PUBLIC SERVICE PENSION PLAN

STATEMENT OF INVESTMENT POLICIES AND PROCEDURES

As Amended: September 1, 2026

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Section 1: Overview / Purpose

1.1 The purposes of this Statement of Investment Policies and Procedures (the "Statement" or "SIPP") are:

(i) To ensure compliance with the British Columbia *Pension Benefits Standards Act* ("PBSA"), as amended from time to time or replaced, the *Pension Benefits Standards Regulation* ("PBSR"), which requires a written statement of investment policies and procedures, as well as the *Income Tax Act*.

(ii) To set investment guidelines and direction for the British Columbia Investment Management Corporation ("BCI") that are consistent with the investment policies and objectives established by the Public Service Pension Board of Trustees (the "Board") for the Public Service Pension Plan (the "Plan").

(iii) To provide objectives, policies and principles for the management of the assets of the Public Service Pension Fund (the "Fund").

(iv) To set forth investment performance objectives and other criteria to be used by the Board to review and evaluate the investment results of the Fund.

1.2 The Plan is continued and maintained under the Public Service Pension Plan Joint Trust Agreement ("JTA") and the Public Service Pension Plan Rules (the "Rules"). The purpose of the Plan is to provide pension benefits to plan members in accordance with the benefit provisions of the JTA and the Rules.

1.3 The Board is responsible for the administration of the Plan and of this Statement. The members of the Board are the trustees of the Plan and the Fund.

1.4 The Board is responsible for ensuring that all investments of the Fund are managed prudently and in accordance with the PBSA, the PBSR, the *Income Tax Act,* and this Statement.

1.5 The Board has adopted this Statement after considering the benefit obligations of the Plan, the risk profile that the Board believes to be appropriate, and the maturity of the Plan.

1.6 The Board will review and confirm or amend this Statement at least annually, but it can be amended at any time by a Board resolution.

1.7 BCI is required to have more detailed investment policies and procedures that detail their specific mandate, and they will acknowledge that these policies and procedures conform to this Statement.

Section 2: Plan Structure and Funding / Plan Description

2.1 The Plan is a defined benefit final average earnings pension plan with contingent inflation adjustments. It is funded by Plan member and employer contributions. Benefit entitlement is based on the provisions of the JTA and the Rules.

The Plan is not subject to solvency tests but is required to meet the going concern funding requirements of the PBSA as these requirements existed prior to December 31, 2019.

2.2 The Rules establish three accounts for the Plan: a Basic Account, an Inflation Adjustment Account and a Supplemental Benefits Account.

2.2.1 The "Basic Account" provides the non-indexed portion of the pension, based on the provisions in the JTA and the Rules.

2.2.2 The "Inflation Adjustment Account" was established in 1982 and provides cost of living increases for retired members. The Inflation Adjustment Account is funded through a portion of ongoing contributions from employers and members, from investment income earned on its own assets, and from excess interest earnings in the Basic Account. Since its inception, the Inflation Adjustment Account has provided full indexing of members' pensions. However, this is not a guaranteed benefit. The increases as of January 1st each year are based on the annual change in the 12-month average Consumer Price Index ("CPI") for the period of November to October of the previous year and are subject to availability of funds in the Inflation Adjustment Account.

2.2.3 The "Supplemental Benefits Account" is a flow-through account, which has been established to provide for payment and funding of supplemental benefits (such as contributions and benefits) that exceed Income Tax Act (Canada) limits for registered pension plans and group benefits for retired members. Medical and extended health coverage for retired members is funded by employer and retired member contributions. The Supplemental Benefits Account has not been addressed by this Statement because it does not hold any investment funds.

Section 3: Plan Governance

3.1 In accordance with the JTA, the Board has at least 14 members with equal representation from Plan members and the employers.

3.2 The Board is responsible for the administration of the Plan and the management of the Fund. Specifically, the Board has the responsibility to

establish a written statement of the investment policies and procedures. The Board has a legal obligation to act in the best financial interest of the members and beneficiaries of the Plan and exercise a high standard of care in protecting the Fund and its assets.

3.3 BCI and the Plan Administrative Agent (British Columbia Pension Corporation) are agents of the Board. They must act in accordance with the direction and policies of the Board, subject to their fiduciary duty to the Plan members and beneficiaries.

3.4 The Board has a duty to understand environmental, social, and corporate governance ("ESG") issues and to manage these ESG issues through its oversight of BCI. BCI integrates ESG issues into its decision-making processes as governed by their *ESG Governance Policy*.

3.5 The Board meets quarterly with BCI to review performance and discuss investment issues. In addition, the Board appoints trustee members to the Interplan Investment Committee, which meets with BCI at least three times per year, and there are ad hoc meetings between the Board and BCI to pursue investment issues.

The reports set out in Section 8 are reviewed by the Board or committee of the Board.

As provided in Section 1.6, the Board annually reviews and updates its Statement.

At least once every three years, the Board, with professional support from BCI, conducts an Asset-Liability Review. This process includes a review of investment objectives and risks, and determines the asset allocation framework for the next period.

The Board considers BCI performance annually as part of its Governance Review process.

The Board has conducted a comprehensive Risk Management Review, which included an assessment of BCI's risk management activities. This review will be revisited annually, and a comprehensive Risk Management Review will be undertaken periodically.

3.6 The Fund is managed by BCI and other investment management firms contracted through BCI. In all cases, BCI and other investment managers will comply with this Statement, their internal policies, as well as the relevant laws and regulations governing pension fund management in the respective jurisdictions.

3.7 The Board delegates its voting rights to BCI. Voting rights will be exercised in the best financial interests of the Fund and in alignment with the Board's

SIPP. BCI shall vote proxies in accordance with BCI's *Proxy Voting Guidelines*.

3.8 The following outlines the roles and responsibilities of parties involved with the Plan:

BCI:

- is an agent of the Board, and is responsible for day-to-day investment management of the Fund;
- ensures the Fund is managed in accordance with this Statement and the directions of the Board;
- hires and manages contract arrangements with the Custodian and other external providers of related services (e.g., external managers and data service providers) on behalf of the Board and as trustee of pooled funds. BCI's oversight of external public equity managers includes their hiring, monitoring and termination; analysis of their results, processes, organizational changes; and client needs. Legal obligations are set out in BCI's Investment Management Agreements with each external equity manager;
- is responsible for fulfilling all reporting requirements outlined in Section 8 of the Statement; and
- has a role that goes beyond that of a typical fund manager, effectively functioning as the Board's internal investment staff. This is set out in greater detail in the Board's Funds Investment and Management Agreement with BCI.

Custodian:

- responsible for fulfilling all their duties as outlined in their service agreement with BCI; and
- fulfills the regular duties of a Custodian as required by law.

Auditor:

- audits the Plan's financial statements in accordance with existing legislation and Canadian Accounting Standards; and
- provides an opinion on the financial statements.

Actuary:

- responsible for assessing the financial status of the Plan, including the adequacy of contribution rates; and
- fulfills the regular duties of an Actuary as required by law.

British Columbia Pension Corporation ("Pension Corporation"):

- is an agent of the Board and is responsible for ensuring contributions and payments are made in accordance with the Rules;
- prepares financial statements, annual reports, and other Plan documents;

- establishes and manages contracts with external administrative service providers on behalf of the Board; and
- has a role that goes beyond that of a typical administrative agent, effectively functioning as the Board's internal staff. This is set out in greater detail in the Board's Service Agreement with Pension Corporation.

Section 4: Asset Allocation

4.1 Meeting the pension benefits promise is the primary objective of the Board. Providing CPI-level increases on the sustainable indexing basis, stabilizing the contribution rates by adjusting or establishing a rate stabilization reserve, and providing other non-guaranteed benefits, such as providing benefit improvements or reducing the basic contribution rates, are additional objectives of the Board. The Board's risk appetite is expressed through its investment objectives and corresponding risk tolerance levels. To achieve these objectives, the Board has adopted the following long-term asset mix and allowable ranges, shown in Section 4.2.

4.1.1 The Board identified the following risk tolerance levels during the Asset-Liability Review completed in 2025:

- A basic account contribution increase of no more than 2%; and
- Provide sufficient liquidity to enable the Plan to meet all its obligations as they become due, with a target Liquidity Coverage Ratio ("LCR")[1] of at least 15 months and a risk tolerance of at least 12 months.

[1] The Liquidity Coverage Ratio represents the ratio of liquidity supply over demand and measures the ability to fulfill payment obligations over the following year, under the assumption of stressed market conditions. It is expressed in months.

4.2 Policy asset mix, policy ranges and benchmarks for the Fund, effective February 1, 2026 are:

Asset Class[2]	Policy Range (%)		Policy Asset Mix (%)	Benchmarks
	Minimum	Maximum		
Short Term[3]	0	7	2	50% Canadian: FTSE 91 Day T-Bill Index 50% US: ICE BofA US 3-month T-Bill Index
Government Bonds[3,4]	14	31	23	80% FTSE Canada All Government Bond Index, plus 20% FTSE Canada Short Term Government Bond Index
Credit[3,5,6]	8	26	17	25% [50% Investment Grade: ICE BofA US Corporate Index, hedged to the Canadian dollar, plus 50% High Yield: ICE BofA BB-B US Cash Pay High Yield Constrained Index, hedged to the Canadian dollar], plus 25% [ICE BofA 1-3 Year US Corporate Index, hedged to the Canadian dollar + 60 bps], plus 50% Morningstar LSTA US Leveraged Loan 100 Index, hedged to the Canadian dollar
Fixed Income Sub-total	25	52	42	
Developed Market Equities[7]	5	30	15	20% S&P/TSX Composite Index, plus 80% MSCI World ex-Canada Net Index
Emerging Market Equities[8]	-	8	3	MSCI Emerging Markets Net Index
Private Equity[6,9]	10	23	18	MSCI ACWI Net Index + 200 bps
Equity Sub-total	23	54	36	
Real Estate[3,6,10]	10	30	20	25% [50% Investment Grade: ICE BofA 1-3 Year US Corporate Index, hedged to the Canadian dollar, plus 50% High Yield: ICE BofA 1-3 Year BB-B US Cash Pay High Yield Constrained Index, hedged to the Canadian dollar + 25 bps], plus 75% Cost of Capital of 6.8% in nominal Canadian dollar terms
Infrastructure and Renewable Resources[6,9]	7	23	17	Cost of Capital of 6.5% in nominal Canadian dollar terms
Real Assets Sub-total	25	50	37	
Other[11]	0	5	0	N/A
Sub Total	100	120	115	
Portfolio Leverage[12]	0	-20	-15	
Total Portfolio	100	100	100	

[2] Refer to Participating Pooled Funds table (Appendix A) for asset classification by pool.
[3] For performance measurement purposes, the benchmark proportion within the asset class will be set to actual due to the phased implementation of private market assets.
[4] The Government Bonds asset class includes Short Term Government Bonds and Government Bonds.
[5] The Credit asset class includes Corporate Bonds and Private Debt.
[6] Due to the illiquid nature of these assets, the upper limit may be exceeded on a temporary basis. BCI will use cashflow to rebalance as soon as is practical.
[7] Developed Market Equities includes Canadian and Global Equities and may include exposure to emerging markets.
[8] Emerging Market Equities may include exposure to developed markets.
[9] In addition to equity, investments may include debt (other than that held in the private debt strategies.
[10] Real Estate includes Real Estate Equity and Real Estate Debt (Mortgages).
[11] Other" includes strategies or investments that do not correspond to the listed asset classes. Refer to Appendix A.
[12] Assets held within The Funding Program will be benchmarked against their respective asset class benchmarks.

4.3 The Board recognizes that an appropriate implementation period is required to transition to the new policy asset mix identified in Section 4.2.

4.4 If any liquid asset class moves outside of its policy range at any time, BCI shall notify the Board of the breach at or before the next meeting of the Board, and outline the steps taken to bring the Fund's asset mix back into compliance.

4.5 The Fund may be invested in the pooled funds listed in Appendix A, segregated funds, mutual funds, unit trusts, limited partnerships and similar vehicles, provided that they conform to this Statement. Despite any other provision of this SIPP, the Board agrees to participate in the Principal Credit Fund and the Global Partnership Fund.

4.6 The Fund may loan its securities, or participate in pooled funds that lend securities provided that:

- The loan is secured by collateral that has a market value at least equal to or greater than the market value of the loaned securities;
- the securities lending agent provides an indemnity for losses relating to a borrower failing to return securities on loan;
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- the loan and collateral are valued daily on a "mark-to-market" basis; the loan and collateral meet the terms and conditions of BCI's Securities Lending Program.

4.7 The total asset mix may sum to greater than 100 per cent as a result of the inclusion of leverage at the Fund level. For performance measurement purposes the liability benchmark is equal to the realized cost of financing such liabilities.

4.8 The Board has adopted a foreign currency hedging policy that aligns with the hedging parameters of the BCI pooled funds in which the Plan is invested.

Section 5: Asset Class Policies

The following asset classes are permitted to be held in the Fund, subject to the investment policies established below for each asset class and the constraints imposed by the PBSA, the PBSR and the *Income Tax Act*, as outlined in Appendix B.

5.1 **Short-Term Policies**

5.1.1 Short-term includes money market instruments and bonds with a term to maturity of 15 months or less, unless it is a callable bond which has a high probability of being called within 15 months.

5.1.2 Corporate money market securities should be rated A-1 (Low) or better by Standard & Poor's ("S&P") or have an equivalent rating

from another credit rating agency.

5.1.3 Short-term corporate bonds should be rated A- or higher by S&P or have an equivalent rating from another credit rating agency.

5.1.4 Up to 1 percent of short-term holdings can be in non-rated debt issued by financial institutions (e.g., credit unions).

5.2 Government Bonds and Credit Policies

5.2.1 Government Bonds include fixed income securities issued or guaranteed by the Government of Canada, Canadian provinces or municipalities, Canadian government-related entities, or the Government of the United States, and Canadian dollar denominated fixed income securities issued or guaranteed by sovereign governments or supranational entities.

Credit shall consist of, without limitation, international and domestic corporate bonds, convertible bonds, equities, senior and subordinated debt, private debt, asset-backed commercial paper and securities, exchange-traded funds, and fixed income derivatives (e.g., futures, options, swaps).

Equity securities in the Principal Credit Fund and Investment Grade Private Credit Fund[13] derived from the conversion of fixed income securities, related derivatives, or restructuring of the original credit investment will immediately be reviewed to determine whether to sell the security immediately or hold to sell at a more appropriate time.

5.2.2 Publicly traded fixed income securities from issuers, other than securities issued by governments within Canada and securities held within the Corporate Bond Fund or Principal Credit Fund, when purchased must be rated BBB- or higher by S&P or have an equivalent credit rating from another credit rating agency. If any holdings are downgraded to below a BBB- rating, BCI shall immediately review the downgraded security and determine whether to sell this security immediately or hold to sell at a more appropriate time.

5.2.3 The Government Bond Fund and the Short Term Bond Fund must be managed within ±20 percent of the duration of their respective performance benchmarks.

[13] Investment Grade means an investment that has a credit rating of "BBB-" or better by Standard & Poor's or an equivalent credit rating from another rating agency or from BCI's internal Investment Risk team for investments that are not publicly rated.

5.3 Public Equity Policies

5.3.1 Equity investments consist of common and preferred shares, common stock equivalents, income trusts, exchange-traded funds, depository receipts, and equity derivatives (e.g., futures, options, equity swaps).

5.3.2 Investments in equity private placements are permitted as part of the public equity allocation policy limits as set out in Section 4.2.

5.4 Private Equity Policies

5.4.1 Private equity investments will typically consist of long-term debt or equity investments that are made primarily outside of the public market. These are long-term commitments made on behalf of the Fund.

5.5 Real Estate Policies

5.5.1 Real estate equity investments may include participation in externally managed funds (e.g., limited partnerships), direct real estate holdings, and/or securities (including debt securities) of real estate companies. Besides traditional real estate asset investments, the program may include alternatives and real estate-related investments, such as property technology companies and businesses ancillary to real estate and real estate investments (e.g., real estate investment management and service companies).

5.5.2 Real estate equity investments will be well diversified by property type, property location, and property risk.

5.5.3 No debt will be assumed or created if, as a result, it caused the debt to market value of the real estate equity portfolio to exceed 55 percent.

5.5.4 The real estate debt portfolio will consist of a broad range of mortgage products, diversified by geographic location, type of mortgage, size of mortgage, and type of real estate. It may include direct mortgage loans and mortgage instruments (e.g., mortgage bonds) as well as real estate loans, real estate-related debt and equity investments, and equity interest in QuadReal—BCI's external manager for its real estate equity and real estate debt classes. The aggregate exposure to equity investments of all participants in the BCI QuadReal Real Estate Debt Program (not including an equity interest in QuadReal) including preferred equity, and Structured Securities with a Structured Finance rating below BBB- by Standard & Poor's or an equivalent Structured Finance credit rating from another credit rating agency, may not exceed five percent of the net asset value of such program. All mortgage loans must be eligible investments under the PBSA and PBSR.

5.5.5 No debt will be assumed or created if, as a result, the Leverage Ratio would exceed 40 percent of the gross asset value of the BCI QuadReal Real Estate Debt Program.

5.6 **Infrastructure and Renewable Resources Policies**

5.6.1 Infrastructure and Renewable Resource investments consist of tangible long-life assets with potential for strong cash flows and favourable risk-return characteristics that provide an attractive match with pension liabilities.

5.6.2 Infrastructure investments typically include physical assets that provide essential services such as utilities and transportation systems.

5.6.3 Renewable Resource investments will typically consist of timberland, farmland, and energy production assets such as wind and solar.

Section 6: Use of Derivative Instruments

6.1 **The use of derivatives is only permitted for the following purposes:**

(i) Synthetic Indexing – Passively investing in an attempt to replicate the returns of an index.

(ii) Risk Control – Managing interest rate, equity, credit, currency, legal or tax risk through the use of hedging strategies.

(iii) Lower Transaction Costs and Liquidity Management – Reducing the transaction costs on trading, custody and brokerage costs through use of index futures. Substituting one combination of securities for another with the same net exposure to market variables for the purposes of exploiting pricing inefficiencies.

(iv) Asset Mix Shifts – Reduce market movement and transaction costs of shifting asset weights or rebalancing by allowing instantaneous implementation of the shift through derivatives.

(v) Their use through participation in the Global Quantitative Active Equity Fund, The Funding Program and the Global Partnership Fund.

6.2 All derivative uses are to be structured to ensure that the aggregate amount of market exposure of the Fund does not increase as a result of derivative transactions, except as expressly permitted by the Pooled Fund Product Descriptions for the Global Quantitative Active Equity Fund, The Funding Program and the Global Partnership Fund.

6.3 Derivatives include forward contracts, futures, options, and swaps. These derivatives can have equities, fixed income, interest rates, and

currencies as underlying instruments.

6.4 When entering into a new Over-the-Counter ("OTC")[14] derivatives transaction, BCI's direct Derivatives Counterparties must be financial institutions rated "A-" or higher by Standard & Poor's or have an equivalent credit rating from another credit rating agency. Notwithstanding the restriction above, new OTC derivatives transactions with a downgraded (below A-) Counterparty are permitted if such transactions would fully or partially offset an existing exposure with the Counterparty, leading to a reduction in BCI's net exposure.

6.5 The use of any additional derivative products other than those stated above will require the prior written consent of the Board.

Section 7: Use of Leverage[15] and Permitted Borrowing

7.1 The use of leverage involves borrowing against assets to amplify exposures for a given amount of capital.

7.2 Leverage may be used for the purpose of managing risk and/or enhancing returns. Leverage can magnify actual returns beyond those experienced by the underlying securities, both on the upside and downside.

7.3 Leverage will be used in accordance with the policy asset mix set out in Section 4 of the Statement and may be employed at the Fund level and within pooled funds as consistent with BCI's pooled fund policies.

7.4 The long-term policy asset mix includes leverage that can be created through the funding program pool by utilizing (i) secured borrowing such as repurchase agreements and/or (ii) the issuance of unsecured debt. Other forms of leverage could be created within the various pooled funds utilizing other sources such as derivatives (as outlined in Section 6) or embedded leverage.

7.5 When using leverage, consideration should be given to associated risks including liquidity, counterparty, and operational.

7.6 The use of leverage is tested against the Plan's current and/or projected liabilities to assess whether funding obligations are met under a range of potential outcomes, including downside/tail scenarios.

7.7 Periodic reporting is required for leverage. The reported metrics provide

[14] Over-the-Counter derivatives (or OTC derivatives) are derivatives contracts that are traded directly between BCI and derivatives counterparties without going through a central clearing counterparty, exchanges, or any other intermediary.

[15] **Asset mix leverage** is equivalent to portfolio leverage in the policy asset mix and involves leverage taken through participation in the Funding Program. **Financial leverage** includes asset mix leverage, plus other forms of recourse debt and secure funding. **Economic leverage** includes financial leverage, plus various off-balance sheet exposures (e.g., synthetic leverage via derivatives activities).

details on the various forms of leverage (e.g. asset mix, financial, and economic) and the associated risks to ensure compliance with the limits set out in Section 4 of the Statement and BCI's pooled fund policies.

7.8 The Fund's use of leverage may result in commitments for which the Fund could retain liability even upon withdrawal, within pooled funds as consistent with BCI's pooled fund policies.

7.9 BCI may use longer-term borrowing to achieve clients' desired leverage. Due to the illiquid nature of some of these instruments, asset class policy limits may be breached on a temporary basis. BCI will rebalance as soon as is reasonably practical.

Section 8: Performance Objectives and Reporting

8.1 The long-term (30 years) investment objective of the Fund is to meet or exceed, net of all expenses incurred in the investment process:

(i) the annual rates of return used in the actuarial report (CPI + 3.5 percent and 6.00 percent nominal); and

(ii) the benchmark portfolio's rate of return, which is the rate of return that would have been achieved if the Fund had held its policy asset mix and each asset class had earned the return of their respective benchmarks as outlined in 4.2.

8.2 The volatility of the Fund's rate of return over 5-year periods, as measured by standard deviation, is expected to be less than the volatility of the benchmark portfolio's rate of return.

8.3 The primary investment return objective of individual asset classes is for the rate of return, net of all expenses incurred in the investment process, to meet or exceed the respective benchmarks over 5-year periods. Certain asset classes (e.g., real estate, private equity, infrastructure, and renewable resources) do not lend themselves to good market indices, and it is more appropriate to evaluate their performance over longer periods such as 10 years. The benchmarks used for each asset class are listed in 4.2.

The overall long-term strategic asset mix includes leverage, investments in private markets and investments in public markets with limited liquidity. The Board recognizes that an appropriate implementation period is required to transition to the strategic asset mix and to implement the long-term allocations.

As a temporary measure, during this transition phase, private market assets will increase incrementally each year, offset by temporarily higher public market allocations. During this time the minimum and maximum ranges around the asset classes may be wider to facilitate the transition to the strategic mix. When the transition to the strategic mix is completed, or

near completion, the ranges around the benchmark weights may be reduced.

8.4 The returns of the Fund are calculated using market values derived from independent pricing sources. Returns are time-weighted so that cash flows have a minimal effect on return numbers. All income is included on an accrued basis. Return calculations are in accordance with industry standards. This includes using internal rates of return for private equity and similar type investments.

8.5 The return from foreign benchmarks applicable to asset classes will be calculated in Canadian dollar terms on an unhedged basis.

8.6 Each quarter BCI will provide the Board with reports on the performance of the Fund. These reports will include the following information:

- net cash flows;
- Fund values;
- investment returns for the total Fund and individual pooled funds as well as all stated benchmarks;
- portfolio leverage;
- signed compliance certificate confirming compliance with this Statement; and
- investment management fees (including external manager fees, custodial, legal, and audit fees).

The compliance certificate will report any breaches of this Statement as well as any material breaches of BCI's internal pooled fund policies.

8.7 The Board will compare the pooled fund's investment performance relative to the appropriate benchmark, and where appropriate will compare actively managed asset classes to a universe of managers with similar mandates, at least once a year. It is recognized that manager universe comparisons must be interpreted with caution, as there can be key differences in the nature of the portfolios (e.g., size) included in the universe. BCI will advise the Board quarterly of the portion of total public equities and of each equity asset class that are managed under active, indexed, and enhanced indexed strategies. BCI will advise the Board quarterly of the return of each equity asset class relative to its policy benchmark.

8.8 At least annually, BCI will provide 5-year and 10-year attribution analysis, reflecting the key drivers of the Fund performance relative to its benchmark. It will be published once sufficient data is available to ensure a comprehensive and accurate assessment. The report will also include a comparison of the volatility of the Fund's rate of return over a 5-year period, as measured by standard deviation, against the volatility of the benchmark portfolio's rate of return.

8.9 BCI will advise the Board quarterly of the diversification of the real estate

equity and real estate debt pools in which the Fund participates, advise the Board annually of the diversification of the private equity pools in which the Fund participates, and also provide updates (as applicable) on investment strategy for the next quarter and key changes in investment personnel.

8.10 The Pooled Fund Product Descriptions provide a detailed explanation of the valuation of each investment. Any material change to the Pooled Fund Product Descriptions is reported to the Boards.

8.11 Notwithstanding Section 8.7, real estate equity, private equity, and infrastructure & renewable resources programs may not be valued quarterly due to cost and complexity of valuation. At least once a year, BCI will provide the Board with a report examining the performance of the pools in which the Fund participates.

8.12 At least once a year, BCI will provide the Board with an update on BCI's Responsible Investing activities as outlined in Section 11.15.

8.13 BCI will inform the Board of any substantial change in the investment policy underlying any pooled fund in which the Fund is invested.

8.14 BCI will report to the Board on any changes to its securities lending policies.

8.15 The Board shall monitor BCI's performance and, if necessary, take steps as deemed appropriate to address any concerns. Concerns may include, but are not limited to, the following:

- performance results, which over a reasonable period of time, are below the objectives stated in Section 8;
- changes to BCI's or a sub-advisor's organization, investment personnel, or investment process, which might adversely affect the performance of the Fund;
- legal or regulatory proceedings against BCI or a sub-advisor; and/or
- failure to adhere to this Statement.

Section 9: Risk Management

9.1 The Plan's investment strategy should be developed to achieve the objectives outlined in the SIPP while minimizing the likelihood that the associated risk tolerances are breached.

Risks to these objectives include economic and demographic factors, and a variety of investment risks (e.g., asset returns; market, liquidity, credit, currency, counterparty, and concentration risk; leverage). The primary tool for managing these risks over the medium to long term is the Asset-Liability Review, which considers the following in setting the investment strategy:

- The Plan's characteristics and circumstances (e.g., liability profile, funding policy, demographics);
- The Plan's investment objectives and risks; and
- Capital market expectations.

Over the short to medium term, investment risks are managed per BCI's investment risk management framework, which includes the following elements:

- Integrated governance approach;
- Assignment of roles and responsibilities;
- Definition of key investment risks; and
- Associated measurement, monitoring, and reporting.

9.2 The Board or Pension Corporation will inform BCI at least annually of anticipated liquidity requirements. The Fund will maintain sufficient liquidity to meet its financial obligations as they come due. Temporary overdraft is permitted for day-to-day portfolio and cash management purposes, if it is considered to be in the best financial interest of the Fund.

Section 10: Valuation of Assets

10.1 As a general rule, all investments should be priced based on external sources. However, in some cases, obtaining market pricing may be prohibitively expensive (e.g., certain illiquid investments such as real estate and private equity). These assets will be valued at least once a year.

10.2 Any assets that cannot be marked-to-market on a regular basis (e.g., real estate and private equity) shall have their value determined in accordance with the valuation policies established by the managers, in accordance with standard industry practices. These values will be reviewed by BCI.

Section 11: Responsible Investing

Fiduciary Framework

11.1 The Public Service Pension Board of Trustees defines responsible investment as the ongoing consideration of all environmental, social and governance (ESG) factors, alongside other considerations including financial, geopolitical, and economic factors and portfolio construction techniques, in the investment analysis and decision-making process.

11.2 At all times, Responsible Investing will be conducted within the framework of fiduciary responsibility. It will therefore be implemented in a manner that supports the efficient investment of the Fund to achieve its investment return objectives, which are in the best financial interests of the Plan's members and beneficiaries.

11.3 In keeping with the Board's fiduciary responsibilities and framework, the Board believes that ESG issues can affect investment performance to varying degrees across companies, sectors, regions, asset classes and through time, across all stages of the investment process; and, that they can represent both opportunity and risk to the Plan.

11.4 ESG and Climate Change are long-term material systemic risks to the Plan. Actions to reduce greenhouse gas emissions to combat climate change, improve ESG practices through investor stewardship, select assets, and advocate for appropriate public policies have a direct and indirect positive impact on the plan. Climate change responses create investment opportunities, which the Board and BCI have a responsibility to consider. It is consistent with the Board's fiduciary duty to act in the best financial interest of members and beneficiaries, and consider wider stakeholder views and good corporate citizenship in its investment decision making.

Responsible Investment Beliefs

11.5 The Board believes that entities will tend to have better risk-adjusted returns and improved alignment between corporate, investor and broader stakeholder interest if they practice the following:

1. **Strong Corporate Governance:** Good governance practices support stronger long-term performance and enhance shareholder value. A high performing diverse board with a good balance of skills, expertise, and independence is critical to achieving long-term success.

2. **Strong Environmental Stewardship:** Entities that take measures to protect the environment, ensuring compliance with environmental regulations, and are efficient users of resources are better positioned to add long-term value.

3. **Responsible Treatment of Workers and Communities:** Entities that provide fair wages, benefits and working conditions, and allow for participation of stakeholders in the growth of the entity are more apt to create long term value for investors and achieve long term success.

4. **Transparency and Disclosure:** Entities that are transparent and disclose all relevant and material information, enhance assessment and management of ESG risks and opportunities.

11.6 **Active Ownership:** By being an active owner, we take action either directly or through our investment agent to steer entities in which we invest toward aligning with our beliefs. We also work with our investment agent to actively exercise our shareholder voting rights with the entities in which we invest.

11.7 **Policy Advocacy:** Public policy and financial market regulation have an

important impact on long-term investment returns. The Board or its agents individually or in collaboration with other investors will promote public policies that support the generation of adequate long-term investment returns and strengthen the fair and transparent regulation of financial markets. Public policy will support improved investment opportunities in the areas of ESG.

Board Activities

11.8 The Board recognizes that effective research, analysis and evaluation of ESG issues is a fundamental part of assessing the value and performance of an investment over the long term.

11.9 Through its work with like-minded partners, the Board will assess opportunities, and may join a consortium of asset owners and or investment agents that seek to influence ESG issues that align with the Board's guidelines for joining investor collaborations.

11.10 At least once per year, the Board will review the information provided by BCI in section 11.15.

11.11 At least once every three years, the Board will review its responsible investment beliefs.

BCI Activities

11.12 Pursuant to the Board's investment premises and subject to Section 11.2, favourable consideration is to be given by BCI and its investment managers to investment opportunities in corporations that meet or exceed all environmental regulations and aspire to reduce the impact of their operations on the environment, apply best practices for corporate governance, adopt good standards of safety and employee welfare, and are responsible in their operations by effectively managing relationships with suppliers, customers and communities.

11.13 The Board expects BCI to use its position as a fiduciary and universal owner to use proxy voting and shareholder engagement to encourage companies to focus on long-term value creation and manage ESG risks. BCI's engagement activities are based on strategic ESG priorities and, as a result, ESG matters are addressed to the extent that they influence risk and return. Through its work with like-minded partners BCI may join a consortium of asset owners and/or investment agents that seek to influence ESG issues.

11.14 As an active and engaged investor, BCI expects and encourages the companies within its portfolio to:

- comply with the laws of the jurisdiction within which they operate;
- aspire to align their practices and adhere to international standards;

- apply best practices for corporate governance and be transparent about their practices, risks, and opportunities;
- meet all environmental regulations and seek to reduce their operational impact on the environment; and
- be responsible in their operations, adopt good standards of occupational health & safety, and effectively manage stakeholder relationships.

11.15 At least once per year, BCI will provide the Board with the following:

- copies of its corporate governance, shareholder and proxy voting guidelines, and any updates;
- updates on BCI's ESG Strategy including influence priorities, and BCI's views with respect to ESG issues; and
- updates on BCI's activities and outcomes with respect to ESG issues, including outcomes on proxy voting records.

Section 12: Conflict of Interest and Code of Ethics

12.1 BCI's Code of Ethics and Professional Conduct

BCI employees, contractors, secondees, interns and board of directors (the "Covered Parties") are subject to *BCI's Code of Ethics and Professional Conduct* (the "BCI Code"). The BCI Code establishes standards that are at least as stringent as the CFA Institute's Asset Manager Code of Professional Conduct. The BCI Code includes a comprehensive and thorough conflict of interest policy (i) prohibiting Covered Parties from using their knowledge of the Fund's investments, or of investment decisions made on behalf of the Fund, to benefit anyone other than the Fund, and (ii) requiring applicable Covered Parties to make disclosure if they, or any person over whom they have influence, may be reasonably thought to materially benefit by an investment of the Fund or by an investment decision made on behalf of the Fund.

12.2 Procedure on Disclosure of Conflict of Interest

Covered Parties are required to report any actual or perceived conflict of interest to BCI's Compliance Department. To protect the integrity of any ongoing conflict of interest investigation, BCI will make disclosure to the Chair of the Board, as applicable, upon completion of its internal compliance investigation.

Disclosure by BCI should also be made at the first Board meeting following disclosure to the Chair. BCI's obligation to disclose any actual or perceived conflict of interest is engaged whether any such conflict is identified by a Covered Party or through BCI's internal compliance investigations.

12.3 Related Party Transactions

The Plan shall not directly or indirectly enter into a transaction with, lend the moneys of the Plan to, or use the moneys of the Plan to hold an investment in, a related party that is prohibited under Schedule III of the federal Pension Benefit Standards Regulation, 1985 (the "Federal PBSR"). The term "related party" has the meaning given in Schedule III of the Federal PBSR. However, a transaction with, loan to, or investment in a related party to the Plan is permitted if the value is nominal or immaterial to the Plan. In assessing materiality of the transaction with, loan to, or investment in a related party, a value of 1% of the market value of the Plan assets is considered to be nominal. Two or more transactions with the same related party shall be considered a single transaction.

Section 13: Implementation

The Board has decided to implement the investment policy through investments managed by BCI in accordance with Sections 4 and 8. The pooled funds in which the Board has agreed to participate are listed in the attached Appendix A. By participating in a particular pooled fund, the Board acknowledges that it has reviewed the pooled fund's internal investment policy and finds it acceptable. If BCI makes any material change to the investment policy of a particular internal pooled fund listed in Appendix A, it will disclose the change to the Board and, subject to the pooled portfolio rules, the Board will decide whether it wishes to remain invested in that pooled fund.

APPENDIX A
Participating Pooled Funds

Current BCI Pooled Fund Benchmarks are found in the Consolidated Product Descriptions (CPD) on The Exchange, or the Detailed Performance Appendix of the Plan's Investment Report

Asset Class Categories Under Section 4.2	*Eligible Pooled Funds*
Short Term	*Canadian Money Market Fund (ST1)*
	Canadian Money Market Fund (ST2)
	US Dollar Money Market Fund (ST3)
	US Dollar Money Market Fund (ST4)
Government Bonds	*Government Bond Fund*
	Short Term Bond Fund
	The Funding Program
Credit	*Corporate Bond Fund*
	Principal Credit Fund
	Investment Grade Private Credit Fund
Developed Markets Equities	*Indexed Canadian Equity Fund*
	Active Canadian Equity Fund
	Active U.S. Small Cap Equity Fund
	Active European Equity Fund
	Indexed Global Equity Fund
	Indexed EAFE[16] Equity Fund
	Global Quantitative Active Equity Fund
	Active Global Equity Fund
	Global Partnership Fund
	Thematic Public Equity Fund
Emerging Markets Equities	*Indexed Emerging Markets Equity Fund*
	Active Emerging Markets Equity Fund
Private Equity	*Private Equity Program*
Real Estate	*Realpool Program*
	BCI QuadReal Real Estate Debt Program
Infrastructure and Renewable Resources	*Infrastructure & Renewable Resources Program*
Other	

[16] Europe, Australasia, and the Far East.

APPENDIX B

Asset Class Policies – Legislative Constraints

Federal *Pension Benefits Standards Act, 1985* Constraints

The PBSR requires investments to be made in accordance with the federal *Pension Benefits Standards Regulations, 1985*, which include the following quantitative rules:

1.	Maximum investment in one company's securities	10% of the market value of the Fund[17]
2.	Maximum proportion of the voting shares of any company	30%

[17] The 10% rule need only be considered at the time an investment is made.

Income Tax Act **and Canada Revenue Agency Constraints**

1. No money is to be borrowed by the Fund, except for the purpose of acquiring real property or occasionally for 90 days or less as provided in *Income Tax Regulation* 8502(i).

2. No prohibited investment (see *Income Tax Regulation* 8514) may be purchased, such as the securities of a participating employer, if the shares of that employer are not listed on one of the stock exchanges prescribed in *Income Tax Regulations* 3200 or 3201.

APPENDIX C

Investment Premises

1. The purpose of investing the Fund is to grow the asset base and to generate cash flow to help secure the Plan's current and future payment obligations. As such, understanding the nature and variability of the Plan's liabilities is critical to devising an appropriate investment strategy. Pension liabilities have an inverse relationship with the valuation discount rate and will decrease if the discount rate rises, and vice versa.

2. The Plan has a long-term investment time horizon and the Fund is managed accordingly. It is extremely difficult to forecast short-term investment returns. However, over the long term, capital markets are more predictable and investors should receive additional compensation for taking investment risks. Therefore, it is expected that over the long term, equities will outperform debt instruments. This proposition is supported by historical evidence.

3. Managing investment risk is just as important as generating returns. Maintaining a well-diversified portfolio is the cornerstone of the Fund's risk management program. The Board recognizes that the conventional view of risk (i.e., volatility of return) is a narrow view of risk that is not comparable across all markets and not fully representative of potential investment outcomes. Therefore, in addition to considering quantitative measures of risk, the Board may factor in qualitative assessments of risk when developing investment policy and monitoring ongoing performance of the Fund. For example, the Board may consider a variety of factors, including, but not limited to:

   - general economic and market conditions;
   - the possible effect of inflation or deflation;
   - the expected risk and return of the portfolio;
   - liquidity, cash flow, capital preservation and appreciation requirements;
   - the nature of the Plan's liabilities;
   - the unique characteristics of various asset classes, including their expected risk and return characteristics, and relationships to each other; and
   - the risk and return characteristics of potential asset mixes within an asset liability framework.

4. The Board recognizes the Fund's asset mix as the primary determinant of the risk and return of its investments, and this also has an impact on the costs of its investments. The Board has identified two types of asset allocation: policy and tactical.

   4.1 Policy asset allocation is set by the Board and establishes the general framework for managing the Fund. This includes

determining ranges for the debt and equity portions of the portfolio, as well as general ranges for individual asset classes (e.g., bonds). Policy asset allocation also establishes the amount of discretion provided to BCI and establishes the total Fund market benchmark.

4.2 Tactical asset allocation focuses on short-term conditions and attempts to increase investment return through opportunistic shifts in the portfolio's asset class weighting. The Board believes that exploiting short term opportunities through tactical asset allocation may not significantly improve the Fund's return, but that it can be undertaken by BCI if BCI expects to improve the Fund's risk-adjusted returns with minimal costs. However, these asset allocation shifts must be within the policy ranges specified by the Board in this Statement. Asset mix rebalancing is useful to ensure that the Fund's desired risk exposure is maintained over the long term.

5. Active management generally entails higher costs than passive investing so active management should only be undertaken when there is a reasonable expectation of generating higher returns than a passive investment alternative for that asset class. The more efficient a market is, the more difficult it is for active managers to add value. Historical evidence supports the following:

   - the value added by active bond managers is low;
   - active managers have had limited success in U.S. equities;
   - active management generally adds value in Canadian equities, international equities, global equities, and emerging market equities; and
   - active management is preferred over passive management for the real estate, infrastructure and renewable resources, private debt, and private equity asset classes.

   Notwithstanding the above, the Board has delegated the decision on the weightings between active and passive strategies to BCI.

6. No one investment style will consistently produce higher returns, and it is not possible to predict which style will outperform over a given period. Employing fund managers within an asset class that use different styles will reduce the Fund's risk, but should be weighed against the potential for generating index-like risk and returns. Value and low volatility funds are expected to result in lower volatility than other styles of investment management.

7. Adding a small allocation of small cap equities to a large cap portfolio can improve returns without significantly increasing risk.

8. Global equity funds are preferable to separate U.S. and international equity funds. Global equity managers can add value by making tactical country and currency allocation decisions. They are also able to choose the best stocks from both regions (U.S. and international) for their portfolio. Notwithstanding the above, the Board has delegated the decision on the weightings between global equity funds and regional funds to BCI.

9. Emerging markets should be treated as a distinct and separate asset class from global equities due to the unique nature of emerging markets.

10. Costs matter and need to be effectively managed so that a greater proportion of investment return passes on to the Plan. In addition, there is a reputation risk management aspect to cost control.

11. The benefits of adding additional fund managers or using external fund managers within any particular asset class should be weighed against the cost of potentially higher management fees, as well as the monitoring and oversight costs for BCI.

12. When the Plan invests outside of Canada, it is subject to the risk of currency fluctuations which impact the value of any gains or losses for foreign investments. Historical analysis indicates that there is little benefit to hedging non-Canadian exposure. Leaving some foreign exposure unhedged moderates both gains and losses, resulting in a less volatile portfolio. However, given the material impact that unhedged currency exposures can have on the Plan's return and volatility of return, the Board authorizes BCI, under Section 6.1, to engage in currency hedging for defensive purposes, when it is concerned about the risks associated with a specific currency.

13. Managing ESG issues can reduce financial risk and can increase the likelihood of better investment outcomes.

14. ESG and Climate Change are long-term material systemic risks to the Plan. Actions to reduce greenhouse gas emissions to combat climate change, improve ESG practices through investor stewardship, select assets, and advocate for appropriate public policies have a direct and indirect positive impact on the plan. Climate change responses create investment opportunities which the Board and BCI have a responsibility to consider.

15. It is consistent with the Board's fiduciary duty to act in the best financial interest of members and beneficiaries, and consider wider stakeholder views and good corporate citizenship in its investment decision making.