

To ensure consistency, the following definitions/abbreviations must be used in all OAC policies and procedures:

Administered Funds	Assets managed by OMERS Enterprise on behalf of Ryerson, Transit Windsor and Hydro Guarantee Fund
Board Chair	the Chair of the OAC Board
Borealis	Borealis Infrastructure Management Inc. and any other entity responsible for managing the Plans' infrastructure assets
CEO	the President and Chief Executive Officer of the OAC, and where used with Borealis, OCM, OPE, OSI or Oxford, the respective President and Chief Executive Officer
CFO	the Executive Vice President and Chief Financial Officer of OAC
Chief Auditor	the Executive Vice President and Chief Auditor of OAC
CHRO	the Executive Vice President and Chief Human Resources Officer of OAC
CIO	the Executive Vice President and Chief Investment Officer of OAC
CLO	the Executive Vice President and Chief Legal Officer of OAC
CPO	the Executive Vice President and Chief Pension Officer of OAC
Custodian	the custodian of the Fund, currently State Street Bank and Trust Company
Director	a member of the OAC Board
Enterprise Senior Leadership Team	the Senior Leadership Team, the CEO of each Investment Entity and the President of OIM
ERM	Enterprise Risk Management
FSCO	the Financial Services Commission of Ontario
Funds	collectively, the Primary Plan Fund, RCA Fund, Supplemental Plan Fund and Administered Funds
HR	Human Resources
Investment Entity	each of Borealis, OCM, OPE, OSI and Oxford
IOA	Investment Operations & Applications
IRM	Investment Risk Management
IT	Information Technology
ITA	the <i>Income Tax Act (Canada)</i>
OAC	OMERS Administration Corporation
OAC Board	the Board of Directors of OAC
OCM	OMERS Capital Markets, a division of OAC
OFT	OMERS Finance Trust
OIM	OMERS Investment Management Inc.
OMERS	the retirement system that includes OAC, SC, the Plans and the Funds
OMERS Act	the <i>Ontario Municipal Employees Retirement System Act, 2006</i>
OMERS Enterprise	the people and entities involved in administering the pension and investment operations of OMERS, including OAC, the Investment Entities, OIM and OFT
OMERS Pension Plans or the Plans	collectively, the Primary Plan, the RCA and the Supplemental Plan

OPE	OMERS Private Equity Inc. and any other entity responsible for managing the Plans' private equity assets
OSI	OMERS Strategic Investments LP, a limited partnership
OWW	OMERS Worldwide, a brand under which the Investment Entities, OFT and OIM operate
Oxford	Oxford Properties Group Inc., OMERS Realty Corporation, and OPGI Management GP Inc., collectively the Oxford Group, and any other entity responsible for managing the Plans' real estate assets
OZONE	the OAC employee intranet
PBA	the <i>Pension Benefits Act (Ontario)</i>
Primary Plan	the OMERS Primary Pension Plan
Primary Plan Fund	the assets of the pension fund for the Primary Plan
RCA	the Retirement Compensation Arrangement for the OMERS Primary Pension Plan
RCA Fund	the assets of the fund for the payment of RCA benefits
RIM	the OAC Records and Information Management Program
SC	OMERS Sponsors Corporation
SC Board	the Board of Directors of SC
SC Members	Members of the SC Board
Senior Leadership Team	the CEO, CFO, Chief Auditor, CHRO, CIO, CLO, and CPO
Senior Management	the Enterprise Senior Leadership Team, all SVPs, and the VP Legal and Corporate Secretary, individually or collectively as the context requires
SIP&P	Statement of Investment Policies and Procedures
Supplemental Plan	OMERS Supplemental Pension Plan for Police, Firefighters and Paramedics
Supplemental Plan Fund	the assets of the pension fund for the Supplemental Plan
SVP	a Senior Vice President of OAC
TAC	OMERS Transaction Approval Committee
VP	a Vice President of OAC

## POLICY TERMS

The following terms apply to all OAC policies and procedures unless expressly stated otherwise in the policy or procedure. These requirements should therefore only be referred to in a policy or procedure when describing an exception from, or a requirement more stringent than, these provisions.

1. **Access to Policies** - OAC policies and procedures are accessible to all employees and Directors through the online Policy & Procedures Library on OMERS employee intranet (OZONE) or from Compliance, and amendments are communicated through periodic email distribution of *Policy News*.
2. **Compliance with Policies** - Employees must be familiar with and agree to comply with the policies and procedures that apply to them, including any amendments, as a condition of their employment.
3. **Sanctions for Violations** – Disciplinary action may be taken against any individual who violates policies or procedures. The appropriate sanction will be determined on a case-by-case basis in light of the facts and may include one or more of a warning, repayment of any benefit received, a reprimand, a suspension, a loss of entitlement to salary increase or bonus, a demotion or ineligibility for promotion, dismissal for cause or the initiation of civil or criminal proceedings.
4. **Policy Sponsor** - The sponsor is responsible for drafting, implementing, interpreting, monitoring and reporting on the policy or procedures and must approve any exceptions.
5. **Review and Updating** - Policies and procedures must be reviewed on a periodic basis as set out in the History section of the policy or as needed and are amended to reflect legislative or organizational changes or requirements.
6. **Business Records** - Records of all business activities relating to the policy or procedures are to be prepared and retained in accordance with the RIM policy.
7. **Escalation of Issues** – Where an employee encounters interpretation issues or violations relating to activities covered by a policy, the matter should be reported through the employee’s normal reporting line to his or her manager.
8. **Exceptions to a Policy** - In appropriate circumstances, an exception may be granted to any policy provision. The request must be made in writing and approved by the policy sponsor with compliance or legal consultation. Any material exception granted to a provision of a Board approved policy must be reported to the relevant Board Committee at the next scheduled meeting or as the Committee Chair directs.
9. **Mandatory, Recommended and Discretionary Language** – Where a policy uses the word “must” or “will”, the course of action is mandatory for the employee unless the employee’s manager approves a different course with the consent of the policy sponsor. Where the word “should” is used, the course of action is recommended and the employee is encouraged to follow but is not required to. Lastly, the word “may” is an enabling term and the course of action is in the discretion of the employee.

## DRAFTING GUIDELINES

The Policy Template provides standard formatting and minimum required sections to be used for all policies. Every page of the policy must include the last posting date. The *History* section at the end of the document sets out the effective date, approval dates of the original policy and any amendments, and the next targeted review date.

Each policy title must begin with one of the following category identifiers:

- “Board” – applies only to Directors;
- “Enterprise” – applies to OAC and Investment Entity employees and may include Directors;
- “Corporate” – applies to OAC employees in more than one business area;
- “OCM, IT or IOA” – applies to employees within that business area only.

The *Summary* section briefly describes the content and scope of the policy. If the policy requires Board or Committee approval this must be stated in bold in this section. Management approval is already indicated in the Sponsor line and should not be repeated here.

The Policy Definitions must be used in every policy and should not be redefined in the policy. Additional definitions and acronyms may be used within a policy to introduce new concepts or avoid repeating long titles or phrases, but should not be created for terms commonly used or readily understood from the context. Only defined terms and names should be capitalized.

Section titles and subtitles must be numbered (paragraphs are not) and should be used to separate topics (generally 3 or 4 titles per page – not for every sentence). Lists of items or criteria should be bulleted, not further sub-numbered.

Simple, concise language should be used. Avoid duplication of the same point, filler words (i.e. “certain”, “relevant”, “respective”, “proper”, “applicable” etc.) and legalese (i.e. Latin terms, contractual clauses or citation of legislation). Details of legal requirements addressed by the policy should be maintained in background files. The policy should describe what we do (i.e. how we comply with the law), not what the law requires.

Procedures that are directly related to the policy, including specific tasks that apply to a large group or reporting required for the Board or Senior Management, should be combined in the same document, either as a separate section or an appendix. Any forms, schedules, or guidelines referred to in the policy should also be attached as appendices. Where the policy or procedures require action by the OAC, the individuals or department having responsibility to carry out the tasks must be stated.

Links to related policies and key reference documents should be included as cross references at specific points in the policy (not listed at the end) if needed to avoid duplicating a provision that is stated elsewhere. The Policies and Procedures Library on OZONE provides five alternative ways of searching for other related policies online.