

Lobbying Policy

COMPLIANCE & ETHICS



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OVERALL PRINCIPLES

If your role at OMERS includes communication with public officials, anywhere in the world, you are responsible for conducting your activities in a transparent and ethical manner.

Due to the complex legislative requirements for lobbying, individuals who conduct such activities are responsible for ensuring they are fully aware of their legal and ethical obligations.

When in doubt, consult with our in-house designated Lobbying specialists.

For the purpose of this Policy, "OMERS" relates to OMERS Administration Corporation and its Business Units. It does not apply to Portfolio Companies.

This Policy confirms the commitment of OMERS that all of its lobbying activities – wherever conducted – be undertaken in a transparent and ethical manner that meets all applicable legal requirements.

This Policy applies to all OMERS employees, Directors and all third-party contractors acting on our behalf.

Next scheduled date for review:	May 2018
Frequency of review:	Every 3 years

Lobbying 101

Lobbying is communicating with public officials on how legislation, policies or programs are being introduced or changed and how grants, contributions, contracts and other financial benefits are being awarded.

Communication may be initiated by us, a third-party contractor whom we engage, or the public official. This includes elected or appointed public office holders and members of his/her staff.

Lobbying legislation varies across jurisdictions and is complex. Consultation with our in-house specialists is always strongly encouraged as failure to comply may result in fines, penalties and reputational damage.

Typically there are two types of lobbyists: "in-house", and "external consultants", who are third-party contractors we may retain to lobby on our behalf.

In-House Lobbying

Most, if not all, lobbying at OMERS is conducted through "in-house" lobbyists. OMERS and certain of its Business Units maintain registrations in this regard. These registrations designate which employees are internal lobbyists and are a matter of public record.

These registrations list all individuals who are expected to conduct lobbying activities as part of their job. If you are unsure if you are on this list, then you are most likely not a registered in-house lobbyist and thus should consult before you conduct any lobbying activities.

What is Lobbying?

If the answer is "yes" to any of the following questions, the activity may be lobbying. This list is illustrative and not necessarily comprehensive.

- Are you communicating with a public official about the making, developing or amending of any laws or government programs?

- Are you encouraging members of the public (including OMERS Plan members) to express views to any level of government?
- Are you dealing with any level of government about the sale of public assets or businesses (i.e., privatization) or the award of a financial benefit?
- Are you communicating with a public official on providing services to the government?
- Are you or a third-party arranging a meeting between a public official and one or more representatives of OMERS?
- Are you contacting a public official to determine what additional information is required to improve or accelerate an approval process?

What is not Lobbying?

The following are generally not considered lobbying:

- responding to a written government-initiated request for information
- submissions to the government in response to public consultations (e.g., requests for comment on proposed new or amended laws or regulations)
- submissions about the enforcement, interpretation or application of any act or regulation (unless this includes suggestions for changes)
- submitting a procurement bid or proposal where the communication does not extend beyond the submission of the application and providing general information
- making inquiries about the terms of an application process or program

Using Third Parties

Prior to engaging the services of a third-party contractor (individual or agency) for the purpose of lobbying on behalf of OMERS, you are responsible for confirming their registration under applicable laws and ensuring you obtain appropriate contractual representations to comply with all applicable laws, including lobbyist laws.

Lobbying by OAC Directors

There is no expectation that the OAC Board of Directors should conduct lobbying activities on behalf of OMERS or its Business Units. Where OAC Directors conduct lobbying activities on behalf of others, they are responsible for maintaining the appropriate registrations and filing appropriate returns. When in doubt, Directors should consult with a designated Lobbying Contact.

Designated Lobbying Contacts

- OMERS Enterprise – Josh Bezonsky, or Chris Morley
- OPM – Tenio Evangelista
- Oxford – Judi George

Exceptions

Exceptions to this Policy must be approved by the Policy Sponsor.

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.

Monthly/Quarterly: Compliance & Ethics coordinates with the other designated Lobbying Contacts on the preparation and filing of returns on a timely basis as required under lobbyist laws.

ROLES & RESPONSIBILITIES

Policy Approver	Governance Committee of the OAC Board	Responsible for approving the Policy
Policy Sponsor	Chief Risk Officer	Ultimately accountable for the Policy, including its development, implementation and administration
Policy Manager	VP, Compliance & Ethics	Responsible for the design and operational effectiveness of the day to day administration of the Policy
Policy Monitor	Director, Compliance & Ethics	Responsible for the monitoring, compliance and reporting functions of the Policy