ANNUAL TREASURY MANAGEMENT STRATEGY STATEMENT 2023/24

(INCLUDING ANNUAL INVESTMENT STRATEGY 2023/24, PRUDENTIAL INDICATORS AND MINIMUM REVENUE PROVISION POLICY STATEMENT)

1. Introduction

- 1.1. Westmorland & Furness Council ("the Council") is required by statute to operate a balanced revenue budget, which broadly means that cash raised during the year will meet cash expenditure. The primary function of the Treasury section within the Finance team, is to manage the cash flow planning (both in the short and longer term) to ensure that the Council can meet its revenue and capital spending obligations. In terms of capital spending, this may involve arranging long or short term loans (i.e. borrowing), or using longer term cash balances, in lieu of external borrowing. Finance must:
 - ensure the Council's short term cash reserves are securely held (i.e. security of principal);
 - ensure appropriate levels of cash are available to manage day to day payments (i.e. liquidity); and
 - after both the above have been considered to maximise investment returns (i.e. income generation).
- 1.2. The Council follows the requirements of the Chartered Institute of Public Finance and Accountancy's (CIPFA) Code of Practice for Treasury Management in Public Services (the CIPFA TM Code) and the Prudential Code for the management of its Treasury functions. CIPFA defines treasury management as:

"The management of the local authority's borrowing, investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks."

- 1.3. This Treasury Management Strategy Statement ("TMSS") is the first such document for the Council with each preceding sovereign Council having previously approved a TMSS for their own organisation. This Treasury Management Strategy Statement includes historic data for comparative purposes to ensure compliance with regulatory reporting requirements, however this should be used for indicative purposes and noting that this is consolidated from the four sovereign Councils that preceded Westmorland & Furness Council.
- 1.4. During 2021/22 CIPFA consulted on revisions to the CIPFA TM Code and Prudential Code. The aim of the revisions is to strengthen the provisions

within the Codes relating to commercial investment, focusing on sustainability and affordability, and to ensure the TM Code remains fit for purpose. Subsequently, revised codes were issued by CIPFA in December 2021.

- 1.5. In accordance with the revised Code, this TMSS includes a new Treasury Management Prudential Indicator the "Liability Benchmark". Inclusion of this liability benchmark has only been mandated from 2023/24 and therefore sovereign Councils were not previously required to include this information.
- 1.6. In addition, the revised Treasury Management Code requires all investments and investment income to be attributed to one of the following three purposes treasury management, service delivery, and commercial return. Risks on investments held for commercial return (primarily for financial return with no treasury management or direct service provision purpose) should be proportionate to an authority's financial capacity i.e. 'plausible losses' could be absorbed in budgets or reserves without unmanageable detriment to local services. An authority must not borrow to invest primarily for financial return.
- 1.7. The CIPFA TM Code and Prudential Code require that local authorities determine their Treasury Strategy and Prudential Indicators on an annual basis in advance of the new financial year. To ensure compliance with this requirement, this paper sets out the draft Treasury Strategy for operations during 2022/23 for consideration by Council. The report is separated into four sections:-

Treasury Management Strategy (Section 2) – This details the estimated value and rates at which borrowing may be undertaken to finance current and future capital spend. The main objective is to manage risk effectively while minimising interest costs. The value of the Capital Programme and how it is financed i.e. long term borrowing; revenue financing; grants; etc. is therefore intrinsically linked. As such borrowing strategies are dependent on the decisions made about the revenue and capital budgets and the two should be considered together.

Annual Investment Strategy (Section 3) – The Annual Investment Strategy sets out the policies which govern the management of the Council's investments. The Council's investment strategy is risk averse with security and liquidity of cash assets taking precedence over returns. To do this the Council uses a prescriptive list of counterparties with whom new investments can be placed. Money is placed across a range of the highest rated counterparties possible to maximise security.

Capital Plans and Prudential Indicators (Section 4) – The Local Government Act 2003 includes the requirement that Local Authorities have regard to the Prudential Code (the Code). The Code requires the Council to assess its capital investment plans and ensure they are affordable, prudent and sustainable. This must be substantiated by the production of a range of prudential indicators, which cover capital investment and treasury management plans for the forthcoming three years.

Minimum Revenue Provision (MRP) Policy Statement (Section 5) – This sets out how the Council will pay for the financing of capital assets by way of an annual charge to the revenue budget, hence the reason that approval of

- the annual budget must be considered in tandem to the Treasury Management Strategy and MRP Policy Statement.
- 1.8. In addition to the above, the Prudential Code requires that authorities have in place a capital strategy that sets out the long-term context in which capital expenditure and investment decisions are made and gives due consideration to both risk and reward and impact on the achievement of priority outcomes. This is presented as a separate appendix to the Medium Term Financial Strategy report.

2 TREASURY MANAGEMENT STRATEGY FOR 2023/24

2.1 The Treasury Strategy for 2023/24 covers the current debt and investment portfolios, interest rates, the borrowing strategy/policy and rescheduling, training, use of specialist advisors, and reporting.

2.2 Current Debt and Investment Portfolio

2.2.1 The following table details the Council's allocation of current long term borrowing and investments novating from sovereign Council's as at 31 December 2022:

External borrowing and investments	Principal (as at 31 Dec '22) £m	Average Interest Rate %	Average Life Years
Total External Borrowing	193.3	3.84	25.5
Total Treasury Investments	158.6	3.09	< 1 year
Net Debt	34.7		

- 2.2.2 Council borrowing novated from sovereign Councils is primarily sourced from the Public Works Loan Board (PWLB) at fixed rates determined at the time the borrowing was undertaken, and £13m taken from the Money Market. Annex A provides a graphical analysis and full list of the Council's debt portfolio to be novated from sovereign Councils, including the maturity profile and rates of interest.
- 2.2.3 Treasury activity and planning over recent years within the sovereign Councils has provided a stable debt portfolio. This stability allows Westmorland & Furness Council to maintain an under-borrowed position, using temporary cash balances, instead of externalising borrowing. This policy will help reduce the interest cost of funding the capital programme whilst also reducing counterparty risk. An increased level of internal borrowing does however bring additional interest rate risk.

2.3 Prospects for Interest Rates

2.3.1 The Council has contracted with Link Treasury Services for the provision of treasury management advisory services. Link Treasury Services has provided

the following forecast of future Bank Rate and PWLB borrowing rates as at 6 February 2023.

			Intere	st Rate Fore	ecasts			
Bank Rate	Mar-23	Jun-23	Sep-23	Dec-23	Mar-24	Jun-24	Sep-24	Dec-24
Link	4.25%	4.50%	4.50%	4.50%	4.00%	3.75%	3.50%	3.25%
Cap Econ	4.25%	4.50%	4.50%	4.50%	4.25%	4.00%	3.50%	3.00%
5Y PWLB RAT	ſΕ							
Link	4.20%	4.20%	4.10%	4.00%	3.90%	3.80%	3.60%	3.50%
Cap Econ	3.75%	3.65%	3.60%	3.50%	3.45%	3.35%	3.30%	3.25%
10Y PWLB RA	TE							
Link	4.40%	4.40%	4.30%	4.10%	4.00%	3.90%	3.80%	3.60%
Cap Econ	3.80%	3.70%	3.65%	3.55%	3.50%	3.40%	3.35%	3.30%
25Y PWLB RA	TE							
Link	4.60%	4.60%	4.50%	4.40%	4.20%	4.10%	4.00%	3.90%
Cap Econ	4.13%	4.00%	3.93%	3.80%	3.75%	3.65%	3.60%	3.55%
50Y PWLB RA	TE							
Link	4.30%	4.30%	4.20%	4.10%	3.90%	3.80%	3.70%	3.60%
Cap Econ	3.80%	3.80%	3.80%	3.80%	3.75%	3.65%	3.60%	3.55%

- 2.3.2 In December 2021, the Monetary Policy Committee (MPC) raised the Bank Rate from an all time low of 0.10% to 0.25%. The Bank Rate has then steadily increased to the current rate (as at 6 February 2023) of 4.00%. Link Treasury Services is forecasting that the Bank Rate will increase to 4.50% by June 2023 before falling back slightly in 2024/25.
- 2.3.3 The current economic outlook and structure of market interest rates and government debt yields have several key treasury management implications:
 - In an increasing interest rate environment, overall investment returns in 2023/24 are difficult to forecast, furthermore actual returns will be dependent upon the levels of cash available for investment;
 - The policy of delaying new borrowing by running down available cash balances served some of the sovereign Councils well over the last few years. Whilst Westmorland & Furness Council will continue with this approach, this will be carefully monitored to avoid incurring higher borrowing costs in the future, when the Council will not be able to avoid new borrowing to finance new capital expenditure and/or to refinance maturing debt; and
 - There is a 'cost of carry' to any new borrowing which causes an increase in the net interest budget, (i.e. incurring a short term revenue cost due to borrowing costs currently being higher than investment returns). As such the proposed strategy continues the measured approach to balancing this short term saving against forecast longer term increased costs, but with a continual review of the underlying interest rates.

2.4 Borrowing Strategy

2.4.1 The Prudential Code only permits the Council to borrow in the long term to finance capital spend. In accordance with this the borrowing strategy details the Council's approach to funding the expected need detailed in the Capital Programme. The Treasury Management function ensures that the Council's cash is managed in accordance with the relevant professional codes and to ensure that sufficient cash is available to fund those plans. This will involve both the organisation of the cash flow and, where capital plans require, the organisation of appropriate borrowing facilities.

- 2.4.2 The Capital Programme 2023/24, which will be approved by the Shadow Authority Council in March 2023 and reviewed quarterly by Cabinet, is set out in a separate appendix to the Medium Term Financial Strategy report.
- 2.4.3 The Council's prudent borrowing strategy over the past decade has been influenced by the relationship between long and short-term interest rates. Whilst long term borrowing rates are expected to rise very slowly, they are still significantly higher than investment rates. This variance creates a 'cost of carry' for any new borrowing, if the cash borrowed is then temporarily held as investments.
- 2.4.4 This 'cost of carry' has effectively driven the borrowing strategy over the past decade during which the Council has maintained an under-borrowed position (i.e. rather than borrowing externally, the Council borrowed internally using short term cash balances). It is projected that as at 31 March 2023 c. £56.5m of cash balances will be used in lieu of external borrowing.
- 2.4.5 Looking ahead, the Council has loans of £5.0m and £1.0m due to mature in November 2023 and March 2024 respectively. A further loan of £1.0m is due to mature during 2024/25. Consideration will be given as to the affordability of refinancing these loans at or before their maturity dates if interest rates are favourable and the most effective means by which to arrange this borrowing.
- 2.4.6 The Director of Resources (Section 151 Officer) has delegated responsibility within the Constitution for the execution and administration of treasury management decisions including all borrowing, investment or financing decisions, including the use of short-term borrowing as a management tool for cash flow purposes. In accordance with this, the Director of Resources (Section 151 Officer) will continue to monitor this position and may decide to further externalise some of this requirement if it is felt that there are increasing risks relative to budgetary exposure. Aside from rising interest rates another key factor will be the expected use of cash over this period, i.e. predominantly the use of reserves.
- 2.4.7 Holding prudent levels of internal borrowing as proposed above, but keeping this and the market rates of interest under review, will enable the Council to continue to take tactical borrowing decisions by entering into long term loans when rates are comparatively low rather than being forced to refinance the borrowing when interest rates are at a higher rate.
- 2.4.8 Under normal circumstances the main sensitivities of the interest rate forecast are likely to be the two scenarios noted below. Officers will continually monitor market conditions and forecast rates in conjunction with the Council's advisors and:
 - if it was felt that there was a significant risk of a sharp FALL in long and short term rates, e.g. due to a marked increase of risks around relapse into recession or of risks of deflation, then long term borrowings will be postponed, and potential rescheduling from fixed rate funding into short term borrowing will be considered.

- if it was felt that there was a significant risk of a much sharper **RISE** in long and short term rates than that currently forecast, perhaps arising from a greater than expected increase in world economic activity or a sudden increase in inflation risks, then the portfolio position will be re-appraised with the likely action that fixed rate borrowing will be taken whilst interest rates were still relatively cheap.
- 2.4.9 In view of these factors in 2023/24 the Council will implement a strategy of using cash balances for internal borrowing whilst possible, but to also take tactical decisions to take external borrowing where considered appropriate in order to protect against rising interest rates in the future and as required for cash flow purposes. Such decisions are delegated in the Constitution to the Director of Resources (Section 151 Officer) who will approve new borrowing in consultation with the Council's external Treasury Management advisor. Any new long term borrowing will be reported through quarterly reporting to the Cabinet as per the Medium Term Financial Plan.
- 2.4.10 As noted above, the ability to defer borrowing in this way is also limited by the actual use of reserves and balances (i.e. available cash). During 2023/24, this will be monitored against forecast levels on a regular basis.
- 2.4.11 In November 2020, the Chancellor announced the current fixed margins for PWLB borrowing rates above the Government's cost of borrowing, as measured by gilt yields. At the same time, a prohibition was introduced to deny access to borrowing from the PWLB for any local authority purchasing assets purely for yield (i.e. commercial projects, particularly property investment). This Strategy confirms that future borrowing will continue to be undertaken in accordance with the Prudential Code.
- 2.4.12 The table in para 2.3.1 above sets out the current forecast rates for borrowing from the PWLB, and these are summarised in the table below. Should economic conditions lead to an expectation that borrowing rates will rise, then the Council will consider the affordability of externalising borrowing at that time.

	2023/24	2024/25	2025/26
	(Sep'23)	(Sep'24)	(Sep'25)
10 years	4.30%	3.70%	3.30%
25 years	4.50%	4.00%	3.50%
50 years	4.20%	3.70%	3.20%

2.5 Policy on Borrowing in Advance of Need

- 2.5.1 As is the requirement under the Code, the Council will not borrow in advance of need simply to benefit from earning more interest on investing the cash than is being paid on the loan. Any decision to borrow in advance will be within the approved Capital Finance Requirement estimates and then only if value for money can be demonstrated and the cash can be invested securely until it is required.
- 2.5.2 In determining whether borrowing will be taken in advance of need the Council will;

- ensure that there is a clear link between the capital programme and maturity profile of existing debt which supports taking financing in advance of need;
- ensure that the ongoing revenue implications of the borrowing, and the impact on future plans and budgets have been considered;
- evaluate the economic and market factors which might influence the manner and timing of any decision to borrow;
- consider the merits (or otherwise) of other forms of funding; and
- consider the impact borrowing could have on investment balances if it results in increased exposure to counterparty risk.

2.6 Debt Rescheduling

- 2.6.1 As it is anticipated that short term borrowing rates will be considerably cheaper than longer term fixed interest rates, there may be potential opportunities to generate savings by switching from existing long term debt to short term debt. However, these savings will need to be considered in the light of the current treasury position and the size of the cost of debt repayment (premiums incurred).
- 2.6.2 The reasons for any rescheduling of existing debt to take place will include:
 - the generation of cash savings and / or discounted cash flow savings;
 - helping to fulfil the treasury strategy; and
 - to enhance the balance of the portfolio (amend the maturity profile and/or the balance of volatility).
- 2.6.3 The rescheduling options currently available are not considered viable within the current market conditions, but the situation will be kept under constant review.

2.7 Training

- 2.7.1 The Director of Resources (Section 151 Officer) ensures that any Officer involved in the operation of the Treasury Management function, receives appropriate training relevant to their needs to ensure they fully understand their roles and responsibilities. Treasury staff will continue to attend regular courses and seminars provided by its Treasury advisors and CIPFA, and other ad hoc events including treasury software supplier forums.
- 2.7.2 In addition the Director of Resources (Section 151 Officer) ensures that elected Members who have responsiblity for scrutinising the Treasury Management Strategy Statement have access to training to give them the appropriate skills to undertake this task.

2.8 Treasury management advisors

2.8.1 The Council recognises that there is value in employing external providers of treasury management advisors in order to acquire access to specialist skills and has commissioned Link Treasury Services in that role. However, the Council recognises that responsibility for treasury management decisions remains with the Council at all times.

2.9 Reporting Arrangements

- 2.9.1 The Council follows the Chartered Institute of Public Finance and Accountancy's (CIPFA) Code of Practice on Treasury Management which lays down reporting requirements to ensure best practice. The minimum reporting requirements are for three main reports, which incorporate a variety of policies, estimates and actuals as follows:
 - An annual Treasury Strategy in advance of the new financial year (this report) which covers the annual Treasury and Investment Strategies, the Treasury and Capital Prudential Indicators and the Minimum Revenue Provision Policy Statement.
 - A mid-year Strategy Review This will update Members with the progress of the capital programme, amending prudential indicators as necessary, and will discuss whether the Treasury Strategy is still appropriate or requires revision.
 - An annual review following the end of the year comparing actual activity to the strategy.
- 2.9.2 In addition to the minimum criteria set by CIPFA, the Cabinet will receive regular treasury management activity reports within the quarterly revenue monitoring reports.

3 ANNUAL INVESTMENT STRATEGY

3.1 The Investment Strategy for 2023/24 covers the investment policy, creditworthiness policy and counterparty selection/limits, interest rates, and reporting.

3.2 The Investment Policy

- 3.2.1 The Council acts with regard to the Department for Levelling up, Housing and Communities' ("DLUHC") Guidance on Local Government Investments ("the Guidance") and the revised CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes ("the CIPFA TM Code"). The Council's investment priorities will be security first, liquidity second, then return.
- 3.2.2 In accordance with guidance from the DLUHC and CIPFA, and in order to minimise the risk to investments, the Council applies minimum acceptable credit criteria in order to generate a list of highly creditworthy counterparties which also enables diversification and thus avoidance of concentration risk.
- 3.2.3 In accordance with the Markets in Financial Instrument Directive II (MiFID II), all local authorities must be classified by financial institutions as a 'retail client' unless they are 'opted up' by firms to an 'elective professional client' status. Being a 'retail client' would result in the Council not being able to access the investment opportunities that it currently uses to implement the Treasury Management Strategy as approved annually by Council. To ensure the Council can continue to deliver on this strategy, the appropriate financial

institutions have opted up the Council to elective professional client status. This approach is consistent with other local authorities with similar Treasury Management strategies. It should be noted that this European Directive will remain in force following the UK's departure from the European Union.

3.3 Creditworthiness Policy and Counterparty Selection

- 3.3.1 The primary principle governing the Council's investment criteria is the security of its investments, although the yield or return on the investment is also a key consideration. After this main principle, the Council will ensure that:
 - It maintains a policy covering both the categories of investment types it
 will invest in, criteria for choosing investment counterparties with adequate
 security, and monitoring their security. This is set out in the specified and
 non-specified investment sections below; and
 - It has sufficient liquidity in its investments. For this purpose it will set out procedures for determining the maximum periods for which funds may prudently be committed. These procedures also apply to the Council's prudential indicators covering the maximum principal sums invested.
- 3.3.2 As with previous practice, credit ratings will not be the sole determinant of the quality of an institution and it is important to continually assess and monitor the financial sector in relation to the economic environments in which institutions operate. This total assessment will also take account of information that reflects the opinion of the markets. To this end the Council will continue to engage with its advisors to maintain a monitor on market pricing such as "credit default swaps" and overlay that information on top of the credit ratings.
- 3.3.3 Other information sources used will include, but not be limited to the financial press, share price and other such information pertaining to the banking sector in order to establish the most robust scrutiny process on the suitability of potential investment counterparties.
- 3.3.4 As at December 2022, the access to and availability of information regarding environmental, social, and governance (ESG) aspects within organisations is a fast developing area. This is one of the additional sources of information that will be used as part of the robust scrutiny process on potential counterparties for new investments, as it is important to the Council to avoid the reputational risk and adverse publicity resulting from poor governance. Should two investment options satisfy the security, liquidity and return requirements, and score the same for current creditworthiness, then the option showing the better reputational and / or environmental, social and governance scoring (if available) will be chosen.
- 3.3.5 The end product is a series of credit bands (provided by the Council's independent external advisors) which indicate the relative creditworthiness of counterparties. These bands are used by the Council to determine the recommended counterparty list, which includes limits on both period of investment and maximum value of deposits. These are detailed at 3.8.
- 3.3.6 Rating changes, rating watches (notification of a likely change), and rating outlooks (notification of a possible longer term change) are provided by the advisors as they occur and this information is always considered before dealing.

- 3.3.7 If a downgrade results in the counterparty/investment scheme no longer meeting the Council's minimum criteria, its further use for new investments will be suspended immediately. A risk assessment of the portfolio will immediately be undertaken, to consider other investments placed with the counterparty, to determine the necessity to request their immediate repayment, if possible.
- 3.3.8 The primary focus of the Investment Policy is to provide security of investments and to minimise risk. Investment instruments identified for use in the financial year are listed in 3.7 under the 'specified' and 'non-specified' investments categories.
- 3.3.9 It should be recognised that the criteria outlined within this Investment Strategy apply as and when investments are originally placed. As at 1 April 2023, the Council will have a range of investments placed by sovereign Councils in accordance with the respective Investment Strategy of the relevant sovereign Council at that time. Some of these legacy investments may not be in accordance with the criteria for taking new investments as detailed within this Investment Strategy. These legacy investments will be reviewed in 2023/24 and may be held until maturity but any new investments taken after 1 April 2023 will be compliant with this Strategy.

3.4 Country, Group and Sector limits

- 3.4.1 Due care will be taken to consider the country, group and sector exposure of the Council's investments. In addition:
 - Country limits:
 - where the country of registration of an institution has an average credit rating (i.e. an average sovereign credit rating) equal to, or better than that of the UK; it will enable the Council to consider the placement of investments on the same basis applied for UK-registered institutions (i.e. subject to the overarching counterparty criteria as set out at 3.7 and 3.8 below (Specified Investments, Non-Specified Investments and Counterparty Criteria); and
 - where an institution meets the approved counterparty status* but the country of registration has an average credit rating below that of the UK; limit such investments in total to such rated non-UK countries to be no more than 20% or £20m (whichever is the lesser) of the portfolio.
 * i.e. it meets the overarching counterparty criteria as set out at 3.7 and 3.8 below (Specified Investments, Non-Specified Investments and
 - Counterparty Criteria).
 No more than 20% will be placed with any company or group of companies (subject to the overarching requirement with regards to credit ratings as set out at 3.7 and 3.8 below (Specified Investments, Non-Specified Investments and Counterparty Criteria)), and
 - Sector limits will be monitored regularly for appropriateness.

3.5 Investment Strategy

3.5.1 Investments will be made with reference to the core cash balance and cash flow requirements and the outlook for short-term interest rates.

3.5.2 Interest rate outlook: In December 2021, the Bank of England increased the Base Rate from an all time low of 0.10% to 0.25%. The Bank Rate has steadily increased since this date and is currently at 4.00%. Link Treasury Services, the Council's external Treasury Advisor, is forecasting the rate to increase further to 4.50% by June 2023 before reducing slightly during 2023/24. At March year-ends the interest rates (as at 6 February 2023) are forecast to be:-

March 2023 4.25%March 2024 4.00%March 2025 3.00%

- 3.5.3 It should be noted that these are forecast rates and actual interest rates may differ from these projections. Should interest rates increase sooner than projected, the Council would receive better rates of return on its investments but the rate of new borrowing may also increase. Conversely, should interest rates fall or future forecast increases not materialise, the return on investments will reduce but the cost of borrowing may reduce (or remain low for longer).
- 3.5.4 The Council's average investment rate (as a combination of investments held by sovereign Council's) as at 30 December 2022 is 3.09%. The bank rate (base rate), currently 4.00%, is the key determinant as to the expected rate of return for the investment portfolio. It is expected that the bank rate will remain relatively low for at least the next 5 years, and is expected to **average** as follows;

2023/24 4.40%2024/25 3.30%2025/26 2.60%

- 3.5.5 In an economic period where bank rates are increasing, the average yield on investments received will increase over time as deals mature, assuming cash balances remain sufficiently high to ensure opportunities for longer term investments. If bank rates are expected to fall, the reverse is true, and investment returns may decrease.
- 3.5.6 To assess the performance of the investment portfolio in 2023/24, the Council will use the 7 day Sterling Overnight Index Average (SONIA) rate.

3.6 End of year Investment report

3.6.1 At the end of the financial year, the Council will report on its investment activity as part of its Annual Treasury Report.

3.7 Investment instruments – Specified / Non-specified Investments

3.7.1 <u>Specified investments</u>: (All such investments will be sterling denominated, with maturities, meeting the minimum 'high' rating criteria where applicable).

	Minimum allowable Credit Criteria	Use
Debt Management Agency Deposit Facility – UK Government	N/A (Government Backed)	In-house. Max period 6 months.
UK Government Gilts	UK sovereign rating	In-house buy and hold. Max period 5 years.
UK Government Treasury Bills	UK sovereign rating	In-house buy and hold. Max period 5 years.
Gilt Funds	UK sovereign rating	In-house. Liquid.
Deposits - local authorities	High level of security	In-house. Max period of 5 years.
UK Part nationalised Banks (the 'ring-fenced' entity)	Advisor blue category	In house. Maturity per counterparty matrix.
Term deposits – banks and building societies	Advisor green category	In-house. Maturity per counterparty matrix.
Certificates of deposit issued by rated banks and building societies	Advisor green category	In-house. Maturity per counterparty matrix.
Bonds issued by multilateral development banks	AAA	In-house buy and hold. Max period 6 months.
Low Volatility Net Asset Value Money Market Funds (formerly called Money Market Funds)	AAA Credit score of 1	In-house – liquid
Ultra-Short-Dated Bond Funds (formerly called Enhanced Money Market Funds)	AAA Credit score of 1.5	In-house – liquid

- 3.7.2 In addition to investments as referenced above, the Investment Strategy will also permit any specified investments novated into Westmorland & Furness Council on 1 April 2023 from legacy Councils that were placed in accordance with the TMSS of the respective Council. Any new specified treasury investments taken after 1 April 2023 will be compliant with the Strategy as detailed above.
- 3.7.3 <u>Non-specified investments:</u> These are any investments which do not meet the specified requirements above.

Non-specified investments have a maximum of £20m in aggregate and include an approved property fund and other approved investment funds as listed below:

Investment Fund	Limit	Use
Approved Local Authority	Maximum of 50%	
Property Fund (CCLA)	of total	As determined by
Approved Diversified Income Fund (CCLA)	investments; No maximum maturity period	S151 Officer

Other non-specified investments may include:

- 1. All specified investments with maturity periods in excess of 1 year;
- 2. Maturities of ANY period, instruments below.

	Minimum allowable Credit Criteria	Use
Fixed term deposits with variable rate and variable maturities: Structured deposits	Advisor green category	In-house. Maturity per counterparty matrix.

- 3.7.4 In addition, consideration may be given to offering commercial loans to third parties where the purpose of the loan is to provide community benefit. Such loans would be considered in accordance with the concept of security, liquidity and return. Loans would be made at commercial rates to ensure that such loans would not breach State Aid regulations.
- 3.7.5 Recipients of this type of investment are unlikely to be a financial institution and therefore unlikely to be subject to a credit rating as outlined in the creditworthiness policy above. In order to ensure security of the Council's capital, financial due diligence must be completed prior to any loan or investment being agreed. The Council will use its external Treasury Management advisors to complete financial checks to ascertain the creditworthiness of the third party and associated risks to the Council. Where deemed necessary, additional guarantees will be sought. This may be via security against assets and/or through guarantees from a parent company.

	Maximum Term:	Maximum Loan:
Third Party Commercial Loans	364 days	£5,000,000 (Maximum of 5% of portfolio in total)

Non-Treasury Investments

- 3.7.6 The Council recognises that investment in other financial assets taken for non-treasury management purposes requires careful investment management. Such activity includes loans supporting service outcomes and investments in subsidiaries.
- 3.7.7 In accordance with the TM Code, any investments that are not taken or held for treasury management purposes will be clearly identified and reported in the Capital Strategy detailing their service or commercial purposes including, where relevant, the organisation's risk appetite and specific policies and

arrangements for non-treasury investments. It is recognised that the risk appetite for these activities may differ from that for treasury management.

Investment Properties

3.7.8 The Council has 23 Investment properties including retails units and industrial sites held primarily or partially to generate a profit. They are held on the balance sheet in accordance with appropriate accounting policies.

Service Loans

3.7.9 The Council holds loans for a number of reasons primarily economic development and investment objectives or to help meet other Council priorities. These are often outside of normal commercial terms and are accounted for as soft loans.

Other Financial Instruments / Longer-duration Investments

3.7.10 During 2023/24 the Council may explore other potential financial instruments with a longer duration to increase the return on the Council's cash holdings. Where it is considered that additional financial instruments may be appropriate for the Council, the se would be recommended for inclusion in an updated Treasury Management Strategy Statement and Council approval would be sought.

3.8 Counterparty Criteria and Limits

3.8.1 The recommended counterparty criteria and limits are detailed below. These limits are applicable as at the time an investment commences.

Bank of England (Debt Management Deposit Account Facility DMADF) - No maximum limit or period.

Other Local Authorities – At the time the deposit is made, up to 20% of portfolio per counterparty, for period of up to 2 years.

Yellow – Low Volatility NAV Money Market Funds (LVMMF) with a matrix credit score of 1 or above. Subject to a maximum of £20m per MMF.

Pink – Ultra-Short-Dated Bond Funds (USDBF) with a matrix credit score of 1.5 or better (i.e. 1, 1.25, or 1.5). Subject to maximum of £20m principal per USDBF (and per counterparty in total with any other MMF held).

Purple – At the time the deposit is made, up to 20% of portfolio per counterparty, for period of up to 2 years. Subject to maximum of £20m principal per banking group.

Blue – Deposit maximum of £25m per banking group for period of up to 1 year.

Part-nationalised UK banks, must be the 'ring-fenced' entity.

Orange – At the time the deposit is made, up to 20% of portfolio per counterparty, for period of up to 1 year. Subject to maximum of £20m principal per banking group.

Red – At the time the deposit is made, up to 15% per counterparty for period up to 6 months. Subject to maximum of £15m per banking group.

Green – At the time the deposit is made, up to 10% per counterparty for period up to 100 days. Subject to maximum of £10m per banking group.

4 CAPITAL PLANS AND PRUDENTIAL CODE INDICATORS

4.1 Introduction:

- 4.1.1 The key objective of the Prudential Code is to provide a framework for local authority capital finance to ensure that:
 - capital expenditure plans are affordable and proportionate;
 - all external borrowing and other long term liabilities are within prudent and sustainable levels;
 - the risks associated with investments for commercial purposes are proportionate to their financial capacity, and;
 - treasury management decisions are taken in accordance with professional good practice.
- 4.1.2 The Prudential Code specifies a range of indicators that must be used, and other factors that must be taken into account. They should be evaluated as a coherent entity, because changes in any one indicator often impact on others. They must also be considered in conjunction with other annual strategic financial plans, such as the annual revenue and capital budgets. The effects that any alternative options in these budgets might have on the indicators must also be considered before approval is given to the final financial strategic plan.
- 4.1.3 Proposals in the Capital Programme form the basis for the Prudential Indicators.
- 4.1.4 A schedule of all of the Prudential Indicators is attached at 4.3, a summary of which will be included in the Medium Term Financial Plan (MTFP).

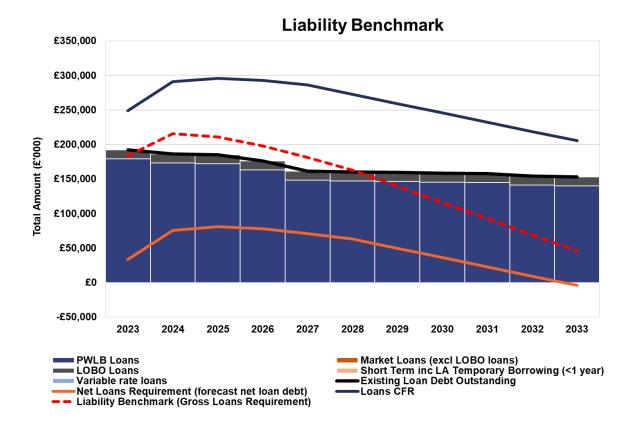
4.2 Prudential Indicators – Affordability and Capital Programme

- 4.2.1 **Affordability** These indicators are calculated to help Members assess the overall affordability of the proposed Capital Programme by providing an indication of the impact it will have on the Council's overall resources.
- 4.2.2 **Capital Programme** The Council's capital expenditure plans are a key driver to treasury management activity. This prudential indicator is a summary of the Council's draft capital expenditure plans, both those agreed previously, and those forming part of this budget cycle.
- 4.2.3 The Council's Borrowing Need Capital Financing Requirement The Council's Capital Financing Requirement (CFR) is the outstanding capital spend which has not yet been paid for from either revenue or capital resources, such as grants or property sales. It is essentially a measure of the Council's underlying need to borrow. Any capital spend which has not been paid for during the year, will increase the CFR. The CFR does not increase indefinitely,

- as the Minimum Revenue Provision (MRP) (which is a statutory annual revenue charge) makes principal repayments in line with the life cycle of the assets financed from borrowing. The Council's gross debt over the next 3 years should not, except in the short term, exceed the estimated Capital Financing Requirement for the next 3 years. Although some flexibility is permitted for limited early borrowing, officers must ensure that long term borrowing is not undertaken for revenue purposes.
- 4.2.4 Following accounting changes in 2009/10 the CFR includes any other long term liabilities (e.g. Public Private Partnerships (PPP), Private Finance Initiatives (PFI), finance leases) brought onto the balance sheet. Whilst this increases the CFR, and therefore the Council's borrowing requirement, these types of scheme include a borrowing facility and so the Council is not required to separately borrow for these schemes. The Council currently has no such schemes within the CFR.
- 4.2.5 Affordability Ratio of Financing Costs to Net Revenue Stream This indicator shows the full revenue cost of projects in the draft capital programme financed by borrowing.
- 4.2.6 Authorised Limit The Authorised Limit is the statutory limit determined under section 3(1) of the Local Government Act 2003, through which the Government retains an option to control either the total of all councils' plans, or those of a specific council, although this power has not yet been exercised. It represents a control on the absolute maximum level of borrowing and is a key control over treasury activity which ensures that, over the medium term, net borrowing will only be undertaken to finance capital spend. It is set to ensure that external borrowing doesn't exceed the Council's estimated CFR for the 3 years covered by the Medium Term Financial Plan, allowing some flexibility for limited early borrowing for future years where appropriate.
- 4.2.7 The limit reflects the level of borrowing which, while not desired, could be afforded in the short term to allow borrowing to cover for any extraordinary treasury activities. This additional headroom to borrow would be used in exceptional circumstances only.
- 4.2.8 **Limits to Borrowing Operational Boundary** This indicator sets the expected maximum amount of borrowing that would under normal circumstances be undertaken at any time during the financial year.
- 4.2.9 **Treasury Management Limits on Activity** There are three debt related treasury activity limits. Their purpose is to contain the activity of the treasury function within certain limits, thereby managing risk and reducing the impact of an adverse movement in interest rates. However, if these are set to be too restrictive they will impair the opportunities to reduce costs/improve performance.
- 4.2.10 Liability Benchmark During 2021/22 CIPFA consulted on revisions to the CIPFA TM Code and Prudential Code. The aim of the revisions is to strengthen the provisions within the Codes relating to commercial investment, focusing on sustainability and affordability, and to ensure the TM Code remains fit for purpose. The guidance issued by CIPFA requires full implementation of the revised code to be incorporated by local authorities from 2023/24. This

encompasses the inclusion of a new Treasury Management Prudential Indicator – the "Liability Benchmark" in the TMSS for 2023/24.

4.2.11 The Liability Benchmark chart is shown below.



4.3 The Council's Prudential Indicators and Treasury Management Indicators 2023/24

Prudential Indicators are determined under Section 3(1) and (2) of the Local Government Act 2003 and produced in accordance with CIPFA's Prudential Code. The Prudential Indicators to 2027/28 are detailed below.

		2023/24	2024/25	2025/26	2026/27	2027/28
	PRUDENTIAL INDICATORS - Affordability	Estimated		'		
		£m	£m	£m	£m	£m
1	Estimates of proposed capital expenditure					
	(excludes capitalisation directive and HRA)	102.003	65.209	30.170	22.962	21.638
	Estimates of proposed HRA capital expenditure	2.161	2.161	2.161	2.161	2.161
	Total	104.164	67.370	32.331	25.123	23.799
	Estimates of proposed capital expenditure funded by prudential borrowing (includes capitalisation					
	directive)	51.088	16.465	9.668	6.400	5.578
		The current		capital expendi ars to 2027/28		e forward
		£m	£m	£m	£m	£m
2	Capital Financing requirement (CFR) General Fund (includes capitalisation directive)	276.071	281.815	279.722	273.829	266.691
	Capital Financing requirement (CFR) for HRA	14.758	13.941	13.124	12.307	11.490
	Total - the borrowing need	290.829	295.756	292.846	286.136	278.181
				uirement indica ed to borrow fo		
		%	%	%	%	%
3	Ratio of Finance costs to Net Revenue Stream	4.71%	7.06%	7.34%	7.41%	7.35%
		This indicator shows the proportion of income received from grant and Council Tax that is spent on paying for the consequences of borrowing to fund capital borrowings.			0	

	PRUDENTIAL INDICATORS - Prudence	2023/24	2024/25	2025/26	2026/27	2027/28
4	Authorised limit for external debt	Proposed				
		£m	£m	£m	£m	£m
	Borrowing	318	324	322	316	309
	Other Long Term Liabilities	135	135	135	135	135
	Total	453	459	457	451	444
		The Authorised Limit and Operational Boundary are the				
		monitoring tools against which the actual external borrowing of				
		the Council will be managed. They are based on a prudent but				
		not worst case scenario and include an allowance for unusual or				
		unexpected	d cash flow m	ovements but	not catastroph	nic events.

5	Operational boundary for external debt	2023/24	2024/25	2025/26	2026/27	2027/28	
		Proposed					
		£m	£m	£m	£m	£m	
	Borrowing	293	299	297	291	284	
	Other Long Term Liabilities	125	125	125	125	125	
	Total	418	424	422	416	409	
		The Council is also requested to approve the C				rational	
		Boundaries for External Borrowing for the next five years as					
		shown. This boundary is lower than the Authorised limit because					
		it excludes	the impact o	f unusual or u	nexpected ca	sh flows.	

6	Upper Limit on Net Sums Borrowed	2023/24	2024/25	2025/26	2026/27	2027/28
		Proposed				
		£m	£m	£m	£m	£m
	Fixed Interest Rates	293	299	297	291	284
	Variable Interest Rates	100	100	100	100	100

7	Upper Limit for total principal sums invested for	Lower of £20m or 20% of the portfolio at any
	over 1 year (per maturity dates)	time during the financial year

The purpose of this indicator is to ensure that the Council has protected itself against the risk of loss arising from the need to seek early redemption of principal sums invested. Only core cash will be invested for periods greater than 1 year.

8	Maturity Structure of fixed interest rates borrowing	Upper	Lower	Opening	ng Forecast	
				01/04/23	31/03/24	
	Under 12 months	30%	0%	3.1%	0.5%	
	12 months to 2 years	40%	0%	0.5%	4.8%	
	2 years to 5 years	40%	0%	13.0%	9.1%	
	5 years to 10 years	40%	0%	3.8%	3.7%	
	10 years and above	100%	100%	79.6%	81.9%	

The maturity of borrowing is determined by the earliest date on which the lender can require payment. The indicator is designed to exercise control over the Council having large concentrations of fixed rate debt needing to be replaced at any one time.

5 MINIMUM REVENUE PROVISION (MRP) POLICY STATEMENT

- 5.1 The Council is required to pay off an element of the accumulated General Fund capital spend each year (the Capital Financing Requirement (CFR)) through a revenue charge (the minimum revenue provision MRP), although it is also allowed to undertake additional voluntary payments if required (voluntary revenue provision VRP).
- 5.2 Department for Levelling up, Housing and Communities (DLUHC) regulations the full Council to approve an MRP Statement in advance of each year. A variety of options are provided to councils, so long as there is a prudent provision.
- 5.3 The Minimum Revenue Provision (MRP) policy for 2023/24 is based on the legacy policies from sovereign Councils as detailed below.
- 5.4 The Council will undertake a review of its MRP policy during 2023/24 to develop a consolidated policy fit for purpose for the new Council. It is expected that any proposed amendments to the following policy would be approved by Council during 2023/24.
- 5.5 The Council is recommended to approve the following MRP Statement:
- 5.6 For Capital Spend incurred by Westmorland & Furness Council:
 - In the case of capital spend financed by "supported" borrowing this will be charged on a 2% straight line basis, net of "Adjustment A". This ensures that the debt will be repaid within 50 years.
 - In the case of all capital spend financed by Prudential Borrowing; this will be subject to MRP under option 3: Asset life method equal instalments charged over the estimated life of the asset. MRP will be based on the estimated life of the assets, in accordance with the regulations (this option must be applied for any expenditure capitalised under a Capitalisation Directive).

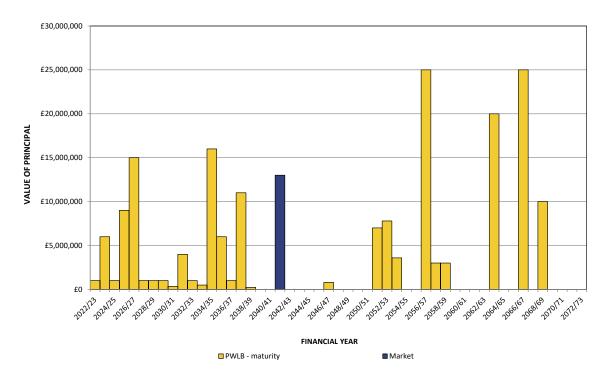
- 5.6.1 Estimated life periods will be determined under delegated powers in accordance with the Council's Accounting Policy on depreciation of assets. To the extent that expenditure is not on the creation of an asset and is of a type that is subject to estimated life periods that are referred to in the guidance, these periods will generally be adopted by the Council. However, the Council reserves the right to determine useful life periods and prudent MRP in exceptional circumstances where the recommendations of the guidance would not be appropriate.
- 5.6.2 As some types of capital expenditure incurred by the Council are not capable of being related to an individual asset, asset lives will be assessed on a basis which most reasonably reflects the anticipated period of benefit that arises from the expenditure. Also, whatever type of expenditure is involved, it will be grouped together in a manner which reflects the nature of the main component of expenditure and will only be divided up in cases where there are two or more major components with substantially different useful economic lives.
- 5.7 For Capital Spend previously incurred by Cumbria County Council:
 - In the case of capital spend incurred before 1 April 2008 and spend financed by "supported" borrowing in all the following years; from 1 April 2009 this will be charged on a 2% straight line basis, net of "Adjustment A". This ensures that the debt will be repaid within 50 years.
 - In the case of all capital spend financed by Prudential Borrowing; this will be subject to MRP under option 3: Asset life method equal instalments charged over the estimated life of the asset. MRP will be based on the estimated life of the assets, in accordance with the regulations (this option must be applied for any expenditure capitalised under a Capitalisation Directive).
 - Repayments included in annual Public, Private Partnerships (PPP),
 Public Finance Initiative (PFI) or finance leases are applied as MRP.
- 5.8 For Capital Spend previously incurred by Barrow Borough Council:
- 5.8.1 For capital expenditure incurred before 1 April 2008 or which in the future will be Supported Capital Expenditure, the MRP policy will be:
 - The MRP charge in relation to capital expenditure incurred prior to 1 April 2008 where the expenditure was funded by either supported or unsupported borrowing will be 1/50th of the balance remaining at the 31st March 2016.
- 5.8.2 From 1 April 2008 for all unsupported borrowing the MRP policy will be:
 - Asset life method MRP will be based on the estimated life of the assets, in accordance with the proposed regulations (this option must be applied for any expenditure capitalised under a Capitalisation Directive) (option 3).
- 5.8.3 These options provide for a reduction in the borrowing need over approximately the asset's life.

- 5.8.4 There is no requirement on the HRA to make a minimum revenue provision but there is a requirement for a charge for depreciation to be made (although there are Treasury Management Strategy Statement 2022-2023 transitional arrangements in place). The HRA Business Plan under self-financing includes a voluntary revenue provision to repay the debt on the account.
- 5.9 For Capital Spend previously incurred by Eden District Council:
- 5.9.1 Eden Council generally apply the asset life method to determine its minimum revenue provision. DHULC guidance suggests maximum asset lives of 40 or 50 years for property and land respectively. Any MRP will be calculated with this in mind, but the Council retains the option to use a shorter or longer period where there is evidence to support that this is reasonable and prudent.
- 5.9.2 Minimum revenue provision which arises as a result of capitalising leases or lease type arrangements will match the annual principal repayment for the associated liability.
- 5.9.3 When a loan is granted that results in capital expenditure, the Council will retain the option to treat repayments of principal as satisfying the requirement for making prudent provision, subject to assessment on a case-by-case basis.
- 5.9.4 Any MRP relating to expenditure capitalised under statute will be in line with the charge periods recommended by DHULC.
- 5.10 For Capital Spend previously incurred by South Lakeland District Council:
- 5.10.1 Within South Lakeland District Council capital expenditure incurred before 1 April 2008 or for any Supported Capital Expenditure, the MRP policy will be:
 - Previous practice MRP will follow the practice outlined in former CLG regulations (option 1); this option provides for an approximate 4% reduction in the borrowing need (CFR) each year on eligible debt.
- 5.10.2 For all unsupported borrowing after 1 April 2008 (including Private Finance Initiative and finance leases) the MRP policy will be:
 - Asset Life Method MRP will be based on the estimated life of the assets, in accordance with the proposed regulations (this option must be applied for any expenditure capitalised under a Capitalisation Directive). This option provides for a reduction in the borrowing need over approximately the asset's life. This method allows for annual payment to be calculated as equal instalments or set as an annuity (increasing payments) over the life of the asset. The exact repayment calculation will be determined on a case by case basis.
 - For Finance leases, the MRP will be calculated to match the capital repayment identified within the annual lease payments.
- 5.10.3 For assets under constructions MRP will not be applied until the earlier of entering external borrowing or when the asset comes into use. However if

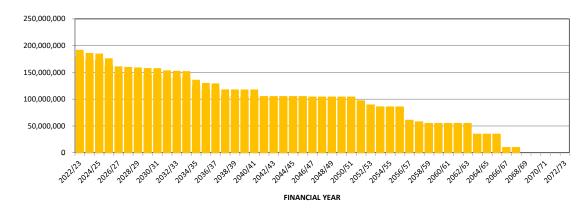
there is expected to be a significant delay between expenditure and the asset coming into use then we will consider, on a case by case basis, applying MRP sooner.

Long term borrowing (Debt Portfolio from Sovereign Councils) at 31 December 2022

Current Maturity Profile



Cumulative Debt Profile to Maturity



Note: Lender Option Borrower Options (LOBOs) are long term 'market loans' (i.e. a loan from a bank for a fixed period repaid at maturity). The interest rate in the initial periods of these loans is at a discount to the market rate. The lender has the option to change the terms, at which point the Council has the option to repay the loan early. Due to this, the loans are classed as 'variable' rate.

The LOBOs total £13m (6.7%) of the Council's total long term borrowing as at 31 December 2022.

<u>Westmorland & Furness Council debt portfolio detail from Sovereign Councils at 31 December 2022:</u>

Sovereign Council	Lender	Original Loan Start Date	Maturity Date	Repayment Type (i.e. at Maturity, Annuity etc)	Debt attributable to Westmorland & Furness Council (£1)	Interest Rate (%)
Barrow BC	PWLB	28/03/2012	28/03/2023	Maturity	£1,000,000	2.56
Cumbria CC	PWLB	04/05/1995	15/11/2023	Maturity	£5,000,000	8.50
Barrow BC	PWLB	28/03/2012	28/03/2024	Maturity	£1,000,000	2.70
Barrow BC	PWLB	28/03/2012	28/03/2025	Maturity	£1,000,000	2.82
Cumbria CC	PWLB	14/11/2001	14/11/2025	Maturity	£3,000,000	4.50
Cumbria CC	PWLB	29/05/2003	15/11/2025	Maturity	£5,000,000	4.45
Barrow BC	PWLB	28/03/2012	28/03/2026	Maturity	£1,000,000	2.92
Cumbria CC	PWLB	14/11/2001	13/11/2026	Maturity	£14,000,000	4.50
Barrow BC	PWLB	28/03/2012	28/03/2027	Maturity	£1,000,000	3.01
Barrow BC	PWLB	28/03/2012	28/03/2028	Maturity	£1,000,000	3.08
Barrow BC	PWLB	28/03/2012	28/03/2029	Maturity	£1,000,000	3.15
Barrow BC	PWLB	28/03/2012	28/03/2030	Maturity	£1,000,000	3.21
Barrow BC	PWLB	28/03/2012	28/03/2031	Maturity	£350,000	3.26
Barrow BC	PWLB	21/11/2005	01/10/2031	Maturity	£4,000,000	4.25
Barrow BC	PWLB	28/03/2012	28/03/2033	Maturity	£1,000,000	3.34
Barrow BC	PWLB	28/03/2012	28/03/2034	Maturity	£500,000	3.37
Cumbria CC	PWLB	20/12/2004	15/05/2034	Maturity	£16,000,000	4.50
Barrow BC	PWLB	24/10/2005	01/10/2035	Maturity	£6,000,000	4.45
Barrow BC	PWLB	28/03/2012	28/03/2037	Maturity	£1,000,000	3.44
Cumbria CC	PWLB	10/12/2007	15/11/2037	Maturity	£10,000,000	4.49
Barrow BC	PWLB	28/03/2012	28/03/2038	Maturity	£1,000,000	3.46
Barrow BC	PWLB	28/03/2012	28/03/2039	Maturity	£239,000	3.47
Cumbria CC	FMS Wertmanagement	25/01/2002	27/01/2042	Maturity	£13,000,000	4.73
South Lakeland DC	PWLB	25/08/2006	29/03/2047	Maturity	£800,000	4.25
Barrow BC	PWLB	07/08/2006	01/10/2051	Maturity	£4,000,000	4.35
South Lakeland DC	PWLB	04/01/2008	29/03/2052	Maturity	£3,000,000	4.42
Barrow BC	PWLB	10/10/2006	01/04/2052	Maturity	£4,794,734	4.10
South Lakeland DC	PWLB	02/08/2007	29/09/2052	Maturity	£3,000,000	4.55
Barrow BC	PWLB	12/06/2007	01/04/2053	Maturity	£3,595,000	4.75
Cumbria CC	PWLB	08/03/2007	15/05/2056	Maturity	£25,000,000	4.25
South Lakeland DC	PWLB	07/05/2008	29/03/2058	Maturity	£3,000,000	4.43
South Lakeland DC	PWLB	09/10/2008	29/09/2058	Maturity	£3,000,000	4.36
Cumbria CC	PWLB	10/06/2019	10/06/2063	Maturity	£20,000,000	2.16
Cumbria CC	PWLB	28/03/2018	28/03/2067	Maturity	£25,000,000	2.32
Cumbria CC	PWLB	31/05/2018	31/05/2068	Maturity	£10,000,000	2.25
Total:		·			£193,278,734	3.84

Note: The FMSWERTM borrowing above relates to market loans with FMS Wertmanagement Bank Germany. Initially taken from Depfa Bank Plc (Dublin) and subsequently transferred by the lender to FMS.

<u>Westmorland & Furness Council Investment Portfolio - from Sovereign</u> Councils as at 31 December 2022

The Council's investment portfolio (comprised of the investment portfolios from sovereign Councils) with the average deposit rate as at 31 December 2022 is shown below. There will be a final list confirmed from 1 April 2023.

The Council's investment strategy is to first provide security and adequate liquidity, before considering optimising investment return. The aim is for an appropriate balance of instant access, short-term investments and longer, three to twelve month deposits (earning higher rates). The Council is committed to this policy but it must be acknowledged that it lowers the potential interest rate available.

Specified Treasury Investments Complant with Westmorland & Furness Council Investment Strategy 1, 10 1								Investments
Sovereign Council Counterparty Deposit Type								
Specified Treasury Investments Compilant with Westmordand & Furness Council Investment Strategy Council (§*) Council (Sovereign Council	Countarnarty	Donosit Typo	Start Data	Maturity Data	Rate at	Dringinal (f)	
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Cumbria CC NATIONAL WESTMINSTER BANK Fixed Term Deposit 26/09/2022 27/03/2023 4.35 10,000,000 4,200,000 Cumbria CC NATIONAL WESTMINSTER BANK Fixed Term Deposit 28/10/2022 27/03/2023 3.60 5,000,000 2,100,000 Cumbria CC SANTANDER UK Fixed Term Deposit 29/09/2022 29/03/2023 4.32 5,000,000 2,100,000 Eden DC STANDARD CHARTERED BANK - SUST Fixed Term Deposit 30/09/2022 31/03/2023 4.54 5,000,000 2,100,000 Eden DC DMADF Fixed Term Deposit 13/10/2022 31/03/2023 3.49 1,275,000 1,275,000 Cumbria CC ABERDEEN CITY COUNCIL Fixed Term Deposit 08/12/2022 09/05/2023 3.48 2,500,000 1,050,000 Cumbria CC LANDESBANK HESSEN-THUR LONDON Fixed Term Deposit 13/12/2022 13/06/2023 4.02 5,000,000 2,100,000 South Lakeland DC Barrow BC Medway Council Fixed Term Deposit 29/09/2022 19/06/2023 3.25 5,000,000 3,000,000	South Lakeland DC	Coventry BS	Fixed Term Deposit	25/10/2022	24/03/2023	3.31	1,000,000	1,000,000
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Eden DC DMADF Fixed Term Deposit 13/10/2022 31/03/2023 3.49 1,275,000 1,275,000 Cumbria CC ABERDEEN CITY COUNCIL Fixed Term Deposit 08/12/2022 09/05/2023 3.48 2,500,000 1,050,000 Cumbria CC ABERDEEN CITY COUNCIL Fixed Term Deposit 08/12/2022 09/05/2023 3.48 2,500,000 1,050,000 Cumbria CC LANDESBANK HESSEN-THUR LONDON Fixed Term Deposit 13/12/2022 13/06/2023 4.02 5,000,000 2,100,000 South Lakeland DC Stockport MBC Fixed Term Deposit 20/06/2022 19/06/2023 1.25 5,000,000 5,000,000 Barrow BC West Dunbartonshire Fixed Term Deposit 29/09/2022 29/06/2023 3.90 4,000,000 3,000,000 South Lakeland DC Uttlesford District Council Fixed Term Deposit 25/10/2022 25/07/2023 3.90 4,000,000 3,000,000 South Lakeland DC Darlington BC Fixed Term Deposit 27/09/2022 26/09/2023 3.00 3,000,000 2,000,000	Cumbria CC	STANDARD CHARTERED BANK - SUST	Fixed Term Deposit	30/09/2022	30/03/2023	4.54	5,000,000	2,100,000
Cumbria CC ABERDEEN CITY COUNCIL Fixed Term Deposit 08/12/2022 09/05/2023 3.48 2,500,000 1,050,000 Cumbria CC ABERDEEN CITY COUNCIL Fixed Term Deposit 08/12/2022 09/05/2023 3.48 2,500,000 1,050,000 Cumbria CC LANDESBANK HESSEN-THUR LONDON Fixed Term Deposit 13/12/2022 13/06/2023 4.02 5,000,000 2,100,000 South Lakeland DC Stockport MBC Fixed Term Deposit 20/06/2022 19/06/2023 1.25 5,000,000 5,000,000 Barrow BC Medway Council Fixed Term Deposit 29/09/2022 29/06/2023 3.90 3,000,000 3,000,000 South Lakeland DC West Dunbartonshire Fixed Term Deposit 25/10/2022 25/07/2023 3.90 4,000,000 4,000,000 South Lakeland DC Uttlesford District Council Fixed Term Deposit 27/09/2022 12/09/2023 3.00 3,000,000 3,000,000 South Lakeland DC Landesford District Council Fixed Term Deposit 27/09/2022 26/09/2023 3.00 3,000,000 2,000,0	Eden DC	Barclays bank	Fixed Term Deposit	28/07/2022	31/03/2023	2.15	1,000,000	1,000,000
Cumbria CC ABERDEEN CITY COUNCIL Fixed Term Deposit 08/12/2022 09/05/2023 3.48 2,500,000 1,050,000 Cumbria CC LANDESBANK HESSEN-THUR LONDON Fixed Term Deposit 13/12/2022 13/06/2023 4.02 5,000,000 2,100,000 South Lakeland DC Stockport MBC Fixed Term Deposit 20/06/2022 19/06/2023 1.25 5,000,000 5,000,000 Barrow BC Medway Council Fixed Term Deposit 29/09/2022 29/06/2023 3.90 3,000,000 3,000,000 South Lakeland DC West Dunbartonshire Fixed Term Deposit 25/10/2022 25/07/2023 3.90 4,000,000 4,000,000 South Lakeland DC Uttllesford District Council Fixed Term Deposit 13/09/2022 12/09/2023 3.00 3,000,000 3,000,000 South Lakeland DC Darlington BC Fixed Term Deposit 27/09/2022 26/09/2023 3.00 2,000,000 2,000,000 Cumbria CC LANDESBANK HESSEN-THUR LONDON Fixed Term Deposit 20/12/2022 29/09/2023 4.23 5,000,000 2,100,000 <td>Eden DC</td> <td>DMADF</td> <td>Fixed Term Deposit</td> <td>13/10/2022</td> <td>31/03/2023</td> <td>3.49</td> <td>1,275,000</td> <td>1,275,000</td>	Eden DC	DMADF	Fixed Term Deposit	13/10/2022	31/03/2023	3.49	1,275,000	1,275,000
Cumbria CC LANDESBANK HESSEN-THUR LONDON Fixed Term Deposit 13/12/2022 13/06/2023 4.02 5,000,000 2,100,000 South Lakeland DC Stockport MBC Fixed Term Deposit 20/06/2022 19/06/2023 1.25 5,000,000 5,000,000 Barrow BC Medway Council Fixed Term Deposit 29/09/2022 29/06/2023 3.90 3,000,000 3,000,000 South Lakeland DC West Dunbartonshire Fixed Term Deposit 25/10/2022 25/07/2023 3.90 4,000,000 4,000,000 South Lakeland DC Uttlesford District Council Fixed Term Deposit 27/09/2022 12/09/2023 3.00 3,000,000 3,000,000 South Lakeland DC Darlington BC Fixed Term Deposit 27/09/2022 26/09/2023 3.00 2,000,000 2,000,000 Cumbria CC LANDESBANK HESSEN-THUR LONDON Fixed Term Deposit 20/12/2022 29/09/2023 4.23 5,000,000 2,000,000 Cumbria CC ABERDEEN STANDARD MMF Money Market Fund N/A N/A 3.28 8,500,000 3,570,000	Cumbria CC	ABERDEEN CITY COUNCIL	Fixed Term Deposit	08/12/2022	09/05/2023	3.48	2,500,000	1,050,000
South Lakeland DC Stockport MBC Fixed Term Deposit 20/06/2022 19/06/2023 1.25 5,000,000 5,000,000 Barrow BC Medway Council Fixed Term Deposit 29/09/2022 29/06/2023 3.90 3,000,000 3,000,000 Barrow BC West Dunbartonshire Fixed Term Deposit 25/10/2022 25/07/2023 3.90 4,000,000 4,000,000 South Lakeland DC Uttlesford District Council Fixed Term Deposit 13/09/2022 12/09/2023 3.00 3,000,000 3,000,000 South Lakeland DC Darlington BC Fixed Term Deposit 27/09/2022 26/09/2023 3.00 2,000,000 2,000,000 Cumbria CC LANDESBANK HESSEN-THUR LONDON Fixed Term Deposit 20/12/2022 29/09/2023 3.00 2,000,000 2,000,000 Cumbria CC LABERDEEN STANDARD MMF Money Market Fund N/A N/A 3.28 8,500,000 3,570,000 Cumbria CC BNP PARIBAS MMF INSTICASH Money Market Fund N/A N/A 3.45 18,300,000 7,686,000 Cumbria	Cumbria CC	ABERDEEN CITY COUNCIL	Fixed Term Deposit	08/12/2022	09/05/2023	3.48	2,500,000	1,050,000
Barrow BC Medway Council Fixed Term Deposit 29/09/2022 29/06/2023 3.90 3,000,000 3,000,000 Barrow BC West Dunbartonshire Fixed Term Deposit 25/10/2022 25/07/2023 3.90 4,000,000 4,000,000 South Lakeland DC Uttlesford District Council Fixed Term Deposit 13/09/2022 12/09/2023 3.00 3,000,000 3,000,000 South Lakeland DC Darlington BC Fixed Term Deposit 27/09/2022 26/09/2023 3.00 2,000,000 2,000,000 Cumbria CC LANDESBANK HESSEN-THUR LONDON Fixed Term Deposit 20/12/2022 29/09/2023 4.23 5,000,000 2,100,000 Cumbria CC ABERDEEN STANDARD MMF Money Market Fund N/A N/A 3.28 8,500,000 3,570,000 Cumbria CC BNP PARIBAS MMF INSTICASH Money Market Fund N/A N/A 3.45 18,300,000 7,686,000 Cumbria CC DEUTSCHE MMF MANAGED STERLING Money Market Fund N/A N/A 3.19 15,500,000 6,510,000 Eden DC	Cumbria CC	LANDESBANK HESSEN-THUR LONDON	Fixed Term Deposit	13/12/2022	13/06/2023	4.02	5,000,000	2,100,000
Barrow BC West Dunbartonshire Fixed Term Deposit 25/10/2022 25/07/2023 3.90 4,000,000 4,000,000 South Lakeland DC Uttlesford District Council Fixed Term Deposit 13/09/2022 12/09/2023 3.00 3,000,000 3,000,000 South Lakeland DC Darlington BC Fixed Term Deposit 27/09/2022 26/09/2023 3.00 2,000,000 2,000,000 Cumbria CC LANDESBANK HESSEN-THUR LONDON Fixed Term Deposit 20/12/2022 29/09/2023 4.23 5,000,000 2,100,000 Cumbria CC ABERDEEN STANDARD MMF Money Market Fund N/A N/A 3.28 8,500,000 3,570,000 Cumbria CC BNP PARIBAS MMF INSTICASH Money Market Fund N/A N/A 3.45 18,300,000 7,686,000 Cumbria CC DEUTSCHE MMF MANAGED STERLING Money Market Fund N/A N/A 3.19 15,500,000 6,510,000 Eden DC Royal London Enhanced Cash Plus Fund Not Set 1.80 970,629 970,629 South Lakeland DC CCLA Money M	South Lakeland DC	Stockport MBC	Fixed Term Deposit	20/06/2022	19/06/2023	1.25	5,000,000	5,000,000
South Lakeland DC Uttlesford District Council Fixed Term Deposit 13/09/2022 12/09/2023 3.00 3,000,000 3,000,000 South Lakeland DC Darlington BC Fixed Term Deposit 27/09/2022 26/09/2023 3.00 2,000,000 2,000,000 Cumbria CC LANDESBANK HESSEN-THUR LONDON Fixed Term Deposit 20/12/2022 29/09/2023 4.23 5,000,000 2,100,000 Cumbria CC ABERDEEN STANDARD MMF Money Market Fund N/A N/A 3.28 8,500,000 3,570,000 Cumbria CC BNP PARIBAS MMF INSTICASH Money Market Fund N/A N/A 3.45 18,300,000 7,686,000 Cumbria CC DEUTSCHE MMF MANAGED STERLING Money Market Fund N/A N/A 3.19 15,500,000 6,510,000 Eden DC Royal London Enhanced Cash Plus Fund N/A N/A 3.19 15,500,000 6,510,000 Eden DC Payden & Rygel Sterling Reserve Fund Sterling Reserve Fund Not Set 2.24 971,219 971,219 971,219 971,219 970,000 <	Barrow BC	Medway Council	Fixed Term Deposit	29/09/2022	29/06/2023	3.90	3,000,000	3,000,000
South Lakeland DC Darlington BC Fixed Term Deposit 27/09/2022 26/09/2023 3.00 2,000,000 2,000,000 Cumbria CC LANDESBANK HESSEN-THUR LONDON Fixed Term Deposit 20/12/2022 29/09/2023 4.23 5,000,000 2,100,000 Cumbria CC ABERDEEN STANDARD MMF Money Market Fund N/A N/A 3.28 8,500,000 3,570,000 Cumbria CC BNP PARIBAS MMF INSTICASH Money Market Fund N/A N/A 3.45 18,300,000 7,686,000 Cumbria CC DEUTSCHE MMF MANAGED STERLING Money Market Fund N/A N/A 3.19 15,500,000 6,510,000 Eden DC Royal London Enhanced Cash Plus Fund Enhanced Cash Plus Fund Not Set 1.80 970,629 970,629 Eden DC Payden & Rygel Sterling Reserve Fund Sterling Reserve Fund Not Set 2.24 971,219 971,219 South Lakeland DC CCLA Money Market Fund 3.31 7,000,000 4,250,000 South Lakeland DC Federated Money Market Fund 3.26 9	Barrow BC	West Dunbartonshire	Fixed Term Deposit	25/10/2022	25/07/2023	3.90	4,000,000	4,000,000
South Lakeland DC Darlington BC Fixed Term Deposit 27/09/2022 26/09/2023 3.00 2,000,000 2,000,000 Cumbria CC LANDESBANK HESSEN-THUR LONDON Fixed Term Deposit 20/12/2022 29/09/2023 4.23 5,000,000 2,100,000 Cumbria CC ABERDEEN STANDARD MMF Money Market Fund N/A N/A 3.28 8,500,000 3,570,000 Cumbria CC BNP PARIBAS MMF INSTICASH Money Market Fund N/A N/A 3.45 18,300,000 7,686,000 Cumbria CC DEUTSCHE MMF MANAGED STERLING Money Market Fund N/A N/A 3.19 15,500,000 6,510,000 Eden DC Royal London Enhanced Cash Plus Fund Enhanced Cash Plus Fund Not Set 1.80 970,629 970,629 Eden DC Payden & Rygel Sterling Reserve Fund Sterling Reserve Fund Not Set 2.24 971,219 971,219 South Lakeland DC CCLA Money Market Fund 3.31 7,000,000 4,250,000 South Lakeland DC Federated Money Market Fund 3.26 9	South Lakeland DC	Uttlesford District Council	Fixed Term Deposit	13/09/2022	12/09/2023	3.00	3,000,000	3,000,000
Cumbria CC LANDESBANK HESSEN-THUR LONDON Fixed Term Deposit 20/12/2022 29/09/2023 4.23 5,000,000 2,100,000 Cumbria CC ABERDEEN STANDARD MMF Money Market Fund N/A N/A 3.28 8,500,000 3,570,000 Cumbria CC BNP PARIBAS MMF INSTICASH Money Market Fund N/A N/A 3.45 18,300,000 7,686,000 Cumbria CC DEUTSCHE MMF MANAGED STERLING Money Market Fund N/A N/A 3.19 15,500,000 6,510,000 Eden DC Royal London Enhanced Cash Plus Fund Enhanced Cash Plus Fund Not Set 1.80 970,629 970,629 Eden DC Payden & Rygel Sterling Reserve Fund Sterling Reserve Fund Not Set 2.24 971,219 971,219 South Lakeland DC CCLA Money Market Fund 3.31 7,000,000 7,000,000 South Lakeland DC Federated Money Market Fund 3.21 4,250,000 9,150,000	South Lakeland DC		Fixed Term Deposit	27/09/2022	26/09/2023	3.00	2,000,000	2,000,000
Cumbria CC ABERDEEN STANDARD MMF Money Market Fund N/A N/A 3.28 8,500,000 3,570,000 Cumbria CC BNP PARIBAS MMF INSTICASH Money Market Fund N/A N/A 3.45 18,300,000 7,686,000 Cumbria CC DEUTSCHE MMF MANAGED STERLING Money Market Fund N/A N/A 3.19 15,500,000 6,510,000 Eden DC Royal London Enhanced Cash Plus Fund Enhanced Cash Plus Fund Not Set 1.80 970,629 970,629 Eden DC Payden & Rygel Sterling Reserve Fund Sterling Reserve Fund Not Set 2.24 971,219 971,219 South Lakeland DC CCLA Money Market Fund 3.31 7,000,000 7,000,000 South Lakeland DC Blackrock Money Market Fund 3.21 4,250,000 4,250,000 South Lakeland DC Federated Money Market Fund 3.26 9,150,000 9,150,000						4.23		2,100,000
Cumbria CC BNP PARIBAS MMF INSTICASH Money Market Fund N/A N/A 3.45 18,300,000 7,686,000 Cumbria CC DEUTSCHE MMF MANAGED STERLING Money Market Fund N/A N/A 3.19 15,500,000 6,510,000 Eden DC Royal London Enhanced Cash Plus Fund Enhanced Cash Plus Fund Not Set 1.80 970,629 970,629 Eden DC Payden & Rygel Sterling Reserve Fund Sterling Reserve Fund Not Set 2.24 971,219 971,219 South Lakeland DC CCLA Money Market Fund 3.31 7,000,000 7,000,000 South Lakeland DC Blackrock Money Market Fund 3.21 4,250,000 4,250,000 South Lakeland DC Federated Money Market Fund 3.26 9,150,000 9,150,000	Cumbria CC	ABERDEEN STANDARD MMF		N/A	N/A	3.28	8.500.000	3.570.000
Cumbria CC DEUTSCHE MMF MANAGED STERLING Money Market Fund N/A N/A 3.19 15,500,000 6,510,000 Eden DC Royal London Enhanced Cash Plus Fund Enhanced Cash Plus Fund Not Set 1.80 970,629 970,629 Eden DC Payden & Rygel Sterling Reserve Fund Sterling Reserve Fund Not Set 2.24 971,219 971,219 South Lakeland DC CCLA Money Market Fund 3.31 7,000,000 7,000,000 South Lakeland DC Blackrock Money Market Fund 3.21 4,250,000 4,250,000 South Lakeland DC Federated Money Market Fund 3.26 9,150,000 9,150,000	Cumbria CC		•	-				
Eden DCRoyal London Enhanced Cash Plus FundEnhanced Cash Plus FundNot Set1.80970,629970,629Eden DCPayden & Rygel Sterling Reserve FundSterling Reserve FundNot Set2.24971,219971,219South Lakeland DCCCLAMoney Market Fund3.317,000,0007,000,000South Lakeland DCBlackrockMoney Market Fund3.214,250,0004,250,000South Lakeland DCFederatedMoney Market Fund3.269,150,0009,150,000	Cumbria CC		,	•				
Eden DC Payden & Rygel Sterling Reserve Fund Sterling Reserve Fund Not Set 2.24 971,219 971,219 South Lakeland DC CCLA Money Market Fund 3.31 7,000,000 7,000,000 South Lakeland DC Blackrock Money Market Fund 3.21 4,250,000 4,250,000 South Lakeland DC Federated Money Market Fund 3.26 9,150,000 9,150,000	Eden DC		•	,				
South Lakeland DC CCLA Money Market Fund 3.31 7,000,000 7,000,000 South Lakeland DC Blackrock Money Market Fund 3.21 4,250,000 4,250,000 South Lakeland DC Federated Money Market Fund 3.26 9,150,000 9,150,000		· '					· · · · · · · · · · · · · · · · · · ·	
South Lakeland DC Blackrock Money Market Fund 3.21 4,250,000 4,250,000 South Lakeland DC Federated Money Market Fund 3.26 9,150,000 9,150,000	South Lakeland DC	, , , ,					,	,
South Lakeland DC Federated Money Market Fund 3.26 9,150,000 9,150,000			•					
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	a a La . Ciarra DC					5.20	3,130,000	

Sovereign Council Counterparty		Deposit Type	Start Date	Maturity Date	Interest Rate at 31/12/22 (%)	Principal (£)	Investments attributable to Westmorland & Furness Council (£)*
Specified Treasury	Investments Non-Compliant with West	morland & Furness Council Ir	vestment Strat	tegy			
Barrow BC	Cambridge Building Society	Fixed Term Deposit	24/06/2022	04/01/2023	1.85	2,000,000	2,000,000
South Lakeland DC	Newcastle BS	Fixed Term Deposit	05/07/2022	05/01/2023	1.78	2,000,000	2,000,000
Barrow BC	Monmouthshire Building Society	Fixed Term Deposit	26/01/2022	25/01/2023	0.65	2,000,000	2,000,000
Barrow BC	Monmouthshire Building Society	Fixed Term Deposit	07/02/2022	06/02/2023	0.98	2,000,000	2,000,000
Barrow BC	National Counties Building Society	Fixed Term Deposit	24/06/2022	24/03/2023	2.20	2,000,000	2,000,000
Barrow BC	Mansfield Building Society	Fixed Term Deposit	05/12/2022	30/03/2023	3.30	2,000,000	2,000,000
Barrow BC	Principality Builidng Society	Fixed Term Deposit	15/06/2022	14/06/2023	2.00	1,000,000	1,000,000
Barrow BC	Progressive Building Society	Fixed Term Deposit	20/09/2022	20/06/2023	3.15	3,000,000	3,000,000
Barrow BC	Mansfield Building Society	Fixed Term Deposit	21/12/2022	21/06/2023	3.90	2,000,000	2,000,000
Barrow BC	Cambridge Building Society	Fixed Term Deposit	23/09/2022	23/06/2023	3.30	2,000,000	2,000,000
Barrow BC	Newcastle Building Society	Fixed Term Deposit	23/09/2022	23/06/2023	3.30	2,000,000	2,000,000
Barrow BC	National Counties Building Society	Fixed Term Deposit	20/10/2022	20/07/2023	3.85	2,000,000	2,000,000
Barrow BC	Furness Building Society	Fixed Term Deposit	22/07/2022	21/07/2023	2.50	2,000,000	2,000,000
Barrow BC	Saffron Building Society	Fixed Term Deposit	13/09/2022	12/09/2023	3.35	1,000,000	1,000,000
Barrow BC	Newcastle Building Society	Fixed Term Deposit	12/10/2022	11/10/2023	4.45	2,000,000	2,000,000
Barrow BC	Saffron Building Society	Fixed Term Deposit	14/12/2022	13/12/2023	4.18	3,000,000	3,000,000
							32,000,000
Non Specified Inves	stments						
Eden DC	CCLA Diversified Income Fund	Diversified Income fund		Not Set	2.48	917,792	917,792
Eden DC	CCLA LAMIT	LAMIT Fund		Not Set	5.50	4,173,965	4,173,965
							5,091,756
Total Treasury Inve	estments at 31 December 2022				3.09		158,634,604
Non Treasury Inves	stments						
Eden DC	AHIF Eden HA Lonsdale Ct	Reducing Balance	05/06/2017	02/06/2042	4.50	108,592	108,592
Eden DC	AHIF Eden HA Brent Rd	Reducing Balance	31/01/2018	31/01/2043	4.50	158,103	158,103
Eden DC	AHIF Eden HA Lonsdale Ct	Reducing Balance	29/03/2018	29/03/2043	4.50	275,520	275,520
Eden DC	Heart of Cumbria Ltd	Loans	Various	26/06/2049		2,567,000	2,567,000
Eden DC	Enterprise Answers	Loans	19/03/2015			250,000	250,000
Eden DC	Heart of Cumbria Ltd	Share capital				1,000,000	1,000,000
Total Non Treasury	Investments:						4,359,215

^{*} Cumbria County Council investments as at 31 December 2022 have been allocated as 43% to Westmorland & Furness Council; 52% to Cumberland Council; and 5% to Cumbria Commissioner Fire & Rescue Service.