
Statement of Investment Policies & Procedures
for the
ELCIC Group Investment Accounts
of current and former members and spouses of the
ELCIC Pension Plan

This Statement is intended to describe the current operating procedures, objectives and policies for the investment and management of the assets of the group accounts sponsored by ELCIC Group Services Inc. (Plan Sponsor). This Statement will be periodically updated as policies are reviewed and revised, and as necessitated by changes in regulations and practice.

This Statement is revised and effective March 11, 2019

Certified to be a true and complete copy of the
Statement of Investment Policies & Procedures

A handwritten signature in black ink, appearing to read "S. Swift", is positioned below the certification text.

1. Overview and Purpose

The primary goal of the group investment accounts is to provide members and spouses of the ELCIC Pension Plan with a means to manage and invest their additional savings and use those savings to fund major purchases, manage significant life events or create an income stream in their retirement.

The Plan Sponsor is responsible for establishing the group investment accounts which may include:

- tax-free savings account (TFSA),
- registered retirement savings plan (RRSP),
- registered retirement income fund (RRIF),
- life income fund (LIF).

This statement outlines the principles by which the group investment accounts are managed.

2. Roles and Responsibilities

Responsibilities of the Plan Sponsor

The Plan Sponsor ensures that the plan funds are managed in accordance with the applicable pension legislation, CAPSA guidelines and this document.

The Plan Sponsor will review this document and the investment options at least once every two years and will amend this document and/or investment options as required to reflect significant changes to the management investment principles.

The Plan Sponsor will employ the services of an authorized life company or financial institution (Fund Holder) to invest all of the assets of the group investment accounts, provided the appointed Fund Holder agrees to abide by the guidelines given in this statement. The Plan Sponsor may also employ the services of legal counsel, actuaries, a performance measurement firm, and other agents and consultants as necessary.

Responsibilities of the Fund Holder

The Fund Holder will provide the Plan Sponsor with reports on the gross rates of return for each investment option periodically. The Fund Holder will maintain an account for each plan member, receive transfer of funds and issue a certificate. The Fund Holder will issue personal statement semi-annually to each plan member and a consolidated statement to the Plan Sponsor.

Responsibilities of the Consultant

The Consultant will provide information on the various options available to the plan member based on their jurisdiction. The Consultant will also assist with the application process and initial set up of the member account, as well as, respond to any ongoing enquiries from the members with an account.

3. Investment

Investment Purpose

The overall purpose is to provide the plan member with an appropriate assortment of investment options for the member to develop their personal portfolio within their risk tolerance, to meet their financial objectives.

Investment Beliefs

The Plan Sponsor has provided investment options based on the following investment beliefs and principles:

- diversification provides an opportunity to reduce risk and potentially increase returns;
- investment managers selected based on demonstrated strengths, can potentially add value;
- a reasonable number of available funds for selection assists the plan member in decision making;
- it is desirable to invest in corporations that demonstrate environmental responsibility, social justice and strong governance practices.

Permissible categories of investments

The group investment accounts will offer a selection of funds that are specifically provided by the Fund Holder as selected by the Plan Sponsor, in accordance with the criteria set out under applicable federal or provincial legislation and regulations.

Each investment manager included in the available options must be a signatory of the UN Principles for Responsible Investing or have internal policies and procedures whereby the ESG criteria form part of their investment making decisions.

4. Member Accounts and Investment Selection

Each member will determine the investment allocation for their account. Each of the selected investment funds is described in detail, including return objectives, in the Investment Policy Statements of the Fund Holder.

The rate of return and degree of risk for each plan member's investments will vary based on the investment allocation made with respect to that member. Plan members are advised to get professional advice and/or use decision making tools provided by the Fund Holder or Consultant. Members may make changes to their investments from time to time if their risk changes, however if the Fund Holder deems that a member is trading excessively, a frequent trading fee may be assessed or the trade disallowed, as per the terms of the contract, as this activity may be detrimental to other investors.

The Plan Sponsor imposes no restrictions on the asset mix of any member's account. An application must be completed, including the member's initial investment choices, in order to set up an account. Therefore the default investment option chosen by the Plan Sponsor, would only be used on a temporary basis while an account is being set up.

Members will receive semi-annual print statements from the Fund Holder. Members also have secured internet access to their account to review their balances and make changes to their investment selections.

Factors that may affect Value of an Account

Due to the nature and objectives of the investment options, each member's account may be exposed to varying degrees to the following financial risks: credit risk, liquidity risk and market risk, including currency risk, interest rate risk and other price risk. Plan members receive semi-annual statements with their account details, giving them opportunity to review their options and contact their financial planner to discuss any concerns or modifications that may be required.

All investment options are subject to fees (except Guaranteed Accounts) which are posted and are disclosed prior to making an election within the post-retirement account. These fees will impact the annual rate of return and value of the investment account.