sale of other investments, and records of investment activity sufficient to permit calculation of arbitrage rebate or demonstration that no arbitrage rebate is due.

V. Miscellaneous Post-Issuance Changes

The Metropolitan Treasurer will consult with Bond Counsel and Disclosure Counsel prior to engaging in any activity regarding post-issuance credit enhancement transactions (*e.g.*, letter of credit or bond insurance) or hedging transactions (*e.g.*, interest rate swaps).

The Metropolitan Treasurer will consult with Bond Counsel and Disclosure Counsel prior to the making of any significant modifications to the bond documents or Disclosure Documents that might cause a “reissuance” of the Tax-Exempt Obligations, as more fully described in Section 1.1001-3 of the Treasury Regulations, such as: (i) changes in the yield of a Tax-Exempt Obligation; (ii) changes in the timing of scheduled payments on Tax-Exempt Obligations; or (iii) changes in the obligor of or security for Tax-Exempt Obligations.

VI. Disclosure Management Group

The Disclosure Management Group and Disclosure Counsel are responsible for ensuring the Metropolitan Government’s compliance with its applicable Disclosure Obligations. The Disclosure Group and Disclosure Counsel will be responsible for the following responsibilities:

a) Monitor and supervise the Metropolitan Government to remain in compliance with its Disclosure Procedures;
b) Review any Compliance Certificates to determine the level of the Metropolitan Government’s compliance with the Rule Undertakings;
c) Review and recommend updates of the Disclosure Procedures, as needed;

d) Oversee the preparation of all Offering Documents and review and approve the form and content included within such Offering Documents before such documents are disseminated to the public and municipal securities market;
e) Review and approve any Disclosure Documents and/or certain other relevant disclosures before such documents are disseminated to the public and municipal securities market;
f) Review and approve forms of the Rule Undertakings before such documents are disseminated to the public and municipal securities market, to ensure that: (i) the financial information and operating data, included therein, that was undertaken to be disclosed on a continuing basis is appropriate based on the source of revenues pledged as security for the applicable Tax-Exempt Obligations; and (ii) the coordination for delivery of the Filings required under the Rule Undertakings are reasonable and will allow the Metropolitan Government adequate time to prepare and appropriately file its required Filings;
g) Review and approve Filings before such documents are disseminated to the public and municipal securities market;
h) Coordinate with the Metropolitan Government on the appropriate logistics, communications, and course of action for any potential occurrences that may arise regarding: (i) whether any such occurrence requires a Notice Event Filing or a Voluntary Filing that may prompt immediate public disclosure; and (ii) whether a Notice Event Filing or a Voluntary Filing should be prepared and disseminated to the public and municipal securities market;
i) Review any disclosure requirements and/or implications of any material changes in the accounting principles and practices of the Metropolitan Government or any of its quasi-governmental entities that may affect their respective ACFRs or other related financial statements and general operating data.

VII. Primary Disclosure

The Disclosure Management Group and Disclosure Counsel will review Offering Document(s) related to any Transaction of the Metropolitan Government, and any other applicable Disclosure Documents relative to any other necessary disclosures to:

a) Identify certain information in the applicable Offering Documents that was previously disclosed to the public and municipal securities market that may require an update to maintain accuracy and completeness; such information may include, but is not limited to:
    a. Information related to the sources of revenue pledged as security for the particular Tax-Exempt Obligations;
    b. Description of any intergovernmental agreements or other applicable agreements related to the Transaction, if any;
    c. Outstanding debt and other financial obligations (e.g., pension obligations, other post-employment benefits and other financial obligations, swap agreements);
    d. Estimated debt service obligations and historical debt service coverage, if applicable;
    e. General description of the Metropolitan Government and certain general information relating to the demographic and economic statistics of the Metropolitan Nashville geographical area to the extent such information is relevant and /or material to the particular Tax-Exempt Obligations;
    f. General description regarding pending, threatened or ongoing litigation and pending or recently adopted legislation to may affect the validity or tax-exempt status of the Tax-Exempt Obligations;
    g. The proposed statement regarding the Metropolitan Government's ongoing compliance with its previous Rule Undertakings during the related five (5) year due diligence and continuing disclosure compliance period.
b) Identify the financial information and operating data to be included in the form of Rule Undertaking for the Transaction and confirm whether the form of Rule Undertaking should be changed or updated;
c) Identify the Contributors and/or Third-Party Contributors relevant to the Transaction and assign the appropriate tasks and responsibilities to each Contributor and/or Third-Party Contributor;
d) Solicit information from the appropriate Contributors and/or Third-Party Contributors and provide reasonable timeline for such contributors to provide the requested information and review and update, as needed, those portions of the Offering Document assigned to each of them;
e) Schedule meetings or conference calls, as needed, with the Financing Team to discuss the drafts of the Offering Document and any outstanding issues relating to the Transaction;

f) Schedule meetings or conference calls, as needed, to review the rating agency presentation before submittal to the rating agencies and confirm the accuracy of the information contained there and within the Offering Documents, as applicable;
g) Schedule meetings or conference calls, as needed, to review and prepare responses to due diligence questionnaires or inquiries received from underwriters, purchasers, rating agencies, credit enhancers, etc.;
h) Prior to disseminating Offering Documents and the form of Rule Undertaking(s) (included therein) to the public and municipal securities market, the Disclosure Management Group and Disclosure Counsel will first schedule the necessary meetings or conference calls with the Financing Team and approve the Offering Documents and form of Rule Undertakings (included therein) when, in its best judgment, the information in such Offering Document and form of Rule Undertakings satisfies the applicable requirements of the Disclosure Obligations and the provisions of any required authorizing documents and such Offering Documents and form of Rule Undertakings are deemed to be in substantially final form;
i) After pricing the Tax-Exempt Obligations, the Disclosure Management Group and Disclosure Counsel will review and approve the revised Offering Document for execution by the appropriate Metropolitan Government officials and staff when, in its best judgment, the information contained in such Offering Document and form of Rule Undertakings satisfies the applicable requirements of the Disclosure Obligations and the provisions of any required authorizing documents and such Offering Document and form of Rule Undertakings are deemed to be in final form; and
j) Review and evaluate any material changes to the Offering Documents from and after the dissemination of the previous version of such Offering Document up to and including the date of delivery of the Tax-Exempt Obligations and through the applicable Underwriting Period.

VIII. Secondary Disclosure

To ensure compliance with the Metropolitan Government's secondary Disclosure Obligations, the Disclosure Management Group and Disclosure Counsel will:

a) Review all information included in the Annual Filing, including the ACFR from the previous Fiscal Year;
b) Review the financial information and operating data required to be disclosed under the Rule Undertakings entered into since the last Annual Filing;
c) Identify any necessary changes or updates to the Annual Filing for the current Fiscal Year to ensure accuracy and completeness;
d) Discuss the logistics and establish a timetable with the Metropolitan Government to complete the necessary tasks and to receive the required information to timely file the Annual Filing on or before the applicable Annual Filing Date;
e) Identify any potential issues that may impact such established timetable and develop a contingency plan, as needed, to remedy such issues (e.g., file unaudited financial statements or file an amended and restated Annual Filing);
f) Before the Annual Filing Date, solicit the necessary information from the appropriate Contributors and/or Third-Party Contributors to ensure accuracy and completeness of the Annual Filing;
g) Before the Annual Filing Date, prepare a draft of the Annual Filing for review, finalization, and sign-off by the Metropolitan Government;
h) Confirm the list of CUSIP numbers for the outstanding Tax-Exempt Obligations;
i) Timely transmit the Annual Filing to the Repository; and
j) Obtain or complete a completion certificate.

IX. Notice Event Filings

Upon receiving notice of the occurrence of an event that may require a Notice Event Filing under the applicable Rule Undertaking, the Disclosure Management Group and Disclosure Counsel may:

a) Immediately discuss with the appropriate Contributors and/or Third-Party Contributors, whether the occurrence of such event requires a Notice Event Filing;

b) Solicit the necessary information from the appropriate Contributors and/or Third-Party Contributors to prepare the Notice Event Filing;
c) Confirm the list of CUSIP numbers for the relative Tax-Exempt Obligations;
d) Review the draft of the Notice Event Filing; and
e) Timely transmit the Notice Event Filing to the Dissemination Agent for filing with the Repository or to the Metropolitan Government for filing with the Repository.

X. Voluntary Filings

In considering whether and when to make a Voluntary Filing, the Disclosure Management Group and Disclosure Counsel may:

a) Discuss with the appropriate Contributors and/or Third-Party Contributors whether a Voluntary Filing related to the occurrence of the event in question, or the availability of certain information is advisable;
b) Solicit the necessary information from the appropriate Contributors and/or Third-Party Contributors to prepare the Voluntary Filing;
c) Review the draft of the Voluntary Event Filing;
d) Confirm the list of CUSIP numbers for the relative Tax-Exempt Obligations; and
e) Timely transmit the Notice Event Filing to the Dissemination Agent for filing with the Repository or to the Metropolitan Government for filing with the Repository.

XI. Overall Responsibility

The overall administration and coordination of this Policy is the responsibility of the Metropolitan Treasurer and the Chief Accountant. Such officers shall be responsible for identifying any violations of federal taxation and securities compliance requirements relating to any Tax-Exempt Obligations and shall consult with Bond Counsel and the Disclosure Counsel as to the best course of action and methodology for the timely disclosure and correction of any identified violations or misinformation of material fact, either through available remedial actions or through the Internal Revenue Service's Voluntary Closing Agreement Program.

In ensuring timely compliance with the Metropolitan Government's Disclosure Obligations hereunder, the Disclosure Management Group and Disclosure Counsel will:

a) Monitor compliance with the Disclosure Procedures set forth herein;
b) Review any Compliance Certificates to determine the requisite level of compliance with the Rule Undertakings;
c) Periodically review and provide necessary updates to the Disclosure Procedures, as set for the herein.

Applicable Local, State or Federal Regulations

Metro. Charter art. 8 ,§ 8.103: The director of finance shall be responsible to the mayor for the administration of the financial affairs of the metropolitan government.

Metro. Charter art. 8, § 8.104: The budget officer, with the advice and assistance of the chief accountant, shall write, revise and maintain a proper standard procedure instruction manual to be followed by all officers, departments, boards and other agencies of the government to ensure uniform accounting and budgetary procedures.

Metro. Charter art. 8, § 8.105: The chief accountant shall maintain a general accounting system and such cost accounting records as shall be required by the director of finance.

Metro. Charter art. 8, § 8.8.106: The metropolitan treasurer shall supervise and be responsible for the custody and disbursement of all funds belonging to the metropolitan government and all funds handled by metropolitan government officers as agents or trustees except as otherwise provided in this Charter or by ordinance or general law not inconsistent with this Charter.

Metro Bill Ordinance BL2023-1872

Sections 141-150 of the U.S. Internal Revenue Code (IRC)

Securities and Exchange Commission ("**SEC**") Rule 17(a), Rule 10b-5, and Rule 12c-2-12

Associated Policies

None.

Effective Date

This Policy Statement shall become effective upon issuance and shall be applied to all Metro departments and agencies.

Approvals

Approval of the Director of Finance

I hereby approve this Policy Statement of the Department of Finance and as such agree with and authorize the actions necessary to implement its requirements.

Jenneen Reed

Director of Finance

Date: September 16, 2025