

# Charities & Not-for-Profits Policy

GLOBAL COMMUNICATIONS



Shelagh Paul



Effective  
December 1, 2025

## OVERALL PRINCIPLES

Engagements should, at all times, be based on the fiduciary obligation OMERS has to its Plan Members.

We will only make expenditures or otherwise engage with registered charitable and not-for-profit organizations in alignment with the terms and requirements of this Policy and the associated *Charities & Not-for-Profits Guideline* (the "Guideline").

**This Policy applies to all employees, Directors and Designated Contractors across OMERS which, for clarity, includes Oxford.**

**For the purposes of this Policy, "Engagement" is defined as monetary expenditures and/or non-monetary activity by or on behalf of OMERS (as described in the Guideline), in association with or in support of charitable or not-for-profit organizations or professional, commercial or trade associations.**

**This Policy does not restrict the ability of employees, Directors or Designated Contractors to make a personal contribution to a charity or community organization, provided that their contribution is not associated, or perceived to be associated, with OMERS.**

Next renewal date:	December 2028
Frequency of review:	Every 3 years

## Approach

Except as otherwise provided below, OMERS shall not make any expenditure, the primary purpose of which is charitable in nature.

The purpose of this Policy is to outline the permissible Engagements with charitable and not-for-profit entities to promote OMERS business interests.

OMERS may promote its business interests through charitable and not-for-profit Engagements, where the primary purpose of the Engagement is brand enhancement, business development, marketing, enhancing employee and/or stakeholder engagement or networking.

Any related receipt of goods and/or services must be purchased in accordance with relevant policies and guidelines.

## Exceptions

Exceptions to this Policy may be made with the written authorization of the Policy Sponsor.

## Responding to Incidents of Non-Compliance

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

Monitoring and Reporting

The Policy Manager is accountable for the administration of the Policy, including implementing documented procedures to enable compliance, monitoring and reporting.

ROLES & RESPONSIBILITIES

Policy Approver	Governance Committee of the AC Board	Responsible for approving the Policy
Policy Sponsor	Chief Operating Officer	Ultimately accountable for the Policy, including its development, implementation and administration
Policy Manager and Monitor	SVP Global Communications	Responsible for the design and operational effectiveness of the day-to-day administration of the Policy, and for the monitoring and compliance functions of the Policy