

ATTACHMENT D
Investment Accounting General Data Requirements

- For investment accounting purposes:
 - o If NYSIF engages an external service provider to perform recording of investment transactions for accounting purposes, which (as of November 2024) is currently the case and is not expected to change in the foreseeable future, then MANAGER, or GENERAL PARTNER for investments in which NYSIF is a limited partner, shall provide files and other resources required by the external service provider. Files shall be provided:
 - In required formats, with respect to:
 - File format. Required file formats are standard (e.g., .CSV, .XLSX) and do not require specialized software (beyond software that can generate .XLSX files, e.g., Microsoft Excel).
 - Data field ordering and formatting.
 - Including all data the service provider requires.
 - With required frequency (e.g., daily/monthly).
 - By required deadlines.

NYSIF's current external service provider has provided NYSIF the below listing of required files and resources. However, should NYSIF's external service provider require additional files or resources, MANAGER or GENERAL PARTNER shall work in good faith with NYSIF to provide such additional files or resources.

- For public equity / fixed income:
 - Daily position file.
- For syndicated loans (bank loans):
 - Daily position file.
 - Daily trade (buy/sell) file.
- For fixed income private placement securities:
 - Daily position file.
 - Daily trade (buy/sell) file.
 - Daily security master file.
 - Monthly file with final market prices and security-level (not issuer-level) credit ratings as of the previous month-end.
 - o MANAGER may compute/determine market prices in the absence of observable market prices. The general methodology used by MANAGER to compute/determine market prices must be disclosed and acceptable to NYSIF. MANAGER must provide NYSIF documentation, which NYSIF determines meets its requirements, regarding the general methodology.
 - o For each security, if credit ratings are available from Nationally Recognized Statistical Rating Organizations (NRSROs) whose ratings are accepted by the National Association of Insurance Commissioners (NAIC) for Statutory Accounting purposes, MANAGER shall provide such ratings to NYSIF. A listing of such NRSROs can be found in the latest available "Purposes & Procedures Manual of the NAIC Investment Analysis Office." As of December 2023 (the latest guidance available as of November 2024), acceptable NRSROs included:

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- Moody's Investors Service, Inc.
- S&P Global Ratings
- Fitch Ratings, Inc.
- A.M. Best Rating Services, Inc.
- DBRS, Inc. (DBRS Morningstar)
- Kroll Bond Rating Agency, LLC.
- Egan-Jones Ratings Co.
- HR Ratings de Mexico, S.A. de C.V.
- If no acceptable NRSROs provide a credit rating for a security, MANAGER shall provide an internally determined credit rating (a credit rating MANAGER determines through a consistently applied process). If this provision applies to at least one security, MANAGER shall provide NYSIF information regarding MANAGER's methodology for determining credit ratings, at a level of depth meeting NYSIF's requirements.
- Where NYSIF is a limited partner in a "private markets" asset class (such as private credit, private equity, private infrastructure, or private real estate):
 - The accounting services provider requires access to GENERAL PARTNER's website where statements and other documents routinely required for private markets investments are made available. Such websites are often called "user portals." If GENERAL PARTNER does not maintain a user portal, GENERAL PARTNER shall provide statements and other documents directly to the accounting services provider and to NYSIF.
- For asset classes not listed here: MANAGER or GENERAL PARTNER shall consult with NYSIF, which shall provide requirements to MANAGER or GENERAL PARTNER, and MANAGER or GENERAL PARTNER shall confirm to NYSIF its acceptance of requirements prior to the engagement's commencement.
- If NYSIF changes from externally provided accounting services to internally recording investment transactions for accounting purposes, then MANAGER or GENERAL PARTNER shall work in good faith with NYSIF to accommodate reasonable timelines, methods, data sets, and formats set forth by NYSIF to enable timely recording of transactions.