

Statement of Investment Policies and Goals

1. Introduction

The Statement of Investment Policies and Goals (the "Policy") provides the framework for the management of the investments of the Nova Scotia Teachers' Pension Fund (the "Fund"). The Fund was established by an act of the Legislative Assembly in 1949 and has continued under successor acts.

The trustee for the Fund as defined in the 2005 Agreement between the Province of Nova Scotia and the Nova Scotia Teachers' Union is the Teachers' Pension Plan Trustee Inc. (the "TPPTI"). In accordance with the terms of the Joint Trust Agreement the TPPTI is responsible for the investment of the Fund.

2. Rationale

The purpose of the Policy is to serve as a guide to those given responsibilities for Fund management including Nova Scotia Pension Services Corporation ("NS Pension"), external investment managers and others who may be retained to provide supplemental service. This document will commit to writing the objectives and policies established by the TPPTI, to ensure all parties in the management of the Fund clearly understand the policies, goals and direction of the Fund and to facilitate the delegation of investment management responsibilities.

3. Policy Statement

The primary goal of the Fund is to satisfy pension obligations.

4. Policy Objectives

The Fund must operate in the long-term interest of the beneficiaries to ensure that the assets, together with the expected contributions, are invested in a prudent manner so as to meet the liabilities of the Plan and reduce surplus risk.

The Fund must also maximize returns on both an absolute and relative basis within acceptable levels of volatility and risk. The absolute return is measured with respect to the actuarial assumed rate of return. The two elements of the actuarial rate of return are the inflation assumption and the actuarial assumed real rate of return. The relative return of the portfolio is measured against an appropriate market benchmark.

5. Investment Beliefs

It is recognized by the TPPTI that there is value in committing to writing a set of investment

beliefs which allows the TPPTI to present these beliefs clearly and for all those with a vested interest in the Teachers' Pension Plan (the "Plan") to gain a better understanding of the Fund investments and how they are shaped. The investment beliefs will form the basis for investment policies, help guide the management and administration of pension assets and allow the beliefs of the TPPTI to be implemented in a consistent manner throughout the Fund. The core investment beliefs, in bold, do not change over time while the beliefs that follow each core belief, the working beliefs, may change.

- a) An effective governance structure is necessary for achieving the objectives of the Fund.
 - Strong plan governance, including the management of ESG (environmental, social and governance) factors and unconstrained investing, increases the likelihood that the Fund performs well from a risk and return perspective over the long term.
 - Consistently applying investment beliefs across the Fund enhances alignment of perspectives between the TPPTI and NS Pension and assists in providing efficient management of the Fund.
- b) The funded status of the Plan and the long-term nature of its liabilities heavily influence the Fund's policy asset mix.
 - Given the long-term nature of Plan liabilities, the Fund has a long-term investment horizon and exploits assets that offer liquidity premiums.
 - Given that the Plan has negative net cash flows resulting from pension obligations, assets that generate cash are a benefit when included in the policy asset mix.
- c) The management and investment of the Fund are consistent with its long-term investment horizon and the Fund's sustainable investment philosophy.
 - Benchmarks and reporting are aligned with the Fund's long-term investment horizon. However, it is recognized that monitoring short-term performance is important to achieve long-term performance goals.
 - Consistent with its sustainable investment philosophy, the impact of actions on future members and the importance of adapting the Fund to changing risks such as climate change are considered.
 - Implementation of investment strategies that create long-term sustainable value as well as the hiring of external service providers that consider the long-term impact of their actions are a key part of the Fund's sustainable investment policy.
- d) The most significant influence on the long-term investment performance of the Fund is the policy asset mix.
 - The policy asset mix reflects the Trustee's current risk and return appetite for the Fund.

- The policy asset mix provides a well-diversified and balanced portfolio of betas to assist in both managing Fund volatility and meeting return requirements.
- e) Implementation of the policy asset mix targets reducing volatility and adding value to the benchmark.
 - Investment strategies and asset classes that provide downside protection reduce funded ratio volatility and benefit the Fund's long-term performance.
 - Dynamic asset allocation within the Fund adds value versus the benchmark.
 - Generally, active management in public markets adds value to the benchmark in markets where conviction is high.
 - Permitting opportunistic investments adds value relative to the Fund's benchmark.
- f) Risk is required to generate the returns needed to meet long-term pension obligations but is only taken when rewarded. Unrewarded risks are eliminated or sufficiently mitigated.
 - Exposure to foreign currencies is a product of holding non-Canadian investments and exposes the Fund to currency risk. To benefit from the diversification properties of certain currencies, a currency overlay program is maintained within the Fund.
 - Management of qualitative risk, such as operational risk, is as important as managing quantitative risks such as investment return volatility.
- g) Costs matter to the performance of the Fund and are effectively managed.
 - Given the impact on net returns, managing costs is an important part of the implementation of the policy asset mix and underlying investment strategies.
 - When choosing and evaluating investment managers and investment strategies, striking a balance between cost, the ability to generate consistent and strong returns and reduced volatility is important.

6. Roles and Responsibilities

The roles and responsibilities of the various groups involved in the investment and administering of the Fund has been established to ensure effective and efficient management of the Fund with appropriate oversight and controls in place.

6.1 TPPTI

The trustee for the Fund is the TPPTI. The TPPTI is responsible for the Fund and its management and as such approves policies associated with the Fund. The TPPTI may TPP Statement of Investment Policies and Goals

delegate certain functions and receive recommendations from other entities.

6.2 Investment Committee

The TPPTI has created an Investment Committee to perform the following functions: monitor the investments of the Fund and make recommendations as required; review Fund and investment manager performance; make recommendations on the hiring and termination of investment managers; and review investment policies and recommend changes as necessary. The Investment Committee shall make recommendations to the TPPTI.

6.3 Nova Scotia Pension Services Corporation

As directed by the TPPTI, NS Pension is responsible for the management, day-to-day operations and liquidity of the Fund including adherence to policies and guidelines as approved by the TPPTI. The terms upon which the TPPTI has delegated authority to NS Pension will be contained in the Administrative Services and Investment Management Agreement.

6.4 Investment Managers, Fund Managers and Advisors

The Fund uses a multi-strategy platform to invest the assets of the Fund, executed through both NS Pension as well as a structure of external investment managers, fund managers and advisors. The responsibilities of all are delegated by the TPPTI through the approval of investment policies and mandates.

6.5 Fund Custodian

The Fund's custodian will fulfill the regular duties required by law of a custodian and their duties as outlined in the custodial agreement.

7. Risk Management

The primary risk to the Plan is surplus or funding risk. This is the long-term risk that the Fund does not have sufficient assets to meet the Plan's future pension obligations. Secondary risks associated with the investment and management of the Fund include, but are not limited to, market, credit, counter party, liquidity and operational risk. The following risk management tools are employed by the Trustee to mitigate risk.

Asset Liability and Asset Allocation Studies

On an annual basis, NS Pension shall undertake a review of the policy asset mix. Every five years, or as conditions or circumstances warrant, an asset liability or asset allocation study shall be conducted by an external consultant.

Such studies will assist the TPPTI in determining the appropriate long-term asset mix in light of the Fund's future pension obligations and will minimize the funding risk to an acceptable level.

Long-Term Asset Mix

The long-term asset mix will determine the long-term performance and risk profile of the Fund.

A well-diversified portfolio by asset class, geography, industry and investment style will greatly reduce the risk of the Fund and as such is the best tool that the Fund has to control risk. The asset mix is determined by a number of factors, one of which is the goal of a well-diversified portfolio.

Policies

To manage secondary risks such as market, credit, counterparty and liquidity risks, specific policies shall be developed and maintained to address these issues. The respective policies are listed in Appendix 2 and are reviewed on an annual basis.

Internal Controls

To address operational risk, NS Pension shall maintain and annually review a comprehensive set of internal procedures and policies to ensure that internal controls remain at an appropriate standard. The Director, Enterprise Risk & Compliance of NS Pension shall monitor compliance to the Fund's policies and guidelines as well as NS Pension's internal procedures and policies.

Liquidity

NS Pension shall manage the day-to-day liquidity of the Fund to mitigate the risk that the Fund is unable to meet its financial obligations and benefit payments. The liquidity of asset classes and their respective weightings is also an important factor in the determination of the Fund's overall liquidity profile and liquidity risk shall be an important consideration as the strategic policy asset mix is reviewed by the TPPTI.

8. <u>Investment Directives</u>

8.1 Policy Asset Mix

The long-term strategic investment of the Fund is expressed through the following asset classes: equity, fixed income, real assets and absolute return strategies. As determined by the TPPTI, the policy asset mix sets out the target weights for each of the asset classes with consideration given to the health of the Fund, long-term expected risk and return objectives, diversification of assets and the liquidity profile of the Fund.

Short-term tactical asset allocation of the Fund focuses on short-term conditions and opportunistic shifts in asset class weights and is expressed through the policy ranges (maximum and minimum) of the asset class weights. The rebalancing of weights of the asset classes within the policy range shall be the responsibility of NS Pension. NS Pension shall review asset class weights on a regular basis and rebalance the asset mix with consideration to the cost of doing so.

In 2020, through an asset-liability study process, a decision was made by the TPPTI to adopt a new policy asset mix with the objective of diversification of Fund assets and reducing the volatility of valuations. The column "Target Weight", in the table below represents the new asset class benchmark weights inclusive of approved implementation edits since 2020.

Asset Class	Benchmark	Minimum Target Weight	Target Weight	Maximum Target Weight
Equity				
Canadian	S&P/TSX Composite		3%	
US Large Cap	S&P 500		6%	
US SMid Cap	Russell 2500		2%	
International Large	MSCI EAFE		4.5%	
International Small	MSCI EAFE SC		2%	
Global	MSCI ACWI		7% *	
Emerging Markets	MSCI EM		5%	
Private Equity	MSCI ACWI + 2%		3% **	
Total Equity		22.5%	32.5%	42.5%
Fixed Income				
Government Bonds	FTSE TMX All Gov't		7.5%	
Credit	***		15%	
RRB	***		<u>3.0%</u>	
Total Fixed Income		15.5%	25.5%	35.5%
Real Assets				
Real Estate				
Infrastructure				
Agriculture/Timber				
Total Real Assets	CPI + 4.5%	20%	30%	40%
<u>Absolute</u>	****	5%	10%	15%
<u>Return</u>				
Cash	FTSE TMX 30 Day T-Bill	0%	2%	7%
Total			100%	

^{*} To be reduced in conjunction with Private Equity funding

 $[\]ensuremath{^{**}}$ To be increased in line with timing of funding

^{***} Customized benchmarks, refer to applicable Fixed Income Policy for details.

^{****} Customized benchmark, refer to applicable Hedge Fund Policy for details.

8.2 Benchmarks

In order to evaluate the performance of the Fund, the TPPTI shall measure the performance of each asset class relative to the performance of a benchmark. These benchmarks normally represent the return of market indices from each of the asset classes or CPI or SOFR + benchmarks. The Fund benchmark shall be a composite of these indices based on the weights of each asset class.

8.3 Investment Constraints

In addition to the directives provided in the Policy, asset class constraints are also outlined in the investment policies detailed in Appendix 2 and within investment management agreements and mandates of specific investment managers.

Additionally, at the fund level, the Fund shall not:

- Issue debt;
- Apply leverage;
- Invest in one name which exceeds 5% of total Fund assets excluding;
 - Government of Canada and related entities;
 - Government of the United States and related entities will have a maximum of 10%.
 - The Royal Bank of Canada (RBC), Toronto Dominion Bank (TD), Bank of Montreal (BMO), Bank of Nova Scotia (BNS) and Canadian Imperial Bank of Commerce (CIBC) will each have a maximum of 10%.

8.4 Permissible Investments

Permissible investments within the Fund are described within the investment policies listed in Appendix 2 and within investment management agreements and mandates of specific investment managers.

For clarity, certain investment managers and asset classes shall be permitted to:

- Pledge assets as security for a loan or obligation;
- Engage in the act of selling a security that the Fund does not own;
- Use debt to finance an asset purchase (leverage);
- Borrow securities for the completion of a short sale;
- Purchase securities on margin which involves buying a security while paying only a portion of the total value.

8.5 Investment Exceptions

When applying the above directives, it is recognized that there may be occasions during which the policies are breached for valid investment reasons. It is the responsibility of NS Pension to report any violations to the TPPTI and to recommend appropriate action.

9. Securities Lending

The securities of the Fund may be loaned for the purpose of generating revenue for the Fund subject to the Income Tax Act of Canada and its regulations, and to any other applicable laws. Such loans must be secured by cash and/or readily marketable Government bonds, short term debt, corporate debt, common and preferred shares or convertible securities having a market value of at least 105% of the loaned securities or 102% if it reflects best practices in the local market in which the securities are being lent. The terms and conditions of the securities lending program are set out in a contract with the Custodian, including an approved list of those institutions to be utilized.

10. Performance Measurement

10.1 Investment Manager Performance Evaluation

Investment managers shall achieve a time-weighted rate of return, net of fees, which exceeds their benchmark, as defined in their mandate, over the medium to long term period. The adequacy of value added will be judged relative to competitors with the same mandate and by comparing actual volatility to the benchmark's volatility.

Investment manager performance to their benchmark is monitored on a regular basis as is each manager's style, risk and compliance to their mandate. Failure to comply with policies and/or mandates may cause an investment manager to be terminated.

10.2 Real Asset Performance Evaluation

Real asset fund managers aim to achieve a targeted gross internal rate of return as well as, in most instances, a cash yield over the life of their real asset fund. Performance of the real asset fund manager will be judged based on fund performance versus targets and on compliance to the terms and conditions contained in fund agreements.

Real asset fund manager performance compared to their targeted return and, if applicable, cash yield, is monitored on a regular basis as is each manager's compliance to the fund agreements. Failure to comply may result in the sale of Fund ownership or the termination of the manager in accordance with the applicable provisions of the agreements.

10.3 Valuation of Investments

The Fund shall follow the principle of Fair Value when valuing investments. For investments that trade on public equity and fixed income markets the Custodian will provide asset values. For assets that do not trade on public markets such as real estate and infrastructure, a suitable methodology shall be used: discounted cash flows; appraisals or other pricing models as appropriate.

11. Proxy Voting

11.1 Proxy Voting Procedure

Generally, the Fund shall adopt a passive approach to voting proxies by delegating the responsibility to investment managers under contract. To ensure that proxies are voted in accordance with the TPPTI's engagement and sustainable investing strategies, NS Pension will engage, in certain circumstances, with investment managers(s). All managers shall annually be requested to provide NS Pension with a copy of their policy on proxy voting.

11.2 Proxy Voting Reporting

NS Pension shall report to the TPPTI annually on the voting of proxies within the Fund.

12. Standard of Care

12.1 Standard of Care

The TPPTI and NS Pension as well as agents (investment managers, custodians, consultants etc.) employed by the Fund must maintain a standard of prudence and reasonableness in the management of the Fund's assets.

An agent is defined to mean a company, organization, association or individual, retained by the Fund to provide specific services with respect to administration and management of the Fund.

More specifically, NS Pension shall exercise the same degree of care, diligence and skill that a prudent, professional pension administrator and investment manager experienced in the administration and investment of pension plans would exercise in like circumstances.

External service providers under contract to the Fund shall maintain an appropriate standard of care in the management of the Fund's assets. The custodian shall perform its duties with the skill and care that would be expected from a professional custodian and investment managers shall exercise such competence and skill as may be expected of a prudent and professional investment advisor.

12.2 Disclosure

Any person listed above shall disclose any direct or indirect association or material interest or involvement in aspects related to their role with regard to the Fund's investments which may result in any perceived or actual conflict of interest. It is expected that no Director or Chair of the TPPTI, no staff of NS Pension or agent shall make any personal financial gain (direct or indirect) because of their position.

It is incumbent on any party affected by this statement who believes that he/she may

have a conflict of interest, or is aware of any conflict of interest, shall notify the appropriate office according to the policy to which they are subjected. Disclosure should be made promptly after the affected person becomes aware of the conflict. According to the respective policies, the appropriate office shall decide what action is appropriate under the circumstances.

No affected person who has or is required to make a disclosure as contemplated by this statement shall participate in any discussion, decision or vote relating to any proposed investment or transaction in respect of which he/she has made or is required to make disclosure.

The TPPTI shall be subject to its Conflict of Interest Policy and NS Pension and agents shall be subject to their respective conflict of interest policies. Any violation by NS Pension or agent of their conflict of interest policies shall be reported to the TPPTI.

12.3 Related Party Transactions

NS Pension shall not enter into a transaction with a related party, on behalf of the Plan, unless:

- the transaction is required for the operation or administration of the Plan and the terms and conditions are not less favourable to the Plan than market terms and conditions;
- the securities of the related party are acquired at a public exchange; or
- the value of the transaction is not material to the Fund.

A related party is defined as: NS Pension and its officers, directors and employees; those holding or investing on behalf of the Fund such as investment managers and the custodian and their officers, directors and employees; unions representing members of the Plan and their officers, directors and employees; an employer who participates in the Plan and their officers, directors and employees; a member of the Plan; and a corporation controlled or indirectly controlled by any of the above. A related party does not include government or government agency.

Requirements for disclosure of conflicts of interest include related party transactions.

13. Reporting Requirements

NS Pension shall provide an annual report to the TPPTI that shall include the following information: performance of the Fund; asset mix; top 20 holdings; major accomplishments in the past year; and an economic and market outlook.

NS Pension shall provide quarterly reports to the TPPTI on the Fund's performance, investment manager performance, asset mix, inter-manager flows, risk analysis and compliance.

NS Pension shall provide monthly reports to the TPPTI that shall include Fund performance, asset mix and general market information.

Annual financial results and statements shall be provided to the stakeholders and shall be made public. Results and statements shall include any material breaches of policy compliance and actions undertaken to correct the breach.

14. Professional Standards

All investment managers are expected to adhere to the Code of Ethics and Standards of Professional Conduct of the CFA Institute or an acceptable equivalent.

15. Policy Administration and Enquiries

The Policy shall be reviewed annually. Recommendations for policy changes as well as questions and queries on the Policy should be brought to the Chair of the TPPTI.

16. Compliance and Sanctions

Failure to comply with the Policy may result in discipline up to and including termination.

17. References

The Plan is a defined benefit plan established by an act of the Legislative Assembly in 1949 and has continued under successor acts.

18. Appendices

The attached appendices to the Policy are for information purposes and shall be kept up to date by NS Pension.

- 1. Glossary of Terms
- 2. Related Policies
- 3. Policy History
- 4. Transition Benchmark

APPROVED BY MOTION at the Teachers' Pension Plan Trustee Inc. Meeting of November 17, 2015, all subsequent amendments approved by motion on:

- o September 20, 2016
- o May 16, 2017
- o November 14, 2017
- o May 15, 2018
- o December 10, 2020
- o June 8, 2021
- o September 21, 2021
- o June 7, 2022
- o December 7, 2023
- o June 11, 2024

APPENDIX 1

Glossary of Terms

Absolute Return Strategies: an investment strategy which focuses on generating positive returns in

rising and falling capital markets.

Actuarial assumed rate of return: the assumed rate of return as stated in the annual Report on the Actuarial

Valuation for Funding Purposes.

Asset Mix: the proportion of assets invested in cash, equities, fixed-income securities

and real estate.

Asset/liability Studies: an examination of the long-term projections of a pension plan's

investment assets and liabilities to determine whether the plan will be in

a deficit or surplus position.

Benchmark: a standard against which rates of return can be measured. Stock and

bond market indexes are two examples.

CFA: Chartered Financial Analyst.

CPI: Consumer Price Index measures changes in the price level of consumer

goods and services purchased.

Custodian: an independent company entrusted with holding investments on behalf

of the owner. They maintain the financial records for the investments and

settle trades.

Defined Benefit Pension Plan: a pension plan in which retirement benefits, rather than contributions into

the plan, are specified.

Derivatives: financial contracts that derive their value from an underlying asset or

index. Some common derivatives are forwards, futures, swaps and

options.

EAFE: an equity index which covers the regions of Europe, Australasia and Far

East.

Equities: share ownership of a company.

Fair Value: a valuation methodology; the amount which an asset could be exchanged

between knowledgeable and willing parties in an arm's length transaction.

Fixed Income: securities that generate a predictable stream of interest such as bonds

and debentures.

Infrastructure: term used to define a class of physical assets, often for public use, that

typically provide basic services. Such assets include bridges, roads,

pipelines, electricity, ports etc.

SOFR: Secured Overnight Financing Rate, a daily rate representative of

secured lending between two market participants.

Portable Alpha: Investment strategy whereby passive exposure to a market is

achieved with derivatives (beta) and underlying cash and market neutral related strategies (alpha) such that the net result is the total market exposure plus alpha 'ported' from the market neutral strategies with the goal of exceeding the benchmark at very little

incremental risk.

Private Assets: ownership interest in assets that do not trade on public exchanges.

Proxy Voting: written authorization by a shareholder for someone else to represent

them and vote their shares at a shareholders' meeting.

RRB: Real Return Bonds.

Short Selling: the sale of a security the seller does not own.

Swaps: over-the-counter derivatives that obligate the parties to exchange the

financial returns from one asset or index for those of another at a specified rate of exchange over a pre-determined period of time.

Term / Time Periods Short Term

Typically 1-3 years

Mid Term

Typically measured at 4 or 5 years. Often considered a 'market cycle',

ranges from 4-7 years

Long Term

Typically measured around 10 years, anything longer than 7 years and

ranging from 7-12 years

Venture Capital: capital invested in young companies that have the potential to grow and eventually earn profits

APPENDIX 2

Related Policies

Policy	Approved By	Date Approved	
Cash Management Policy	ТРРТІ	2022 March	
Currency Policy	ТРРТІ	2023 September	
Derivatives Policy	ТРРТІ	2022 March	
Fixed Income Policy	ТРРТІ	2023 December	
Hedge Fund Investment Policy	ТРРТІ	2023 June	
Real Asset Investment Policy	ТРРТІ	2023 December	
Investment Manager Selection & Monitoring Policy	ТРРТІ	2022 June	
Sustainable Investment Policy	TPPTI	2022 March	
Portable Alpha Policy	ТРРТІ	2023 September	
Private Equity Policy	ТРРТІ	2024 April	

APPENDIX 3

Policy History

Current Effective Date: 2024 June 11

Past Effective Dates: 2005 December 5

2008 February 5 2009 June 23

2010 September 15 2011 August 30 2013 July 23

2015 November 17 2017 May 16 2017 November 14

2018 May 15

2020 December 10

2021 June 8

2021 September 21

2022 June 7 2023 December 7

Next Scheduled Review Date: 2026