

Sustainable Investing Policy

INVESTMENT



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Effective
January 1, 2026

OVERALL PRINCIPLES

OMERS incorporates sustainable investing principles across the various stages of our investment lifecycle – a process grounded in our three Sustainable Investing pillars (**Integration**; **Collaboration**; and **Engagement**). We believe that doing so enables us to make better-informed, and risk-adjusted return decisions. 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 that well-run organizations with sound sustainability practices will perform better, particularly over the long term. Integrating sustainability-related factors (“Sustainability Factors”) into our investment approach is consistent with our objective to meet our financial obligations and fulfill the pension promise.

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

Next renewal date:	January 2028
Frequency of review:	Every two years

Introduction

OMERS serves as the fiduciary and steward of the retirement income of our members in communities across Ontario. With a team of investors and professionals across offices around the globe we hold a diversified portfolio of investments spanning Capital Markets, Infrastructure, Real Estate and Private Equity.

Our core strategy is to make OMERS a sustainable, affordable and meaningful defined benefit Plan.

In developing this Policy, we engaged a cross-section of stakeholders and referred to relevant industry guidelines, including the United Nations supported Principles for Responsible Investment and the Canadian Coalition for Good Governance Stewardship Principles.

Purpose and Scope

This Policy outlines our approach to sustainable investing and provides the foundation upon which this activity relies. It serves as an overarching guide for our investment teams, external managers and executives. The Policy applies across the OMERS investment portfolio and implementation varies based on our level of control and influence. OMERS Business Units (BU) use the Policy in developing their approach to sustainable investing which reflect the specific dynamics of their underlying asset classes.

As a globally diversified, long-term investor, OMERS exposure to the systematic risks inherent in the market requires us to be intentional and proactive in addressing system-level sustainability-related risks and opportunities, like climate change, and contribute to the long-term resilience of the financial, environmental and social systems on which our investment returns rely.

This Policy also served as a catalyst for setting OMERS net zero 2050 commitment and Climate Action Plan and is supplemented and implemented in conjunction with various other policies and documents as outlined in the Related and Supplementary Documents section.

Our Approach

Our three overarching Sustainable Investing Pillars guide our approach to sustainable investing: Integration, Collaboration and Engagement.



INTEGRATION

We seek to integrate Sustainability Factors, where relevant and material, into our investment decision-making processes, and asset management practices. These factors may have a material impact on investment performance. Our investment and asset management teams assess Sustainability Factors through processes tailored to the applicable asset class and investment strategy.



COLLABORATION

We collaborate with like-minded organizations, investors, regulators and legislators with a view to improving the foundations for sustainable investment. We recognize that the long-term health and sustainability of financial, environmental and social systems can impact the delivery of the pension promise.



ENGAGEMENT

We seek to actively engage with our investee companies and other stakeholders to promote sustainable business practices and long-term thinking. Our approach to engagement is informed by our investment strategy and level of control and influence.

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

Sustainability Factors

Sustainability Factors are often categorized as environmental, social or governance (ESG) issues that may impact investment performance. OMERS seeks to integrate these factors, where material, into our investment decision-making processes, and in our collaboration and engagement efforts with portfolio companies and other stakeholders, with a view to improving portfolio returns and the sustainable finance ecosystem upon which those returns rely. When assessing investment opportunities or managing our portfolio we consider and engage on a range of factors including the following,

Environmental

Climate Change
Pollution
Biodiversity
Natural Resources Impact
Waste and Hazardous Materials
Resource Efficiency
Extreme Weather Events

Social

Human Rights
Labour Practices
Government and Community
Relations
Inclusion and Diversity
Health and Safety
Indigenous Rights
Human Capital Management
Product Stewardship

Governance

Shareholder Rights
Board Structure
Executive Compensation
Anti-Corruption and Anti-Money
Laundering
Business Conduct
Risk Management
Cybersecurity
Data Protection and Privacy

Integration

Direct-Drive¹

For direct drive investment strategies, we integrate relevant Sustainability Factors into our investment due diligence and approval processes, highlighting material issues to the investment approval bodies. We also integrate relevant Sustainability Factors into our asset management approaches; our influence in this regard is commensurate with our level of ownership.

Each investment team develops specific ESG Assessment Procedures to inform its approach. Procedures may include, but are not limited to:

- due diligence questionnaires to surface material ESG issues;
- escalating review of Sustainability Factors to subject matter experts where material issues may require specific expertise;
- providing an assessment of Sustainability Factors (risks and/or opportunities) in investment approval documents; and
- setting and monitoring progress on Sustainability portfolio targets and related key performance indicators.

External Managers

For strategies not managed directly by OMERS, we work with partners and external investment and asset managers. We have processes within each BU to assess their alignment with the principles described in this Policy. Assessments are performed when engaging new external investment and asset managers with the objective of avoiding inconsistency with OMERS approach to sustainable investing. This assessment includes reviewing their sustainable investing policies, reports and procedures, or equivalents, and is refreshed periodically.

Investment Restrictions

As a fiduciary, we are conscious that restricting investments in entire industries or sectors limits the range of investment opportunities and overall portfolio diversification. As such, the criteria for exclusion is necessarily very stringent. Our preferred approach is active engagement rather than divestment. However, OMERS may assess specific industries or sectors against sustainability-related factors to determine whether to exclude them from our investment portfolios. We have developed a risk-based, principled framework

to determine exceptional circumstances where we exclude investments.

Collaboration

We recognize that the long-term health and sustainability of financial, environmental and social systems can impact the delivery of the pension promise. As such, we believe that through collaboration with like-minded institutions, advocacy, and partnership building, we amplify the impact that OMERS can have on sustainability-related issues.

We are actively involved in several organizations, networks and collaborative initiatives committed to advancing sustainable investing and business practices.

Advocacy

OMERS engages with regulators, policy makers, and standard-setting bodies such as the International Sustainability Standards Board to advocate for the harmonization of sustainability reporting standards that supports long-term risk mitigation and value creation. Our involvement with leading organizations, initiatives and networks enables us to further amplify these advocacy efforts. We are committed to promoting better transparency in sustainability-related data and disclosure, aligned with relevant frameworks, standards and practices, to improve the functioning of financial markets at the system level. Disclosure of financially material Sustainability Factors following globally recognized and harmonized frameworks allows us to make better-informed investment decisions, and more effectively play our role in efficient and optimal capital allocation.

Engagement

Engagement with investee companies is a hallmark of our stewardship of the OMERS plan assets. Through our engagement activities, including our proxy voting program, we seek to encourage and support actions by company boards and management teams that will enhance long-term value.

We seek to actively engage with these companies to promote sustainable business practices and long-term thinking while addressing material Sustainability Factors in their strategy and operational practices. For example, engagement on climate change and company net zero pathways is a priority for high impact sectors. Our engagement approach will depend upon OMERS level

¹ Direct-drive strategy refers to the use of internal investment teams to source and manage investment assets, versus external managers.

of control and influence over the investee company and the associated investment strategy.

While we prefer engagement to divesting, divestment may be an option when there exists a material misalignment with OMERS approach to sustainability and engagement has proven unsuccessful following an appropriate escalation process.

Private markets

In our private markets investments where we hold direct ownership, OMERS engages directly with investee companies in various ways. For example, when we have a significant ownership stake, we typically have governance rights, which may include active board participation of our own employees or external director nominees. We also maintain regular interactions with board members and management teams, and we seek to ensure effective communication of material sustainability risks and opportunities.

Public markets

In our public markets portfolio, we exercise stewardship through multiple channels, including through proxy voting and direct engagement including, where appropriate, alongside our investing peers.

Our process includes actively engaging with investee companies with the aim of improving outcomes and enhancing value. We believe that companies should maintain policies and procedures with respect to Sustainability Factors that materially affect performance or mitigate risk. These policies should be an integral part of the overall management of a company. We take our responsibilities as a long-term investor very seriously and believe that, by actively engaging in a constructive way, we can influence positive change.

Proxy voting

Consistent with our fiduciary obligations, OMERS exercises its ownership rights by voting proxies diligently and in a manner intended to optimize the long-term value of its investments. Our Proxy Voting Guidelines are available on our website alongside a subset of our proxy voting records. These are intended as a guideline for OMERS and to assist the directors and management of companies in which we invest, as well as other stakeholders, to know in advance how we are likely to vote on issues of importance.

We generally support proposals that take into consideration or improve policies or practices relating to climate change, environmental impacts of company products and operations, community impact, human

rights and work standards, diversity, cyber security and data privacy, where doing so enhances overall shareholder value. With respect to climate change, we expect companies to disclose the governance structure around the management of climate risk and opportunity, the impact it will have on their business as well as the policies and procedures in place to mitigate risks. OMERS may withhold votes for the chair of the relevant board committee if the board has failed to appropriately oversee the management of sustainability risks.

Reporting

OMERS commits to transparent member and stakeholder communication of our progress on and approach to sustainable investing. We report annually, describing actions taken by OMERS as we execute on our sustainable investing principles and Climate Action Plan. We will continue to provide additional information more frequently on our website. Sustainability-related metrics that OMERS discloses will continue to be integrated in our annual report alongside our financial disclosures. This includes our climate metrics and our progress on meeting our related climate goals.

As part of our Sustainable Bond Framework, OMERS Finance Trust commits to publishing a Sustainable Bond Report annually.

Governance

The OMERS Administration Corporation Board (the AC Board), through its Investment Committee, is responsible for overseeing our approach to sustainable investing. The CEO has established a Sustainable Investing Committee (SIC), which is chaired by the Chief Legal & Sustainability Officer (CLSO) and includes the Chief Investment Officer (CIO), representatives from each of our investment teams and from functional areas such as risk, finance, legal, human resources, and communications. The CIO and CLSO are accountable for the Policy, including its development, implementation, and administration. The AC Board, through its Investment Committee, receives regular reporting on sustainable investing from the individual Business Units and at the enterprise level.

The SIC operates under terms of reference which include:

- staying abreast of emerging sustainable investing issues and best practices
- providing education and training
- reviewing communications and reporting, and
- recommending amendments to this Policy and related guidelines.

Our Climate Action Plan Implementation Team (CAP IT) has been established as a management committee under the SIC to facilitate actions across the Plan in furtherance of our portfolio climate-related goals articulated in the CAP.

OMERS investment and asset management professionals are primarily responsible for integrating specific Sustainability Factors into investment and asset management decisions. Where additional subject matter expertise is required, the investment teams may utilize internal or external resources. As noted above under the Engagement section, our investment teams exercise governance over individual investee companies commensurate with our ownership stake.

Risk Management

The integration of Sustainability Factors in our investment process contributes directly to the understanding and management of the embedded risk. Risk management at OMERS is guided by our risk appetite statements². Our risk management framework ensures that the AC Board and senior management continue to have effective oversight of OMERS risk profile. Our risk framework recognizes climate risk as an investment risk.

Climate change is the risk of adverse impact on asset values or performance resulting from the systemic manifestations of climate change encompassing both physical impacts and transitioning to a low-carbon economy.

Physical Risk is the risk resulting from the impact of gradual global warming and higher frequency of extreme weather events.

Transition Risk is the risk associated with transitioning to a lower-carbon economy, which may entail policy, legal, technology, and market changes to address mitigation and adaptation requirements related to climate change.

Our Investment Risk Policy describes climate change metrics monitored.

Monitoring of Policy

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

related Guidelines. Each Business Unit is accountable for their implementation of the Sustainable Investing Policy supported by their ESG Assessment Procedures.

Exceptions

The Policy Sponsor may grant non-substantive exceptions to this Policy. The reasons for granting an exception must 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.

² OMERS defines the desired amount of risk it believes appropriate to take in the pursuit of its objectives through the Enterprise Risk Appetite Statements.

Related and Supplementary Documents

- Statement of Investment Beliefs
- Statement of Investment Policies and Procedures
- Investment Risk Policy
- Sustainable Investing Guidelines
- Climate Action Plan
- Proxy Voting Guidelines
- ESG Assessment Procedures
- Investment Exclusion Procedures

ROLES & RESPONSIBILITIES

Policy Approver	AC Board of Directors	Responsible for approving the Policy
Policy Co-sponsors	Chief Investment Officer Chief Legal & Sustainability Officer	Ultimately accountable for the Policy, including its development, implementation and administration.
Policy Manager	Chief Legal & Sustainability 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