

Communications Policy

COMMUNICATIONS



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OVERALL PRINCIPLES

Our goal is to provide clear and timely information. Consistency and accuracy are important, and this Policy outlines the process for overseeing communication to our key audiences.

Incoming media enquiries should be directed to the Manager, Media Relations, or the Vice President, Communications, Oxford or in accordance with approved procedures.

This Policy applies to all Employees and Contractors across OMERS.

The OMERS Sponsors Corporation (“SC”) oversees and administers a parallel and complementary Communications Policy.

Next renewal date:	January 2022
Frequency of review:	Every 2 years

Defining our Key Audiences

Understanding the needs of each of our target audiences in order to tailor the purpose, tone and message in our communications is important.

Broadly we have three key categories of audiences:

OMERS Stakeholders:

- Plan members – people who belong to the Plan, including active, deferred and retired members and beneficiaries;
- employers – organizations that actively participate in the Plan;
- sponsors, unions, associations and organizations that represent either members or employers, and that have an interest in the Plan design but do not actively contribute to the Plan on behalf of members;

OMERS Employees:

- our employees – who have a key responsibility to be representatives and ambassadors of the OMERS brand.

Other External Parties:

- the global business and investment community – those integral to the success of our business;
- media – an important resource for advancing key business objectives; and
- governments and regulators which exercise influence over the Plan and/or oversee aspects of OMERS activities, whether in Canada or in a jurisdiction where OMERS invests.

Key Principles for our Communication

The primary objective of all communication with our audiences is to promote an understanding of OMERS defined benefit Pension Plans and/or

investing/enterprise activities. Our communication activity builds and protects our brand and reputation.

The Policy Manager is responsible for ensuring information is communicated in a clear, consistent and timely manner by designated individuals and through the channels (websites, newsletters, meetings, etc.) that work best for each audience.

Release of any of the following information must be approved by a C-Level member of the Executive Leadership Team (“ELT”), or made in accordance with guidelines or procedures approved by those members of the ELT, or in accordance with a Business Unit’s approved marketing and communications plan:

- important information about pension administration, including to members, employers and stakeholders;
- Plan funding, contribution rates and Plan design information;
- investment information;
- significant changes in leadership or corporate structure;
- positions on public policy and related issues;
- major projects and issues;
- incentives and promotions; or
- responses to constituent requests.

Routine matters that include day-to-day operating business or matters of Plan administration are not considered within the scope of this Policy, including Plan administration communication, conferences, etc.

The *Financial Disclosure Policy* provides guidance on the review and release of material financial information. Information that is subject to review by the Financial Disclosure Committee is approved for release by the CFO, after Board approvals, if required. Such information should be shared in advance with the Policy Manager.

If there are no confidentiality obligations, summaries of Board and Committee decisions are provided on our website.

Who Can Speak Publicly on Behalf of OMERS?

There are specific spokespeople authorized to speak on behalf of OMERS, including:

- AC CEO;
- SVP, Global Communications;

- Head of Brand, Marketing and Communications, Oxford; or
- Designates of these spokespeople.

Media

OMERS works with the media, whenever appropriate, to promote fair and accurate coverage of the organization. OMERS does not comment on or release information about potential transactions or to speculate on rumors.

Press releases must be approved as follows:

The CIO for transaction announcements. Asset level media releases are approved at a local leadership level in coordination with the investment Communications team. The CEO or President must approve press releases that cover other OMERS matters.

Any media enquiries should be directed to:

- Manager, Media Relations; or
- Vice President, Communications, Oxford.

Social Media

OMERS increasingly uses social media to share relevant information and engage with members. Employees have significant responsibilities, as representatives of the OMERS brand, both online and off. Employees must consider the impact of their social media activities on OMERS reputation and ensure that the *OMERS Code of Conduct and Ethics* and other relevant policies are being followed at all times.

Third Party Endorsements

OMERS is sometimes asked to provide endorsements that speak to the skills, work product or experience of our business/service partners and vendors. While our practice is not to provide endorsements, there may be situations where an exception is warranted. Any use of the OMERS name in connection to another brand needs the approval of the business area VP and the VP, Corporate Communications.

Exceptions

The Policy Sponsor may grant exceptions to this Policy. The Policy Monitor will maintain a record of such exceptions in writing.

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, as well as coordinating training as required.

ROLES & RESPONSIBILITIES

Policy Approver and Sponsor	Chief Operating Officer	Ultimately accountable for the Policy, including its approval, development, implementation and administration
Policy Manager	SVP, Global Communications	Responsible for the design and operational effectiveness of the day-to-day administration of the Policy
Policy Monitor	VP, Corporate Communications	Responsible for the monitoring, compliance and reporting functions of the Policy