



1. PURPOSE

The purpose of the Public Service Pension Board of Trustees' (Board) Communication Policy is to:

- codify the Board's communication principles; and
- describe how the principles are met through the activities of the Board and its agents.

2. PRINCIPLES

The Board's communication principles are:

- to provide accountability and transparency, through the provision of information about the Board and the Public Service Pension Plan (Plan), to plan members, beneficiaries, Plan Partners and other relevant parties.
- all communications will be clear and concise, accurate and timely, accessible, and consistent. All communications will use plain language.

3. ROLES AND RESPONSIBILITIES

3.1 Public Service Pension Board of Trustees

General

The Board is responsible for establishing the Communication Policy and has the sole authority to amend it.

The Board Chair speaks on behalf of the Board. The Vice Chair will speak on behalf of the Board in the absence of the Chair. The Board Chair may delegate this role, as required, to the Vice Chair, staff or another Board member.

Trustees can speak on behalf of the Board with the prior approval of the Board. If trustees are speaking to the media or other parties but not acting on behalf of the Board, they should make it clear that they are doing so in a capacity other than as a trustee and that the information being provided is not information that the trustee is aware of only because he or she is a trustee.

Communication with Plan Partners

All Board materials are available to the Plan Partners, once they have been considered at a Board meeting, unless explicitly restricted by the Board. Standing restrictions include legal opinions and documents, appeals material and personal information of individuals. At each Board meeting, the Board will identify the materials, if any, that are restricted from sharing with the Plan Partners. Following each Board meeting, unrestricted materials may be provided to Plan Partners by individual trustees.

The Board Chair will write to the Plan Partners, on behalf of the Board, to inform them or request input on matters specifically identified by the Board.

Communication with Relevant Parties

Board materials may be shared with other relevant parties, once they have been considered at a Board meeting, with the prior authorization of the Board. Relevant parties include the group of unions referred to in article 4.1(d) of the Joint Trust Agreement, MLAs, and others as identified by the Board.

When material is provided to a Plan Partner by or on behalf of the Board it will be provided to both Plan Partners.

Communication with Other Public Sector Pension Plans

The Board Chair will prepare a written report to the Chair(s) of the College, Municipal, and Teachers' Pension Boards of Trustees on matters of mutual interest following each quarterly Board meeting.

Upon request, all Board materials are available to the College, Municipal, and Teachers' Pension Boards of Trustees, once they have been considered and decided at a Board meeting, unless explicitly restricted by the Board. Standing restrictions include legal opinions and documents, appeals material and personal information of individuals.

Notwithstanding section 6 of this policy, the Pension Board Secretariat may share information that would not otherwise be routinely available with other public sector pension plans provided the release of the information is approved by the Board Chair, Vice Chair or Executive Director.

Communication with Plan Members and Beneficiaries

The Board Chair, on behalf of the Board, will respond to all written communication from plan members and other interested parties. The Board Chair may delegate responses to the Vice Chair, the Executive Director or Pension Board Secretariat. The Pension Board Secretariat will respond to written communication which simply requires directing the member or interested party to publicly available information.

The Board may, as an issue warrants, prepare an issue-specific Board Communiqué or letter to all members. The Communiqué or letter may be distributed through a variety of methods including posting on the website, inclusion in the annual Member's Benefit Statement mailout, or through the member's employer.

Communication with Employers

The Pension Corporation (Corporation) prepares and distributes material to plan employers on behalf of the Board in accordance with this Communications Policy, the Service Delivery Plan and the Service Agreement.

Trustees' Personal Use of Social Media

The Board acknowledges that some trustees may use social media tools for personal or professional use in their capacity other than as a trustee of the Plan. Trustees will ensure that their online activity does not conflict with their fiduciary obligations, the Code of Conduct or this Communication Policy.

When posting on social media, trustees will not affiliate themselves with the Public Service Pension Plan. Trustees may forward documents through social media that are publicly available; however, in accordance with Board policy, may not comment on them.

Trustees who use social media tools for personal use will consider how it may affect the Plan and other Board members, recognizing that social media content is pervasive, often permanent and in many cases out of personal control once posted. Trustees will ensure that no material is posted to their personal pages or sites that could jeopardize the reputation of the trustees, the Plan or the Board.

Third Party Requests to Service Providers

Service Providers of the Board, including but not limited to the actuary, legal counsel, Plan Administrative Agent and Investment Management Agent, are occasionally approached by a third party to speak on matters related to the Plan. In this case, the service provider is asked to:

- first contact the Board Chair, through the Pension Board Secretariat, to obtain the Chair's authorization to speak to the third party on matters related to the Plan
- clearly establish with the third party and to the audience that the service provider does not speak on behalf of the Board
- confirm that the presentation content will entail general information but not matters that are specific or confidential to the Board, and
- provide copies of materials to be used for preview by the Board Chair.

The Chair will inform the Board when such authorization is granted.

Third Party Requests to Provide Information to Plan Members

The Board may approve a request from a third party to provide information to plan members if the following conditions are met:

- The Board remains in compliance with the *Freedom of Information and Protection of Privacy Act*, specifically section 32 on the use of personal information.
- In the opinion of the Board, the purpose and values of the third party are consistent with those of the Board and the Public Service Pension Plan.
- The information is not of a commercial or lobbying nature.
- The information does not directly or indirectly imply that the Board endorses a product, service or organization.
- Any direct costs to provide the information to plan members are not borne by the Public Service Pension Plan.
- New communication products and vehicles will not be created solely to disseminate third party information.

The Board will not charge a third party a fee for providing access to plan members through plan related communications products and vehicles, other than to recover any direct costs.

The Board may approve posting links to third party websites on the plan website subject to the criteria above.

3.2 Communications Committee

- The Communications Committee is responsible to approve the Board's operational communications plans and overall strategic communication plan. The Communications Committee is also responsible to review the following products and materials for recommended approval by the Board:
 - Annual Report
 - Report to Members
 - Trustee messages
 - Communications Strategy
 - Key messages
 - Board communiques
 - Any other communication material the Committee or Board determines should be approved by the Board
- The Committee has been delegated decision-making authority from the Public Service Pension Board of Trustees to review and approve the following:
 - GreenShield Pension Life Content
 - Trustee profiles
 - Report outlines
 - Website content changes when the change is not considered to be significant.
 - Report to Members in final layout
 - Annual Report in final layout with audited financial statements included

The Communications Committee may, at its discretion, delegate to the Corporation the approval of communications materials that are within the authority of the Committee to approve. The Communications Committee may undertake quality assurance reviews of published materials.

The Communications Committee gives direction to the Corporation with respect to communicating with plan members, plan employers and other relevant parties.

3.3 BC Pension Corporation

The Pension Corporation is responsible for drafting public communication products for the approval of the Board or the Communications Committee as appropriate. The Corporation is also responsible to draft, review and approve documents delegated to it by the Communications Committee.

The Corporation will ensure that draft material is reviewed for accuracy by plan administration, finance and policy staff, as applicable, before it is presented to the Communications Committee for review.

The Corporation is responsible, as the Board's agent, for producing and distributing the information required by law to members and their beneficiaries on termination, retirement or death.

The Corporation is responsible for producing and distributing, once approved by the Board, the annual Report to Members and the Annual Report of the Public Service Pension Plan as well as any other information the Board requests be distributed to members and/or employers.

The Board may use social media to disseminate information about the Public Service Pension Plan. The Corporation is responsible to manage the social media accounts for this purpose.

3.4 Employers

Plan employers are responsible for providing each member with the information supplied by the Pension Corporation to meet the requirements of the *Pension Benefits Standards Act*. Plan employers are also required to distribute, to active plan members, any other pension plan information supplied by the Corporation within the time limits specified.

4. EDUCATION AND OUTREACH

Communications will:

- raise awareness and educate key relevant parties on how BC public sector pension plans are funded, structured and managed
- engage relevant parties to help them feel confident about their continued involvement with the plans
- reassure relevant parties that the plans are well managed and sustainable in the long term
- raise the collective level of pension understanding and dispel myths; and
- advocate on behalf of the Public Service Pension Plan.

5. REGULATORY FRAMEWORK

The Plan is administered in accordance with the Public Service Pension Plan Joint Trust Agreement and various federal and provincial statutes, including but not limited to family, tax and privacy legislation, as well as the common law, and all communication activities of the Board will be administered in compliance with that legal framework.

6. ROUTINE DISCLOSURE OF INFORMATION

The Board makes the following information available on the public website or on the request of interested parties:

- the Board's foundation documents and policies: the Public Service Pension Plan Joint Trust Agreement, the Public Service Pension Plan Rules, the Statement of Investment Policies and Procedures, and the Funding Policy
- summary information about the Plan, the Plan's membership and investment holdings
- Public Service Pension Plan Annual Report, Report to Members, Plan Member Guide, appeals process and website content on a wide range of pension topics
- the names of the individuals on the Board and how to contact the Board
- highlights of each quarterly Board meeting including governance and benefit decisions.

The Board will make available, on request, any other document or information of the Board that is not protected due to its personal, legal or otherwise confidential nature.

7. CHECKLIST FOR DISCLOSURE OF BOARD INFORMATION

Trustees occasionally wish to share sensitive Board information with their constituents, appointing authorities, or colleagues on other pension boards. If a trustee wishes to share Board information that is restricted in accordance with this policy, the trustee must obtain prior approval to do so.

When in doubt, trustees should check with the Executive Director as to whether a document can be disclosed beyond the Board.

A standing agenda item at each quarterly meeting allows the Board to consider trustee requests to share restricted information. The following checklist is to facilitate the trustee requests.

- ☐ Has the material been reviewed by the Board? *If not, obtain Chair, Vice Chair or ED approval to share.*
- ☐ Does the material contain legal, personal or appeal information? *If yes, obtain Board approval to share.*
- ☐ Is the material marked “confidential” and produced by one of the agents? *If yes, obtain Chair, Vice Chair or ED approval to share. The Secretariat will also obtain the agent’s approval to share.*
- ☐ Is the material marked “Trustee Only” or “TO”? *If yes, obtain Board approval to share.*
- ☐ Is the material the subject of a current or future communications plan? *If yes, obtain Board approval to share.*

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