

OMERS' Modern Slavery statement for the financial year ending 31 December 2022

Our Business

The OMERS Primary Pension Plan is one of Canada's largest jointly-sponsored, multi-employer defined benefit pension plans with over 1,000 participating employers ranging from large cities to local agencies and over half a million active, deferred and retired members including union and non-union employees of municipalities, school boards, local boards, transit systems, electrical utilities, emergency services and children's aid societies across Ontario.

OMERS Administration Corporation ("AC") is a statutory corporation without share capital continued pursuant to the *Ontario Municipal Employees Retirement System Act, 2006*. AC is the administrator of the OMERS Primary Pension Plan and trustee of the pension funds.

Certain AC subsidiaries, affiliates or investment entities, including OMERS Private Equity Europe Limited ("OPEE"), OMERS Infrastructure Europe Limited ("OIE"), OMERS Capital Markets Europe Limited ("OCM") and Oxford Properties Management (UK) Limited ("OPM") (collectively the "OMERS UK Affiliates"), carry on business in the United Kingdom ("UK").

The OMERS UK Affiliates provide advice and investing services in relation to OMERS public and private investments in UK and European public investments, private equity, infrastructure, and real estate assets. These investment services are carried out year round, rather than on a seasonal or irregular basis. OPEE, OIE and OPM are authorised and regulated by the Financial Conduct Authority in the UK.

UK Modern Slavery Act

The UK Modern Slavery Act 2015 ("MSA") came into force in October 2015. The MSA introduced a requirement for certain commercial organisations operating in the UK to publish a statement setting out the steps they have taken during the preceding financial year to ensure that slavery and human trafficking are not taking place in any part of their own business, or in any of their supply chains.

This statement is the MSA statement for the OMERS UK Affiliates in respect of their financial year ending on 31 December 2022.

References in this statement to *forced labour* shall mean slavery and human trafficking within the meaning of the MSA.

Policies

The OMERS UK Affiliates oppose the use and exploitation of forced labour and expect all those who work for them or on their behalf to share their zero-tolerance approach. Eradicating forced labour is consistent with the OMERS UK Affiliates' ethical principles and is important to protect their reputation, sustain investor and consumer confidence, and secure their commercial position.

The OMERS UK Affiliates' employees are subject to the OMERS Code of Conduct and Ethics, which emphasises the need for all employees to act ethically, with integrity and to the highest standards and to conduct all OMERS UK Affiliate business in this manner at all times. Employees are also required to obey the law wherever they do business and are expected to act respectfully and ethically with regard to anyone inside and outside of the organisation. Employees have a responsibility to report any instances of inappropriate or unethical behaviour or practices by others that violates or appears to violate the Code of Conduct and Ethics.

The OMERS UK Affiliates' employees are also covered by the OMERS Workplace Investigations Policy and Whistleblower Guideline, which encourages the reporting of any and all wrongdoing, and have

access to an Ethics Hot Line operated by an independent third-party, which provides employees of the OMERS UK Affiliates with a confidential communication channel for reporting concerns about any wrongdoing in confidence and without fear of reprisals or retaliation.

In addition, the OMERS UK Affiliates must ensure, consistent with the OMERS Statement of Investment Policies & Procedures and Sustainable Investing Policy, that environmental, social and governance (“ESG”) factors (including human rights and forced labour) are incorporated into their investment advisory processes and asset management practices. They also encourage, where able and appropriate, the adoption of similar ESG practices at the level of OMERS portfolio companies.

Before advising on any investments, the OMERS UK Affiliates carry out due diligence into relevant aspects of the target business, which includes an ESG assessment. Where appropriate, ESG assessments address operational risks such as those which could arise through its supply chain with respect to human rights and labour practices. ESG factors are also integrated into asset management practices, as outlined in each investment team’s ESG Assessment Procedures.

As a whole, the risk of forced labour occurring in the businesses or supply chains of the OMERS UK Affiliates is considered to be low.

Supply Chain

The OMERS UK Affiliates’ suppliers can be broadly categorised as follows: (i) real estate (e.g., leases); (ii) professional services; (iii) travel; and (iv) technology (including software). The OMERS UK Affiliates expect their suppliers to adhere to responsible human rights practices that are consistent with the OMERS UK Affiliates’ own principles, as outlined above. The OMERS UK Affiliates are committed to reviewing and assessing their supplier due diligence processes and demonstrating their progress over time.

This statement has ~~2023~~ prepared for the purposes of the MSA. It will be reviewed annually.
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