

**Policy Sponsor:** CPO and Public Affairs

**Summary:** Sets out guiding principles and Management’s strategic approach for the OAC’s communications; articulates the roles of the OAC Board and Directors in specific areas of the OAC’s communications relating to OMERS; and directs Management to develop and maintain communication and information strategies and programs, supported by appropriate policies and procedures. **This policy must be approved by the Governance Committee.**

### Contents

1. PURPOSE .....	1
1.1 Objective.....	1
1.2 Principles .....	1
2. COMMUNICATIONS PROGRAM .....	2
2.1 Communications Strategy and Tactical Plans.....	2
2.2 Key Audiences.....	2
2.2.1 Plan Participants .....	2
2.2.2 News Media .....	2
2.2.3 Sponsors and Stakeholders.....	3
2.2.4 Government .....	3
2.2.5 Pension and Investment Industry Leaders .....	3
3. INFORMATION PROGRAM.....	3
3.1 Scope of Information Program .....	3
3.2 Requests for Information Process.....	3
4. ROLES AND RESPONSIBILITIES.....	4
4.1 News Media Relations.....	4
4.2 Changes to the OMERS Brand .....	4
4.3 Participation at Conferences .....	4
4.4 Reputational/Service Satisfaction Research .....	5
4.5 OMERS Newsletters/Web Content .....	5
4.6 Government Relations.....	6
5. OVERSIGHT AND REPORTING .....	6
6. THE SC.....	6

## 1. PURPOSE

### 1.1 Objective

The central objective of all OAC communication and information activities is to build, promote and protect OMERS reputation as a leader in pension plan administration, governance and pension fund investing. Communication and information activities should be tailored to meet the needs of OMERS major audiences but are carried out under a set of key corporate messages relevant to all and articulated in strategies and programs developed by Management consistent with this policy.

### 1.2 Principles

Our communications and information strategies and programs are guided by the following principles:

- The OAC’s communication and information initiatives promote OMERS as a leader in the pension and investment industries in Canada and, where applicable, at a global level.

- The OAC's communication and information initiatives build awareness of the benefit of the OMERS Pension Plans and the value of OMERS as an investor.
- The OAC's communication and information initiatives are designed to both build positive reputation capital among all audiences and to reduce any potential reputation damage.
- The OAC will use communication initiatives to share the right information in an appropriate and transparent manner.
- OAC Management shall be professional and knowledgeable experts in both the pension and investment arenas and support the SC and the OAC Board by establishing and managing communications processes relevant to all communications activity.
- The OAC shall act consistently with the terms and conditions set out in the Framework Agreement which establishes the respective roles and responsibilities of both the OAC and the SC.

## **2. COMMUNICATIONS PROGRAM**

### **2.1 Communications Strategy and Tactical Plans**

On behalf of Management, Public Affairs develops and updates as required a multi-year Communications Strategy that defines the key corporate messages and employs a proactive approach to their delivery to all audiences. Adherence to these messages by all OAC communicators presents OMERS as a single and unified organization. There may be specific messaging to individual audiences depending on the need, but all messaging must be consistent with the corporate messaging. Public Affairs will consult with the communication teams at each of the Investment Entities and the Pension Division to ensure that there is no inconsistency with their communication initiatives focused on their business units.

A slate of communications tactics is also developed by Management outlining specific communications activities which are guided by the Communications Strategy and directed at the key audiences outlined below.

### **2.2 Key Audiences**

#### **2.2.1 Plan Participants**

Management designs, develops and delivers information and educational initiatives to support Plan participants (consisting of active members, retired members and employers) and to ensure broad understanding of the OMERS Pension Plans and the impact of the OAC's activities. Initiatives include in-person presentations, newsletters, a Members' Handbook, website and event packages. Responsive communication with Plan participants is provided through a well-established Call Centre. Requests for information from Plan participants must be managed in accordance with section 3 below.

#### **2.2.2 News Media**

A key aspect of the Communications Strategy is a proactive approach with the news media. Coverage by the news media will impact OMERS reputation in the eyes of all audiences. The OAC's voice should be assertive in its dealings with the media, promoting OMERS as a significant support to pensioners as a jointly sponsored, multi-employer pension plan and as a key participant in both the provincial and national economies, deserving of a voice at any table of influence related to the pension industry. An enhanced reputation will also support the OAC's reputation as an attractive investment partner and an employer of choice.

Management will maintain media monitoring and analysis to ensure OMERS reputation is safeguarded and in keeping with best practices for public and investor relations.

### 2.2.3 Sponsors and Stakeholders

General and targeted information sessions and exchanges, and other outreach, are held with stakeholders as required. The activity should be responsive, proactive where appropriate, coherent and aligned with the OAC's business goals and strategies. Requests for information from stakeholders are managed in accordance with section 3 below.

### 2.2.4 Government

Our communication with governments and regulators is intended to promote OMERS business interests by effecting changes to government and regulatory agendas favourable to OMERS and the pension industry and by leveraging and/or responding to legislative/regulatory reforms for OMERS benefit. OMERS should be positioned as a leader in the pension and investment fields and as an important partner, contributor and significant institutional investor in the Ontario and Canadian economies.

### 2.2.5 Pension and Investment Industry Leaders

A proactive communications approach to this audience is designed to promote OMERS reputation and position the OAC as a solid and reliable investment partner, an ally in the efforts to gain regulatory reform for defined benefit pension plans and an employer of choice. Communication with this audience involves a range of tactics including speeches and panel participation by key OAC experts at industry events, a quarterly newsletter from the CEO targeting industry leaders and focusing on developments at OMERS and its position on industry trends and issues, and other activities as appropriate. Activities at this level should be coordinated with the applicable Investment Entities to ensure alignment of messaging.

## 3. INFORMATION PROGRAM

### 3.1 Scope of Information Program

In addition to a proactive communication program, the OAC will use a clear and transparent information program to respond to requests for information from Plan participants, individual sponsors and stakeholder groups. The information program will provide appropriate information in a timely manner to meet the needs of these constituencies. Any distribution of information must be consistent with the OAC's statutory obligations as set out in the OMERS Act and the PBA, and consistent with the OAC's fiduciary duties. Information requests from the individual members and the general public are addressed through existing and contemplated processes, including but not limited to privacy and access policies and procedures intended to meet the OAC's obligations under applicable law.

### 3.2 Requests for Information Process

The SC, individual sponsors and stakeholder groups make requests for information from the OAC ("Requests") with respect to a wide range of OMERS activities from generally available public information with respect to the Plans, their investments, possible Plan design changes, the Supplemental Plan or other possible supplemental plans.

With respect to all Requests from all of these sources:

- Management shall respond to all reasonable Requests. When the OAC Board or a Director receives a Request from a Plan participant, sponsor or stakeholder, it must be forwarded to Management for response;
- Management will not respond to any questions or requests for information from a sponsor or any representatives of a sponsor during the Specified Plan Change process that the SC follows from March 1 of any year to June 30 of that year unless such request has been forwarded by PDIC or Management of the SC and shall provide written responses to either the PDIC or SC Management as directed.

- the response to any Request is subject to any legal or regulatory requirement, such as privacy laws which may limit the scope of a response or the ability to respond to the Request at all, and is subject to Management's discretion regarding demand on resources to fulfill the Request;
- any information provided directly by Management to a sponsor or stakeholder must be provided with appropriate disclaimers regarding its accuracy, timeliness and similar factors, and within appropriate defined limitations for its use;
- Management will assess whether the information requested would be useful for a broad constituency of stakeholders and sponsors, including retired members, and whether or not its costs, external and internal, should or could be paid from the Plans; and
- where there may be a reputational impact, Management shall keep the OAC Chair informed as required.

#### **4. ROLES AND RESPONSIBILITIES**

This policy articulates involvement or input of the OAC Board, its Committees and individual OAC Board members, whether to approve, review, or receive information, or to represent the OAC at public events.

##### **4.1 News Media Relations**

- OAC Board approval is required for the annual release of financial information and investment and pension service performance, other significant media releases identified by Management and communication with the news media on issues that involve potential reputational damage to OMERS.
- The Board Chair will respond to the media on matters involving the CEO.
- Management shall ensure that OAC Board members are provided results of daily media monitoring when items of interest to Directors are published.
- All other activity between the news media and the OAC is within the purview of Management.

##### **4.2 Changes to the OMERS Brand**

The OMERS brand, logo and word-mark (the "Brand") represents the face of OMERS. From time to time OAC Management reviews the Brand, assesses the extent to which it continues to reflect and support OMERS long-term direction and develops any changes to the Brand awareness strategy. This review is normally tied to OMERS long-term strategic planning process and involves a number of initiatives:

- Management determines the timing of and initiates any Brand review;
- the OAC Board provides input to the Brand review through OMERS strategy discussions and reviews new branding concepts recommended by Management;
- the OAC Board approves any changes to the Brand proposed by Management; and
- Management rolls out any changes to the Brand awareness which it communicates to the OAC Board for information.

##### **4.3 Participation at Conferences**

The OAC Board of Directors Mandate provides:

*"generally Board members will not make formal public presentations on behalf of OMERS without consultation with the [CEO and the Chair]. Such presentations are to be distinguished, however, from meetings that may routinely occur with the organizations or bodies that appoint individual Directors*

*where [the Director's] comments are limited to discussion of publicly available information consistent with the fiduciary duties of [Directors]."*

With respect to participation in all stakeholder and professional events, conferences and seminars:

- Directors may attend as OAC representatives or as individuals, at their discretion;
- OAC employees, as the experts and professionals engaged by the OAC Board, are designated to speak to technical matters with respect to OMERS; and
- Directors may chair or moderate panels in order to introduce OAC employees who are making presentations as OAC spokespersons.

With respect to participation in stakeholder events, conferences and seminars only:

- Directors may make presentations to organizations or bodies that appoint individual Directors, with comments limited to discussion of publicly available information consistent with the fiduciary duties of Directors; and
- Directors must use materials prepared by Management at such events, as required.

With respect to participation in professional events, conferences and seminars only:

- when a Director is represented as having any connection or association with OMERS, the Director must not make formal public presentations that are contrary to the interests of OMERS generally and the OAC in particular and must consult with the Board Chair to confirm that any presentation materials are consistent with OMERS interests;
- upon approval by the Board Chair to act as the OAC's spokesperson, the Director's presentation material must be prepared by or approved by Management;
- Directors may make presentations based on their business experience and background without approval of the Board Chair, provided that they are not representing the OAC and not using material prepared by Management;
- participation in the conference must be consistent with the Director Education Policy; and
- Management is responsible for establishing the appropriate involvement in investment and pension industry associations and related organizations where there are benefits in maintaining involvement for communications and professional purposes.

#### 4.4 Reputational/Service Satisfaction Research

Research is carried out on a regular basis by Management to assess OMERS reputation and service levels. Selected individuals representing clients of the Pension Division participate in satisfaction surveys designed to assess satisfaction with the services of the Pension Division. In addition, reputation research is carried out focusing primarily on external audiences to assess how OMERS is perceived by the news media, other leaders in the pension and investment industries, as an employer, and by government and stakeholder groups. In carrying out this research:

- Management determines the need for and frequency of reputational/service satisfaction research initiatives; and
- Management provides the OAC Board with regular reports on the results of this research, as well as any strategies designed to respond to the findings.

#### 4.5 OMERS Newsletters/Web Content

Management regularly communicates with Plan members through a series of newsletters distributed to active members, employers, and retired members. As well, Management maintains an external website for ongoing communication to these groups as well as other

audiences including sponsors and stakeholders, the investment community, the news media and the general public. In carrying out this form of communication:

- the Board Chair reviews and approves quotes to be attributed to him or her;
- the Board Chair approves any content related to changes in membership of the OAC Board; and
- Management approves all other content with the purpose of keeping key audiences informed as appropriate.

#### 4.6 Government Relations

Management maintains contact with government and regulatory authorities as required to implement the strategic plan and to advance OMERS business interests. In communicating the advancement of government relations:

- Management provides a report on government relations for discussion and review to the OAC Board where the activity is related to OMERS strategy and major business initiatives, or where there may be a reputational impact; and
- on occasion, a Director(s) may attend a meeting(s) with government or regulatory officials, if Management, in consultation with the Chair, decides it would be appropriate.

### 5. OVERSIGHT AND REPORTING

In concert with the responsibilities outlined above, Management shall report as follows:

Report	Frequency	To whom
Daily Media monitoring	As required based on content	OAC Board members
Media coverage summary	Annually	Governance Committee
Reputational research reports	Annually or as conducted	Governance Committee
Web site activity and statistics	Annually	Governance Committee
Requests for information	Annually	Governance Committee

### 6. THE SC

Management shall provide the SC with the contents of this policy for its information and provide support to the SC relating to corporate communication and Requests consistent with this policy. Management shall provide the SC with an annual summary report regarding Requests to assist the SC in its deliberations regarding issues of concern to sponsors and stakeholders.

#### HISTORY

Effective Date: September 21, 2011  
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