

OMERS SC Member Background Checks Policy



SC CEO

Effective
November 1, 2025

OVERALL PRINCIPLES

Background checks provide a safeguard that Members of OMERS Sponsors Corporation (“SC”) and OMERS Administration Corporation (“AC”) have the qualifications and qualities required of a Member of the SC and AC, under the by-laws of the SC.

Background checks are conducted for proposed and nominated Members as provided for thereunder.

This Policy applies to all individuals who are proposed or nominated for appointment or reappointment as a Member of the SC or AC, respectively.

Next renewal date:	May 2028
Frequency of review:	Every 5 years

What are the types of background checks?

Background checks will include some or all of the following:

- criminal record check
- credit and financial check
- education verification
- professional credentials confirmation
- employment reference checks
- public safety verification
- civil litigation search
- bankruptcy search
- media search

When are background checks conducted by or on behalf of the SC?

A background check will be completed before the appointment or reappointment of a Member of the SC or AC as provided for under the by-laws of the SC. At the discretion of the Corporate Governance & Risk Committee of the SC (“CGRC”), a background check may be conducted other than at the time an individual is proposed or nominated for appointment or reappointment as a Member of the SC or the AC, as applicable, where there are reasonable grounds to believe that the individual does not have the qualifications or qualities required of a Member of the SC or AC, respectively, under the by-laws of the SC.

What happens with the information collected during a background check?

Information from a background check may impact the proposed appointment, reappointment or removal of a Member of the SC or AC.

Except with the express consent of the affected individual, information collected during a background check is kept confidential and only shared with counsel and those individuals involved in a decision about the proposed appointment, reappointment or removal of a Member. Such information is subject to

both the Confidentiality Policy and the Privacy Policy of the SC. For greater clarity, with the express consent of the affected individual, the SC may disclose personal information collected during a background check under this Policy that is of concern to the CGRC to a Sponsor Organization that proposed or nominated the individual to be a Member of the SC or AC, as applicable.

What are my obligations as a Member of the SC or AC?

Throughout your relationship with the SC or AC, you are expected to disclose to the Policy Sponsor any information or personal circumstances that may be relevant to the position you hold, such as:

- loss or restriction of any required professional designation;
- your status of a bankrupt;
- breach of the SC or AC’s Code of Conduct, as applicable;
- any charges or convictions for criminal offences; and
- civil actions alleging fraud, theft, deceit, misrepresentation or similar misconduct.

Is your consent needed for background checks?

The SC will not conduct background checks about you without your consent. If, however, you do not provide your consent, your position with the SC or AC as a Member may be impacted.

Exceptions

The Policy Sponsor or delegate may grant exceptions to this Policy. The reasons for granting an exception will be recorded in writing and held in the permanent records of the SC. Notwithstanding, and for greater certainty, there will be no exception granted from the requirement to conduct a background check for all individuals who are proposed or nominated for appointment or reappointment as a Member of the SC or AC, respectively, unless provided for under the applicable SC by-law.

Responding to Incidents of Non-Compliance

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

Monitoring and Reporting

The Policy Manager and Monitor is responsible for implementing procedures for monitoring compliance with this Policy, responding to incidents of non-compliance, and providing a quarterly report to the Policy Sponsor.

ROLES & RESPONSIBILITIES		
Policy Approver	Corporate Governance & Risk Committee of the OMERS Sponsors Corporation Board	Responsible for approving the Policy
Policy Sponsor	CEO, OMERS Sponsors Corporation	Ultimately accountable for the Policy, including its development, implementation and administration
Policy Manager	Executive Director, Governance & General Counsel, OMERS Sponsors Corporation	Responsible for the design and operational effectiveness of the day to day administration of the Policy
Policy Monitor	Executive Director, Governance & General Counsel, OMERS Sponsors Corporation	Responsible for the monitoring, compliance and reporting functions of the Policy