

# Political Donations Policy

COMMUNICATIONS & PUBLIC AFFAIRS



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Effective  
January 1, 2017

## OVERALL PRINCIPLES

As a Defined Benefit pension plan with a significant investment portfolio in many jurisdictions around the world, OMERS – through its employees or Directors -- may be asked to participate in the democratic process through political fundraising events.

OMERS participation in political fundraising will be in accordance with local laws. Where participation in an event with a political fundraising component is permitted by local law and is relevant to OMERS strategy or business, OMERS employees may only participate on behalf of OMERS with the approval of the Senior Executive Team (“SET”) member responsible for the Business Unit.

When in doubt, consult with the Vice President of Government Relations prior to making any donations.

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

**For the purpose of this Policy, OMERS refers to OMERS Administration Corporation (“OAC”) and its Business Units. It does not apply to portfolio companies.**

Next scheduled date for review:	December 2019
Frequency of review:	Every 3 years

## Political Donations

A political donation is the contribution of money, goods or services to a political party, election candidate, party leadership contestant, nomination contestant or constituency association.

In some jurisdictions, political donations by corporations are not permitted. In many jurisdictions, there are limits on the amount a corporation or individual can donate and specific reporting requirements. Political donation laws are complex and vary across jurisdictions. OMERS allows political donations only when made in compliance with applicable laws and this Policy.

All political donations made from OMERS in any location will be undertaken in a transparent and ethical manner that meets all applicable legal requirements. Prior to making any political donations you should consult with the Vice President of Government Relations, as failure to comply may result in fines, penalties and reputational damage.

## Personal Participation

OMERS employees and Directors may voluntarily participate in the political process as individuals, provided that such participation is conducted at their own expense as private citizens and does not create the impression that their views or their contributions are those of OMERS.

## Restrictions at the Canadian and Ontario Levels

In many Canadian jurisdictions, it is not permitted for OMERS and its Business Units to make political donations. This includes:

- at the national level in Canada;
- at the provincial level in Ontario; and
- at the municipal and school board level in Ontario.

Some other jurisdictions also prohibit political donations from being made by OMERS and its Business Units.

Consult with the Vice President of Government Relations prior to making any political donations.

## OMERS Participation

OMERS investment portfolio is diversified across many jurisdictions. Participation in the political process outside of Ontario in jurisdictions where investments are located may be necessary to ensure OMERS interests are considered as part of the democratic process.

### Participation in Events with a Related Business Purpose

In jurisdictions where OMERS is allowed to participate in political fundraising and subject to the approval processes set out in this Policy, OAC Directors and OMERS employees may participate in events where there is a political fundraising component such as dinners, sporting events or similar occasions organized to support a politician or political party, if the event is relevant to OMERS strategy or Business Unit and will advance OMERS interests.

There is no expectation that the OAC Board of Directors should conduct lobbying activities or political donation activities on behalf of OMERS.

### Entertaining Government Officials

Entertaining government officials is permitted subject to the standards set out in the *Code of Conduct and Ethics*.

### Use of Premises

OMERS will not use its corporate offices for any political fundraising activity.

### Restrictions During Election or Leadership Campaigns

In Canada, participation in events with political fundraising components cannot take place at the relevant level of government during a campaign for a general election, by-election or leadership of a political party.

### Required Approvals

The following approval is required before participation in political fundraising events:

- participation by OMERS employees is subject to the approval of the SET member responsible for the Business Unit;
- participation by a member of the SET is subject to the approval of the CEO;

- participation by the CEO is subject to the approval of the Board Chair; and
- participation by OAC Directors representing OMERS is subject to prior approval of the Board Chair and the CEO.

In addition to the above approval, any event involving the expenditure of more than 10,000 in any local currency must also be approved by the CEO.

## Transparency

All political donation expenditures made by OMERS must be made directly by the entity making the donation.

## Exceptions

There shall be no exceptions to this Policy.

## Responding to Incidents of Non-Compliance

The Policy Manager is responsible for identifying incidents of potential non-compliance under this Policy based on the established procedures and reporting such incidents to the Policy Sponsor.

## Monitoring and Reporting

### Board Chair

Whenever possible, the Board Chair will provide notice to OAC Directors of upcoming political fundraising events where an OAC Director is participating, to provide assurance that OMERS activities are coordinated and efficient.

### OMERS

The Vice President, Government Relations will make a recommendation to the Governance Committee at its first scheduled meeting each year, regarding OMERS enterprise plan and budget for political contributions in the coming year. At the same meeting, the Vice President, Government Relations will provide a report on contributions from the previous calendar year made by OMERS pursuant to this Policy.

Political contributions will be reported on the OMERS website annually.

### Business Units

Each year, the SET member responsible for a Business Unit will report to the CEO on all activities conducted under this Policy, by completing a Compliance Certificate which includes a summary of the political donation activity conducted by the Business Unit.

The SET member responsible for the Business Unit will provide a copy of the Compliance Certificate to the Vice President, Government Relations.

## ROLES &amp; RESPONSIBILITIES

Policy Approver	Governance Committee of the OAC Board	Responsible for approving the Policy
Policy Sponsor	Chief Operating Officer & Pension Services	Ultimately accountable for the Policy, including its 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	VP, Government Relations	Responsible for the monitoring, compliance and reporting functions of the Policy