

RESPONSIBLE INVESTING INQUIRY REQUESTS PROTOCOL

As set out in Ontario Tech University's Statement of Investment Policies, the University recognizes that incorporating environmental, social, and governance ("ESG") factors into its investment process is both prudent and consistent with its social commitment. Additionally, in furtherance of collegial governance principles, it is valuable to provide University community members with the opportunity to raise any significant ESG concerns that affect the University's investment practices.

This protocol defines the process by which members of the University community can present concerns regarding the University's investing practices with respect to the University's restricted and unrestricted endowment funds, specifically in relation to significant adverse ESG impacts associated with the University's investment holdings

1. SUBMISSION PROCESS

- a) The University will consider requests from faculty, staff, students, alumni, or a recognized bargaining unit or student union of Ontario Tech University advocating for a specific investment approach that addresses a particular ESG issue (a "Request") through the submission of a Responsible Investing Inquiry Request form (the "Form"), available on the Finance Department webpage.
- b) All Forms must be submitted to the Vice-President, Administration and must include the following information:
 - i. Name(s) and contact details of the individual(s) submitting the Form, and their relationship to the University.
 - ii. Identification of holding(s) linked to the request, based on the most recent investment annual holdings disclosures, including the materiality of the holding(s) in relation to the overall portfolio.
 - iii. Background on the issue, identifying any alleged significant adverse impacts (potential or actual) in the areas of human rights, labour rights, anti-corruption, or the environment, which holdings in an investment portfolio may cause, contribute to, or be directly linked to, as discussed in the [OECD Guidance on Responsible Business Conduct for Institutional Investors](#) (a "Significant Adverse Impact").
 - iv. The rationale for addressing the issue through a change in the University's investment approach.
 - v. Summary of any action that may have been taken by the relevant holding(s) (i.e., investee companies, bond issuers, etc.) to address the Significant Adverse Impacts, based on publicly available information (e.g., sustainability reporting, media releases, etc.).
 - vi. An explanation as to how the request aligns with the University's fiduciary obligation and investment objectives, as set out in the [Statement of Investment Policies](#).
 - vii. If the request has been made before and, if so, why the previous decision made in respect of that request should be reconsidered.
 - viii. Detailed sourcing for references used in the preparation of the request.

Sections (iii)(iv)(v) and (vi) of the Form should not exceed 2,000 words in length.

2. INITIAL REVIEW

- a) The Vice-President, Administration will undertake the initial review of each Form submitted. As part of the review the Vice-President, Administration may share a Form with and consult with the University's external investment managers.
- b) The Vice-President, Administration may refuse a Form that does not meet the content requirements set out above, is vexatious or frivolous, is not submitted by a member of the University community, or is duplicative of a request made in the past three years (unless significant new information has emerged since the previous request was submitted).
- c) The Vice-President, Administration may conclude a request at the initial review stage if it is determined that the issue raised in the Form can be resolved through routine portfolio monitoring.
- d) The Vice-President Administration will submit to the President any Forms that pass the initial review along with any initial response to the request received from the University's external investment managers as part of the initial review.

3. ASSESSMENT

- a) The President will convene an ad hoc committee to assess requests that pass the initial review. In the event multiple Forms are received during a single year, the President may prioritize referral of the requests to a committee based on the following considerations:
 - i. The impact of the alleged Significant Adverse Impacts.
 - ii. The financial materiality of identified holding(s) for the University's Investment portfolio.
 - iii. Action that is already being taken by external managers or holdings to address the issue.
- b) The ad hoc committee will be comprised of: (i) the Vice-President, Administration; (ii) at least two external experts; and (iii) other members of the University community with relevant expertise. In the appointment of committee members, the President will consider expertise relating to the issue(s) that form the subject of the request and responsible investing practices generally, diversity, perspectives from all sides of the issue, and the avoidance of conflicts of interest.
- c) Once appointed, the committee will assess the request. The factors that the committee will consider in their assessment include, but are not restricted to:
 - i. Consistency with current University policies.
 - ii. How the request aligns with the University's fiduciary obligation and investment objectives, as set out in the Statement of Investment Policies.
 - iii. The materiality and significance of alleged adverse impacts, the extent to which the relevant holding(s) caused, contributed to, or are directly linked to significant adverse impacts, perspective of impacted people and the nature of any action taken by the holding(s) to address the impacts.

- iv. The materiality of relevant holdings for the Investment portfolio.
 - v. Whether the external Investment managers are already responding to the issue, and the nature of that response.
 - vi. The feasibility of meeting the request, including cost or resource implications, practical considerations such as the presence of holdings in pooled funds, and consistency with expectations for external Investment managers, including contractual agreements and requirements set out in the Statement of Investment Policies.
- d) Whether the proposed Responsible Investing action is the most appropriate way to address the issue, or if it could better be addressed by other actions by the University.
 - e) To facilitate its assessment the committee may ask the individual(s) who made the request to present or provide additional information, or may seek external expert advice as required.
 - f) The committee will provide written findings of the assessment to the President, normally within three months of consideration of the request.

4. DECISIONS

- a) Upon receipt of the written findings, the President will either make a final decision with respect to the actions to be taken by the University in response to the request, or will make a recommendation to the Board of Governors through the appropriate governance framework of the University.
- b) The Vice-President, Administration will be responsible for ensuring that the decision in respect of a request is implemented and will provide a summary of the resolution of the request, with the rationale for the decision and any implementation actions, to the individual(s) who made the request.

Responsible Investing Inquiry Request Form

This form is to be used by members of the Ontario Tech University community to present concerns regarding significant adverse ESG impacts associated with the University's investing practices with respect to the University's restricted and unrestricted endowment funds investment holdings. All Forms must be submitted to the Vice-President, Administration at <email address>.

Personal information on this form is collected under the authority of the University of Ontario Institute of Technology Act, SO 2002, c. 8, Sch. O. and will be collected, protected, used, disclosed and retained in compliance with Ontario's Freedom of Information and Protection of Privacy Act R.S.O. 1990, c. F.31. This information will be used to administer the responsible investing request as set out in the university's responsible investing requests protocol. Questions regarding the collection of your personal information may be directed to: Office of the Vice-President Administration, 2000 Simcoe Street North, Oshawa, ON L1H 7K4, VPAdmin@ontariotechu.ca

Name of Submitter(s):		Relationship to University	<input type="radio"/> Faculty <input type="radio"/> Staff <input type="radio"/> Student <input type="radio"/> Alumni <input type="radio"/> Union
Email:			

University Holding(s) related to the request as per the most recent investment annual holdings disclosures (add lines as needed)	Materiality of the holding(s) (expressed as a percentage of the overall portfolio)
1.	

Sections A to D collectively cannot exceed 2000 words.

A. Background on the Issue. Identify any alleged significant adverse impacts (potential or actual) in the areas of human rights, labour rights, anti-corruption, or the environment, which holdings in the University's investment portfolio may cause, contribute to, or be directly linked to.

B. Actions Taken. Provide a summary of any action that may have been taken by the relevant holding(s) (i.e., investee companies, bond issuers, etc.) to address the identified issue based on publicly available information (e.g., sustainability reporting, media releases, etc.).

C. Rationale. Provide an explanation for why the identified issue should be addressed through a change in the University's investment approach.

D. Alignment with University's Obligations. Provide an explanation as to how the request aligns with the University's fiduciary obligation and investment objectives, as set out in the Statement of Investment Policies.

References. Detailed sourcing for references used in the preparation of the request

Has this request been submitted in the previous 3 years? Yes: _____ No: _____

- c) If yes, please explain what significant new information has emerged since the previous request was submitted (250 words max). *The Vice-President, Administration may refuse a Form that does not meet the content requirements set out above, is vexatious or frivolous, is not submitted by a member of the University community or is duplicative of a request made in the past three years (unless significant new information has emerged since the previous request was submitted).*