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# OMERS' Modern Slavery statement for the financial year ending 31 December 2024

## **Our Business**

The OMERS Primary Pension Plan is one of Canada's largest jointly-sponsored, multi-employer defined benefit pension plans with over 1,000 participating employers ranging from large cities to local agencies and over half a million active, deferred and retired members including union and non-union employees of municipalities, school boards, local boards, transit systems, electrical utilities, emergency services and children's aid societies across Ontario.

OMERS Administration Corporation ("AC") is a statutory corporation without share capital continued pursuant to the *Ontario Municipal Employees Retirement System Act, 2006*. AC is the administrator of the OMERS Primary Pension Plan and trustee of the pension funds.

Certain AC subsidiaries, affiliates or investment entities, including OMERS Private Equity Europe Limited ("OPEE"), OMERS Infrastructure Europe Limited ("OIE"), OMERS Europe Limited and Oxford Properties Management (UK) Limited ("OPM") (collectively the "OMERS UK Affiliates"), carry on business in the United Kingdom ("UK").

The OMERS UK Affiliates provide advice and investing services in relation to OMERS public and private investments in UK and European public investments, private equity, infrastructure, and real estate assets. These investment services are carried out year round, rather than on a seasonal or irregular basis. OPEE, OIE and OPM are authorised and regulated by the Financial Conduct Authority in the UK.

## **UK Modern Slavery Act**

The UK Modern Slavery Act 2015 ("MSA") came into force in October 2015. The MSA introduced a requirement for certain commercial organisations operating in the UK to publish a statement setting out the steps they have taken during the preceding financial year to ensure that slavery and human trafficking are not taking place in any part of their own business, or in any of their supply chains.

This statement is the MSA statement for the OMERS UK Affiliates in respect of their financial year ending on 31 December 2024.

References in this statement to *forced labour* shall mean slavery and human trafficking within the meaning of the MSA.

## **Policies**

The OMERS UK Affiliates oppose the use and exploitation of forced labour. Eradicating forced labour is consistent with the OMERS UK Affiliates' ethical principles and is important to protect their reputation, sustain investor and consumer confidence, and secure their commercial position.

The OMERS UK Affiliates' employees are subject to the OMERS Code of Conduct and Ethics, which emphasises the need for all employees to act ethically, with integrity and to the highest standards and to conduct all OMERS UK Affiliate business in this manner at all times. Employees are also expected to obey the law wherever they do business and are expected to act respectfully and ethically with regard to anyone inside and outside of the organisation. Employees have a responsibility to report any instances of inappropriate or unethical behaviour by others that violates or appears to violate the Code of Conduct and Ethics.

The OMERS UK Affiliates' employees are also covered by the OMERS Workplace Investigations Policy and Whistleblower Guidelines, which encourages the reporting of any and all wrongdoing, and have access to an Ethics Hot Line operated by an independent third-party, which provides employees of the

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OMERS UK Affiliates with a confidential communication channel for reporting concerns about any wrongdoing in confidence and without fear of reprisals or retaliation.

In addition, consistent with the OMERS Statement of Investment Policies & Procedures and Sustainable Investing Policy, the OMERS UK Affiliates integrate environmental, social and governance ("ESG") factors (including human rights and forced labour) into their asset management approaches. They also encourage, where able and appropriate, the adoption of similar ESG practices at the level of OMERS portfolio companies.

Before advising on any investments, the OMERS UK Affiliates carry out due diligence into relevant aspects of the target business, which includes an ESG assessment. Where appropriate, ESG assessments address operational risks such as those which could arise through its supply chain with respect to human rights and labour practices.

As a whole, the risk of forced labour occurring in the businesses or supply chains of the OMERS UK Affiliates is considered to be low.

### **Supply Chain**

The OMERS UK Affiliates' suppliers can be broadly categorised as follows: (i) real estate (e.g., leases); (ii) professional services; (iii) travel; and (iv) technology (including software). Applying a risk-based approach and in line with their own principles, the OMERS UK Affiliates communicate to certain suppliers their expectations regarding adherence to responsible human rights practices. The OMERS UK Affiliates are committed to periodically reviewing and assessing their supplier due diligence processes.

This statement has been prepared for the purposes of the MSA. It will be reviewed annually.



**OMERS Private Equity Europe Limited** 

Name: Matt Baird Position: MD

Date:

2025/10/08 | 2:07 PM EDT

Approved by the board of OMERS Private Equity Europe Limited on: 4 September 2025

Abijail Farrelly

**OMERS Infrastructure Europe Limited** 

Name: Abigail Farrelly Position:

Date:

Oii. Director 2025/10/08 | 12:12 PM EDT

Approved by the board of OMERS Infrastructure Europe Limited on: 8 October 2025

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**OMERS Europe Limited** 

Name: Josh Bezonsky

Position: Director
Date: 27-08-2025 | 01:26 EDT

Approved by the board of OMERS Europe Limited on: August 27, 2025

James Boadle

Oxford Properties Management (UK) Limited

Name: James Boadle

Position: Director

Date:

2025/10/08 | 12:13 PM EDT

Approved by the board of Oxford Properties Management (UK) Limited on: 30 September 2025