

Sustainable Investing Policy

INVESTMENT



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Effective
April 1, 2021

OVERALL PRINCIPLES

As a long-term investor and fiduciary, OMERS believes in the importance of incorporating sustainable investing principles into our investment analysis and decision-making processes. This practice enables us to make better informed risk-adjusted return decisions in pursuing new investment opportunities and managing existing assets. Furthermore, OMERS seeks to uphold high standards of business integrity, honesty and fairness and to comply with local laws and international good practice.

OMERS believes well-run organizations with sound environmental, social and governance (“ESG”) practices will perform better, particularly over the long-term. Integrating ESG factors into our investment approach is consistent with our objective to meet our long-term payment obligations to our members.

This Policy applies to investments of the OMERS Primary Pension Plan, the Supplemental Pension Plan and the Retirement Compensation Arrangement.

Next renewal date:	January 2022
Frequency of review:	Every year

Introduction

This Policy outlines OMERS approach to sustainable investing and provides the foundation and framework upon which OMERS pursues sustainable investing activities. The Policy applies across the OMERS investment portfolio although OMERS level of influence and method of engagement within the portfolio will vary.

At OMERS, our core mission is to make OMERS a sustainable, affordable and meaningful defined benefit Plan. The long-term nature of our pension obligations is a primary driver of our approach to sustainable investing: we believe well-run organizations with sound ESG practices will perform better, particularly over the long-term. We believe, therefore, that ESG factors may be relevant to the financial performance of the companies and assets in which we invest. Integrating ESG factors into our decision-making, along with evaluation of other risk factors, is both prudent and consistent with our fiduciary duties.

In developing this Policy, we engaged a cross-section of stakeholders and relevant industry guidelines, including referring to the United Nations supported *Principles for Responsible Investment*.

Our Approach

Four overarching strategies guide our approach to sustainable investing: Integration, Engagement, Collaboration and Adaptation.

Integration

We seek to integrate ESG factors into our investment analysis and decision-making processes and asset management practices. Such factors could have a material impact on investment performance. Our investment and asset management teams assess ESG factors through processes that align with the applicable asset class and investment strategy.

Engagement

We seek to actively engage with our investee companies and other stakeholders to promote sustainable business practices and long-term thinking while addressing material ESG factors in their strategy and operational practices. We tailor each engagement based upon the investment strategy and OMERS level of control and influence.

Collaboration

We collaborate with like-minded organizations, investors, regulators and legislators to exchange information and advocate for better transparency and performance on relevant standards and practices.

Adaptation

Recognizing the rapid evolution of the ESG landscape, we commit to enhancing our capabilities and practices to ensure they remain transparent, relevant and effective over time.

These strategies are executed across OMERS & Oxford's investment platforms. Successful ESG integration requires that investee companies disclose this information. Disclosure of financially relevant, potentially material ESG factors allows investors to make better capital allocation decisions. We support alignment of ESG-related disclosure with the Sustainability Accounting Standards Board (SASB) and the framework of the Task Force on Climate-related Financial Disclosures (TCFD).

Governance

The Investment Committee of the OMERS Administration Corporation Board ("AC Board") is responsible for overseeing OMERS approach to sustainable investing. The Chief Executive Officer is responsible for the execution of this Policy across the OMERS enterprise and has established a Sustainable Investing Committee, which includes the Chief Investment Officer, representatives from each of our Business Units and from functional areas such as risk, finance, legal and communications. The Sustainable Investing Committee operates under terms of reference which include: staying abreast of emerging ESG and sustainable investing issues and best practices; education and training; reporting; and recommending amendments to the Policy and any related Guidelines.

OMERS investment and asset management professionals are primarily responsible for integrating ESG factors into investment and operational decisions. Within the investee companies, where OMERS has

positions of influence, the investee Board will agree on strategy and ESG priorities while company management will be responsible for implementing any Board-approved ESG strategy or priority and reporting on progress during our ownership period. Where additional subject matter expertise is needed, the investment and asset management teams utilize external resources, as necessary, to drive better ESG due diligence, integration and management.

OMERS may determine that there are industries, sectors, jurisdictions, markets, or companies where the risks posed by ESG factors outweigh any potential benefits of investing.

Communications and Reporting

OMERS commits to transparent member and stakeholder communication on our progress in implementing our approach to Sustainable Investing. We will report annually, describing actions taken by OMERS to integrate ESG factors in investment decision-making and operational processes and highlighting assets in the OMERS portfolio undertaking meaningful ESG initiatives with additional information provided on our website.

Exceptions

The Policy Sponsor may grant non-substantive exceptions to this Policy. The reasons for granting an exception should be recorded in writing and communicated annually to the AC Board.

Responding to Incidents of Non-Compliance

The Policy Manager is accountable for identifying incidents of non-compliance under this Policy and reporting such incidents to the Policy Sponsor.

Monitoring and Reporting

The Policy Monitor is responsible for the administration of the Policy, including coordinating training as required and ensuring that procedures are in place at the Business Units to operationalize this Policy and any related Guidelines.

ROLES & RESPONSIBILITIES

Policy Approver	AC Board of Directors	Responsible for approving the Policy
Policy Sponsor	Chief Investment Officer	Ultimately accountable for the Policy, including its development, implementation and administration. Guidelines are approved by the SET. ESG Assessment Procedures are developed by the Business Units
Policy Manager	Chief Legal & Corporate Affairs Officer	Responsible for the design and operational effectiveness of the day-to-day administration of the Policy
Policy Monitor	Vice President, Sustainable Investing	Responsible for the monitoring, compliance and reporting functions of the Policy