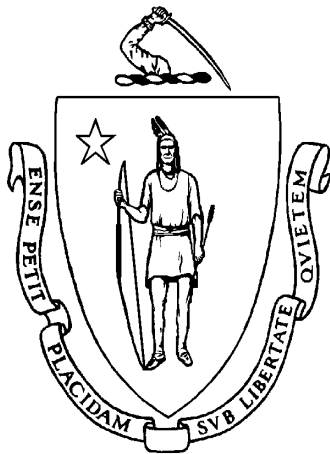


THE COMMONWEALTH OF MASSACHUSETTS
DIVISION OF BANKS

LIST OF LEGAL INVESTMENTS



Pursuant to

GENERAL LAWS

CHAPTER 167

SECTION 15A

As of July 1, 2025

**Mary L. Gallagher
Commissioner of Banks**

LIST OF LEGAL INVESTMENTS

July 2025

This Legal List of Investments (List) is prepared as of July 1, 2025. Investors are advised to take note of changes to individual investments on this List that occur after this date.

The following is a list of and related provisions regarding stocks, bonds, notes, railroad equipment trust certificates, and other interest-bearing obligations which, in the opinion of the Division of Banks (Division), are now legal investments under the provisions of Massachusetts General Laws chapter 167, sections 15A-15K, inclusive.

As used throughout this document and in G.L. c. 167, sections 15A-15K, inclusive, the terms “legal list” and “legal investments” shall mean the list of securities approved for investment by the Commissioner of Banks (Commissioner).

An entity issuing stocks, bonds, notes, or other interest-bearing obligations shall apply directly to the Commissioner and identify itself as being eligible for possible inclusion on the List under sections 15E to 15K of G.L. c. 167, provided, however, that investments governed by said section 15B must follow the process for inclusion on the List set out in that statute.

Approval of any security by the Commissioner for addition to or inclusion in the List should not in any way be construed as a recommendation by the Division for investment. Each investor has the responsibility of evaluating the merits of a particular investment for the individual institution as well as determining whether that investment meets the investor's financial objectives.

For more information contact: dob.dis@mass.gov

FEDERAL, STATE, AND INTERNATIONAL OBLIGATIONS

Statutory Requirements: (G.L. c. 167, s. 15C)

An entity that may invest pursuant to section 15A or the legal list may invest in bonds, notes, or other interest-bearing obligations of the following classes:

1. United States: Direct obligations of the United States or in obligations that are unconditionally guaranteed as to the payment of principal and interest by the United States.
2. Massachusetts: Legally issued, assumed, or unconditionally guaranteed bonds, notes, or other interest-bearing obligations of this Commonwealth, including legally issued bonds, notes, or other indebtedness of an entity established as a public instrumentality by general or special law.
3. Other States: Legally issued, assumed, or unconditionally guaranteed bonds, notes, or other interest-bearing obligations of any state of the United States other than this Commonwealth, which has not, within the 20 years prior to the making of such investment, defaulted for a period of more than 120 days in the payment of any part of either principal or interest of any legally issued or assumed obligation; provided that the full faith and credit of such state shall be pledged for the payment of the principal and interest of such obligations.
4. Canada: Bonds, notes, or other obligations issued, or guaranteed as to both principal and interest, by the Dominion of Canada or any of its provinces; provided (a) that such bonds, notes, or obligations shall be payable in United States funds either unconditionally or at the option of the holder of the bonds, notes, or other obligations; and (b) that at the date of investment the Dominion of Canada or the applicable province shall not have been in default in the payment of interest or principal of any of its obligations for a period in excess of 31 days at any time within the 20 years preceding such date of investment. Not more than 5% of the assets of an entity authorized to invest pursuant to section 15A or the legal list may be invested in obligations authorized under this paragraph.
5. Other International Obligations: Bonds, notes, or obligations issued, assumed, or guaranteed by the International Bank for Reconstruction and Development, the Inter-American Development Bank, or the Asian Development Bank containing an unconditional promise to pay, or an unconditional guarantee of the payment of, the interest on the bonds, notes, or obligations regularly and the principal of the bonds, notes, or obligations by a specified date, in United States currency; provided that not more than 3% of the assets of an entity authorized to invest pursuant to section 15A or the legal list shall be invested in such bonds, notes, or obligations; and provided, further, that the Commissioner may at any time on his or her own initiative suspend the authorization granted by this clause for periods as the Commissioner may determine.
6. Federal Agency Obligations:
 - (a) Obligations of, or instruments issued by, and fully guaranteed as to principal and interest by the Federal National Mortgage Association, established under the federal National Housing Act, 12 U.S.C. 1715 et seq., as amended;

- (b) Debentures, bonds, or other obligations issued by any Federal Home Loan Bank or consolidated Federal Home Loan Bank debentures or bonds issued by the Federal Home Loan Bank Board under the Federal Home Loan Bank Act, 12 U.S.C. 1421 et seq., as amended;
- (c) Debentures issued by the Central Bank for Cooperatives or consolidated debentures issued by said central bank and the 12 regional banks for cooperatives under the Farm Credit Act, as amended;
- (d) Collateral trust debentures or other similar obligations issued by any federal intermediate credit bank or consolidated debentures or other similar obligations issued by the federal intermediate credit banks under the Federal Farm Loan Act, as amended;
- (e) Farm loan bonds issued by any federal land bank under the Federal Farm Loan Act, as amended;
- (f) Promissory notes representing domestic farm labor housing loans authorized under federal law when the notes are fully guaranteed as to principal and interest by the Farmers Home Administration of the United States Department of Agriculture;
- (g) Bonds, notes, or obligations issued, assumed, or guaranteed by the Export Import Bank of the United -States;
- (h) Obligations of any person, including any form of mortgage-backed- security, as to which the payment of principal and interest according to the terms of such obligations shall be guaranteed by the Government National Mortgage Association under the provisions of the National Housing Act, as amended;
- (i) Certificates issued by the Federal Home Loan Mortgage Corporation representing interests in mortgage loans made, acquired or participated in by said Federal Home Loan Mortgage Corporation;
- (j) System-wide obligations issued under the provisions of the Farm Credit Act, as amended, by the institutions included in the federal farm credit system.

MUNICIPAL OBLIGATIONS

Statutory Requirements: (G.L. c. 167, s. 15D)

An entity authorized to invest pursuant to section 15A or the legal list may invest in bonds, notes, or other interest-bearing obligations of the following classes:

1. Massachusetts: Legally issued or assumed bonds, notes, or other interest-bearing obligations of a county, city, town, or legally established district of this Commonwealth.
2. Other States: Legally issued or assumed bonds, notes, or other interest -bearing obligations of a county, city, town, or legally established district outside of the Commonwealth; provided, however, that this clause shall not authorize investments in obligations of any city or town outside of the Commonwealth

which have been in default for more than 120 days in the payment of any part of principal and interest of all bonds, notes, or other interest-bearing obligations legal for investment under this section.

3. Full Faith and Credit Requirement: The full faith and credit of the county, city, town, or district shall be pledged for the full payment of principal and interest of all bonds, notes, or other interest-bearing obligations legal for investment under any provision of this section.

RAILROAD OBLIGATIONS

Statutory Requirements: (G.L. c. 167, s. 15E)

Bonds, notes, or other interest-bearing obligations of railroad corporations subject to the conditions, limitations, and requirements of section 15E.

Not more than 20% of the assets of the entity shall be invested in the railroad obligations.

RAILROAD EQUIPMENT OBLIGATIONS AND TRUST CERTIFICATES

Investments in railroad equipment obligations shall be those of, or guaranteed by, a railroad incorporated in the United States or any state and which is doing business principally within the United States.

The outstanding Philadelphia Plan Equipment Trust Certificates of the following companies are legal.

Burlington Northern Santa Fe
Norfolk Southern Railway Company
Union Pacific Railroad Company

TELEPHONE COMPANY OBLIGATIONS

Statutory Requirements: (G.L. c. 167, s. 15F)

Bonds, notes, or other obligations of telephone companies subject to the conditions, limitations, and statutory requirements of section 15F.

Not more than 20% of the assets of the entity shall be invested in the bonds of telephone companies.

All outstanding issues, which meet statutory requirements, of the following companies:

AT&T Inc.¹
Indiana Bell Telephone Company
Verizon Communications Inc.

¹ SBC Communications completed the acquisition of AT&T Corporation on November 21, 2005. Following the acquisition, SBC adopted AT&T Inc. as its name.

Holders of obligations of companies affected by the mergers or acquisitions noted below should contact the appropriate service representative office of the company for further direction:

- (1) The merger of Bell Atlantic and GTE was finalized on June 30, 2000, under the new name of Verizon Communications.
- (2) SBC Communications completed the acquisition of Ameritech Corporation on October 8, 1999.
- (3) SBC Communications completed the acquisition of AT&T Corporation on November 21, 2005. See the first numbered footnote.
- (4) AT&T, Inc. completed the acquisition of Bell South Corporation on December 29, 2006.
- (5) CenturyTel, Inc., and EMBARQ merged on July 1, 2009, to become CenturyLink, Inc.
- (6) Frontier Communications Corporation acquired Verizon Communications, Inc. local exchange businesses in fourteen states effective July 1, 2010.

GAS, ELECTRIC LIGHT, AND WATER OBLIGATIONS

Statutory Requirements: (G.L. c. 167, s. 15G)

A. Massachusetts Companies

Bonds, notes, or other interest-bearing obligations of a gas, electric light, or water company incorporated or doing business in this Commonwealth and subject to the control and supervision of the Commonwealth.

B. Other Companies

Bonds of any company which at the time of the investment is incorporated under the laws of the United States or any state and transacting the business of supplying electrical energy or artificial gas or natural gas purchased from another company and supplied in substitution for or in mixture with artificial gas for light, heat, power, and other purposes or transacting any or all of the business. The bonds shall be part of an original issue of not less than \$25,000,000 in principal amount.

C. Investment Limitations

Not more than 25% of the assets of the entity shall be invested in obligations under this section and no more than 4% shall be invested in the obligations of any 1 company.

AEP Texas Central Company (formerly Central Power & Light Company)
Allete (formerly Minnesota Power and Light)
Alliant Energy (formerly Interstate Power Company)
Atlantic City Electric Company
Delmarva Power & Light Company
Duke Energy Corporation
Empire District Electric Company
Eversource Energy
Florida Power & Light Company
Florida Power Corporation (d/b/a Duke Energy Florida, Inc.)
Gulf Power Company

Hawaiian Electric Company
Idaho Power Company
Kentucky Utilities Company
Louisville Gas and Electric Company
Madison Gas & Electric Company (formerly MGE Energy)
Narragansett Electric Company
New England Power Company
Northern States Power Company (Minnesota)
Northern States Power Company (Wisconsin)
OGE Energy (formerly Oklahoma Gas and Electric Company)
Potomac Electric Power Company
PPL Electric Utilities Corporation (formerly Pennsylvania Power & Light Company)
Public Service Company of Oklahoma
Public Service Electric & Gas Company
Southern Indiana Gas & Electric Company
Southwestern Electric Power Company
Southwestern Public Service Company
Virginia Electric & Power Company
Wisconsin Electric Power Company
Wisconsin Power & Light Company
Wisconsin Public Service Corporation

STOCK OF BANKS AND BANK HOLDING COMPANIES

Statutory Requirements: (G.L. c. 167, ss. 15H and 15I)

An entity that may invest pursuant to section 15A or the legal list may invest in the common stock of:

- (i) a bank in stock form incorporated under the laws of and doing business within the Commonwealth; provided, however, that there shall be no preferred stock outstanding; or, in the common stock of a federally-chartered bank in stock form doing business within the Commonwealth; provided, however that there shall be no preferred stock outstanding; provided further, that state-chartered or federally-chartered banks shall be well capitalized under bank regulatory criteria;
- (ii) a state-chartered bank or federally-chartered bank doing business anywhere within the United States, which is a member of the Federal Reserve System and is well capitalized under bank regulatory criteria;
- (iii) a bank holding company as defined in chapter 167A; provided, however, that the stock shall be received pursuant to an offer made by the bank holding company to exchange shares of its common stock for shares of a bank in stock form incorporated under the laws of the Commonwealth or for shares of a federally-chartered bank doing business in the Commonwealth; or provided, however, that the stock shall be received pursuant to a plan for the merger or consolidation of the bank with or into or the transfer, sale, or exchange of property or of assets of the bank or with a bank in stock form incorporated under the laws of the Commonwealth or a federally-chartered bank doing business in the Commonwealth the stock of the bank, as the case may be, shall be at the time owned by the bank holding company.

(iv) a bank holding company as defined in said chapter 167A acquired otherwise than as set forth in the first paragraph or in the common stock of a bank holding company as defined in the federal Bank Holding Company Act of 1956, 12 U.S.C. 1841 et seq.; provided, however, that the holding company shall own 80% or more of the voting stock of the qualifying bank; provided further, that if at any time after an investment in the common stock of the bank holding company, no bank of the holding company shall meet the requirements of clauses (iii) or (iv), the holding company's stock shall be disposed of within the reasonable time as the Commissioner shall determine; and

(v) a company as defined in chapter 167A or in said federal Bank Holding Company Act of 1956; provided, however, that the banking institution or bank represents at least 50% of the company's assets at book value at the end of its fiscal year immediately preceding the date of investment or at the date of investment in the case of a newly formed company.

(vi) in the purchase of the whole or any part of the stock of a savings bank, co-operative bank, federal savings and loan association, or federal savings bank; provided, however, that the bank or association shall be well capitalized under bank regulatory criteria.

INSURANCE COMPANY STOCKS

Statutory Requirements: (G.L. c. 167, s. 15J)

An entity that may invest pursuant to section 15A or the legal list may invest in the capital stock of any insurance company that may conduct a fire and casualty insurance business; provided, however, that no insurance stock shall be purchased if the cost of the insurance stock added to the cost of the insurance stocks and bank stocks already owned shall exceed 66⅔% of the total of the assets of the entity.

BANK DEBENTURES AND NOTES

Statutory Requirements: (G.L. c. 167, s. 15K)

An entity that may invest pursuant to section 15A or the legal list may invest in the securities of any of the following classes: debentures, convertible debentures, notes, or other evidences of indebtedness of a banking corporation in the common stock of which the corporation may invest pursuant to paragraph 1 of section 15H; provided, however, that the entity that may invest pursuant to said section 15A or the legal list shall be well capitalized under regulatory criteria; or of a banking corporation in the common stock of which the corporation may invest pursuant to paragraph 2 of said section 15H shall be well capitalized under regulatory criteria.

OTHER OBLIGATIONS

Statutory Requirements: (G.L. c. 167, s. 15B(b)(i))

Pursuant to G.L. c. 167, s. 15B(g), not more than 10% of the assets of the entity shall be invested in investments authorized under this section.*

Massachusetts Bay Transportation Authority: Various Issues²
Massachusetts Port Authority: Various Issues
Massachusetts Turnpike Authority: Various Issues³
Tennessee Valley Authority: Various Issues
Washington D.C. Metropolitan Area Transit Authority: Various Issues

* Please note that this 10% limitation contained in subsection 15B(g) is an aggregate amount applying to *all* investments made pursuant to G.L. c. 167, s. 15B(a)-(f).

COMMON AND PREFERRED STOCKS

Statutory Requirements: (G.L. c. 167, s. 15B(b)(iii))

Pursuant to G.L. c. 167, s. 15B(g), not more than 10% of the assets of the entity shall be invested in investments authorized under this section.*

Abbott Laboratories
Altria Group (formerly Philip Morris Companies)
American International Group, Inc.
Bank of America Corporation
Bristol Myers Squibb Company
Coca-Cola Company
Consolidated Edison
Eli Lilly & Company
Emerson Electric Company
General Electric Company
General Mills, Inc.
Hewlett-Packard Company
Johnson & Johnson
Kimberly-Clark Corporation
McDonald's Corporation
Merck & Co., Inc. (merged with Schering-Plough Corporation)
PepsiCo, Inc.
Pfizer, Inc.
Procter & Gamble Company
Rockwell Automation (formerly Rockwell International Corporation)
Southern Company
Unilever plc

* Please note that this 10% limitation contained in subsection 15B(g) is an aggregate amount applying to *all* investments made pursuant to G.L. c. 167, s. 15B(a)-(f).

INVESTMENT FUNDS

² Massachusetts transportation agencies, including the Massachusetts Bay Transportation Authority, were integrated into the Massachusetts Department of Transportation effective November 1, 2009.

³ Massachusetts transportation agencies, including the Massachusetts Turnpike Authority, were integrated into the Massachusetts Department of Transportation effective November 1, 2009.

As provided under General Laws chapter 167, section 15A(b), such list shall include the name of any investment fund, approved by the Commissioner, which invests only in such stocks, bonds, notes, and other interest-bearing obligations which are legal investments as provided herein. The shares of any such investment fund so approved shall be legal investments pursuant to this section to the same extent as any such stocks, bonds, notes, and other interest-bearing obligations.

BLACKROCK/iSHARES EXCHANGE TRADED FUNDS:

iShares U.S. Treasury Bond ETF
iShares Treasury Floating Rate Bond ETF
iShares Short Treasury Bond ETF
iShares 1-3 Year Treasury Bond ETF
iShares 3-7 Year Treasury Bond ETF
iShares 7-10 Year Treasury Bond ETF
iShares 10-20 Year Treasury Bond ETF
iShares 20 Year+ Treasury Bond ETF
iShares Agency Bond ETF
iShares TIPS Bond ETF
iShares 0-5 Year TIPS Bond ETF
iShares GNMA Bond ETF
iShares MBS ETF

BLACKROCK INC.:

BLF T-Fund
BlackRock Impact Mortgage Fund (formerly U.S. Government Bond Fund)

DREYFUS:

Dreyfus Government Cash Management
Dreyfus Treasury Obligations Cash Management
Dreyfus Treasury Securities Cash Management(formerly Treasury Prime Cash Management)

FEDERATED INVESTORS FUNDS:

Federated Hermes Government Income Fund (formerly Federated Government Income Trust)

Federated Hermes Government Ultrashort Fund (formerly Federated Government Ultrashort Duration Fund)

Federated Hermes Short-Intermediate Government Fund (formerly Federated U.S. Government Securities Fund: 2-5 yrs.)

FIDELITY:

Fidelity Investments Money Market Treasury Portfolio - Class I

Fidelity Treasury Only Money Market Fund

Fidelity Short-Term Treasury Bond Index Fund

FIRST AMERICAN FUNDS:

First American Government Obligations Fund (Class Y and Z shares)

First American Treasury Obligations Fund (Class Y and Z shares)

First American U.S. Treasury Money Market Fund (Class Y and Z shares)

FRANKLIN TEMPLETON

Franklin Short Duration U.S. Government ETF

RBC:

RBC US Government Money Market Fund: Institutional Classes 1 and 2

TRANSWESTERN CAPITAL:

Institutional Short Duration Government Bond Fund

TRUST FOR CREDIT UNIONS:

Ultra Short Duration Portfolio

Short Duration Portfolio

UBS GLOBAL ASSET MANAGEMENT:

UBS Select Treasury Institutional Fund

VICTORY CAPITAL FUNDS:

Victory Fund for Income (Class I)

WISDOMTREE:

Floating Rate Treasury Fund