

# Charities & Not-for-Profits Policy

GLOBAL COMMUNICATIONS



Shelagh Paul



Effective  
December 1, 2022

## OVERALL PRINCIPLES

Payments made to charitable and not-for-profit organizations, whether for charitable or business purposes, should always be based on the fiduciary obligation OMERS has to its plan members.

We will only make expenditures to registered charitable and not-for-profit organizations, and charitable events that align 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 Contractors across OMERS which, for clarity, includes Oxford.**

**This policy does not restrict the ability of Employees, Directors or 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 2025
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.

This Policy is not intended to limit, and does not apply to, expenditures made to charitable or not-for-profit organizations or to professional, commercial or trade associations, the primary purpose of which is in the nature of brand enhancement, business development, marketing, enhancing employee engagement, or networking, the primary purpose of which is the support of the foregoing purposes.

## Exceptions

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

Minor payments to registered charities in support of life events (retirements and deaths) are permitted.

## 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

On a regular basis, the Internal Audit Team will undertake an audit to ensure compliance with this Policy. The results of these audits will be shared with the Policy Sponsor and Policy Approver.

ROLES & RESPONSIBILITIES		
Policy Approver	Governance & Risk 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