

# Communications Policy

COMMUNICATIONS & PUBLIC AFFAIRS



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## OVERALL PRINCIPLES

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

Incoming media enquiries should be directed to the VP, Corporate Communications, or Director, Communications, Private Markets, or VP, Marketing & Communications, Oxford, or in accordance with approved procedures.

**This Policy applies to all employees and third-party contractors across OMERS. For the purpose of this Policy, OMERS is comprised of OMERS Administration Corporation (“OAC”) and its Business Units. It does not apply to portfolio companies.**

Next renewal date:	January 2019
Frequency of review:	Every year

## 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: constituents, employees and other external parties.

### Constituents:

- Plan members – people who belong to the Plan, including active, deferred and retired members and beneficiaries;
- employers – organizations that actively participate in the Plan;
- stakeholders – sponsors, unions, and associations 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;
- governments – the Province of Ontario, the Government of Canada, and other jurisdictions that have influence on the Plan, other constituents and Plan performance; and
- regulators – arms-length organizations that oversee the activities of OMERS.

### Employees:

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

### Other External Parties:

- business and investment community – those integral to the success of our business; and
- media – an important resource for advancing key business objectives.

## 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 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 (website, newsletters, meetings, etc.) that work best for each audience.

Release of any of the following information must be approved by a member of the Senior Executive Team ("SET"), or made in accordance with guidelines or procedures approved by a member of the SET, or in accordance with a Business Unit's approved marketing and communications plan:

- Plan funding, contribution rates and Plan design information;
- significant changes in leadership or corporate structure;
- important changes in pension administration;
- information to help employers administer the Plan;
- 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:

- OAC CEO and the other members of SET;
- SVP, Communications & Public Affairs; or
- Designates of these spokespeople.

## Media

OMERS works with the media, whenever appropriate, to promote fair and accurate coverage of the organization.

Media releases are an important tool for external communication and all press releases must be approved by the CEO, or another member of SET combined with the CFO for transaction announcements or the COO for other matters, with the exception of asset level media releases which are approved at a local level.

Any media enquiries should be directed to:

- VP, Corporate Communications;
- Director, Communications, Private Markets; or
- VP, Marketing & Communications.

OMERS does not comment on or release information about potential transactions until approvals are in place and an announcement is warranted.

## 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.

## 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, Communications & Public Affairs	Responsible for the design and operational effectiveness of the day-to-day administration of the Policy
Policy Monitor	Director, Communications Operations	Responsible for the monitoring, compliance and reporting functions of the Policy