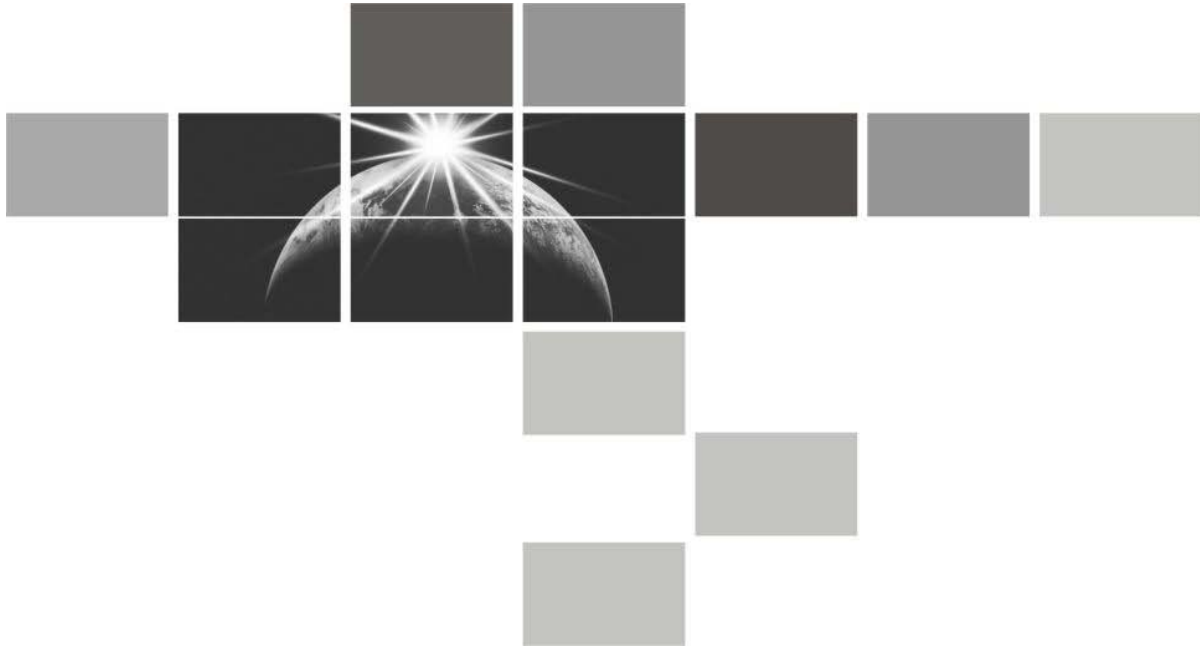


D.A. TOWNLEY
& ASSOCIATES LTD.



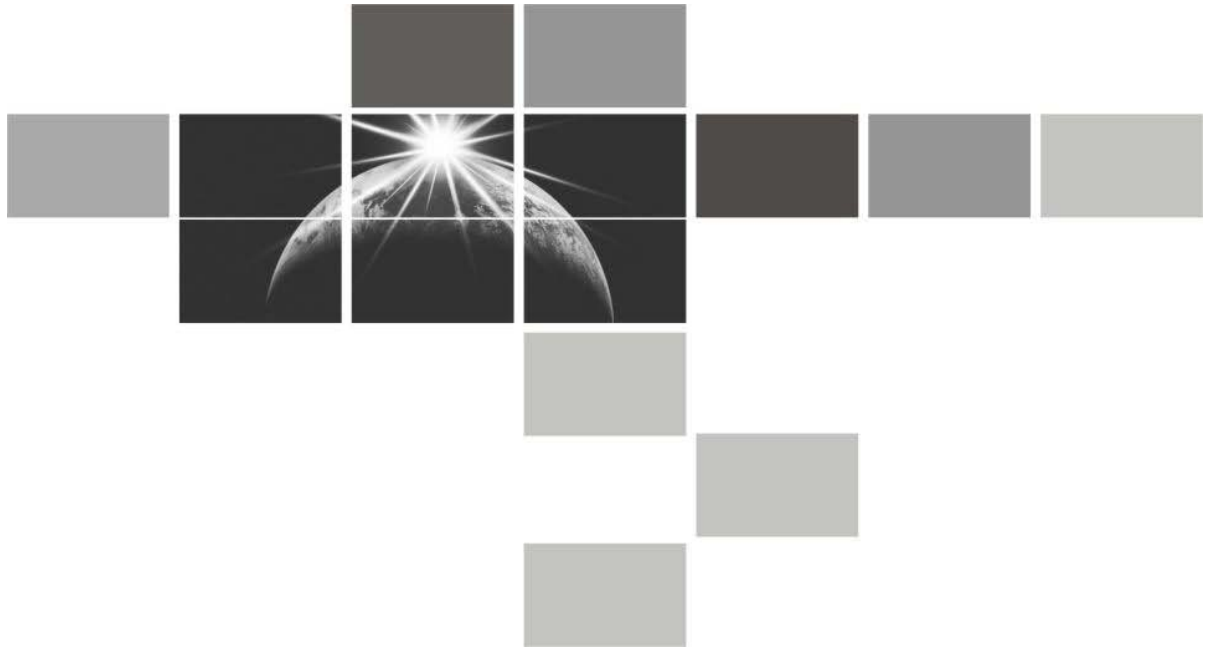
Governance Manual

for

*Victoria Mechanical Industry
Pension Plan*

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Part 1

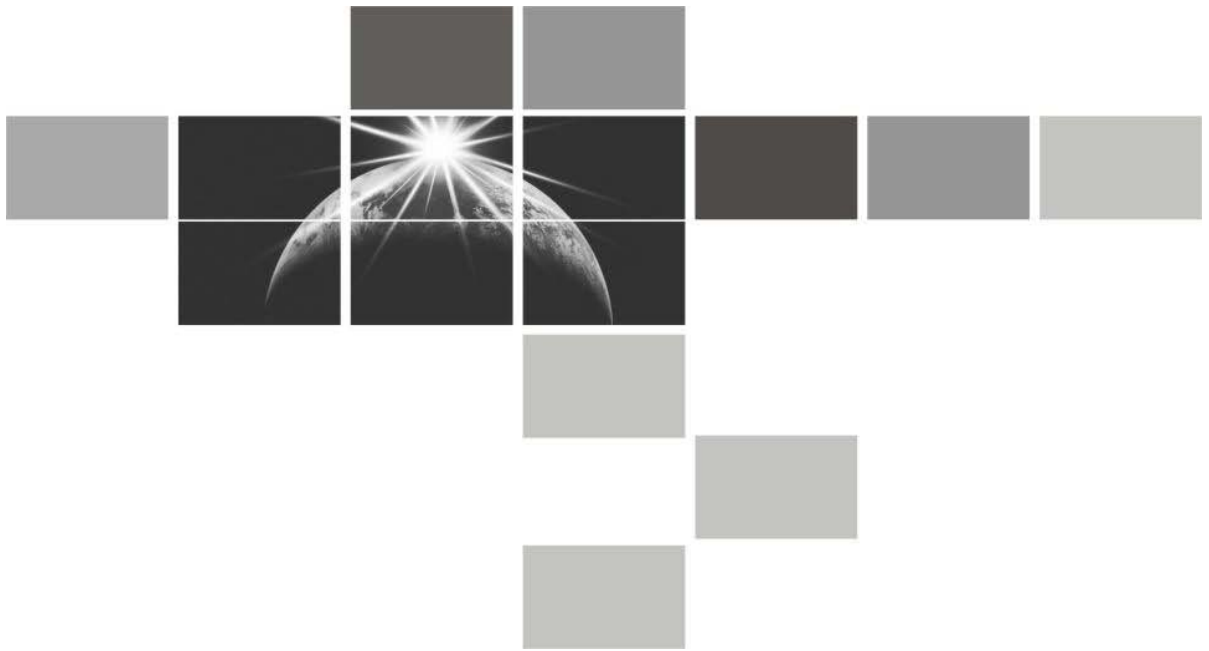
Mission Statement

Part 1: Mission Statement

It is the aim of the Victoria Mechanical Industry Pension Plan:

- to deliver the pension promise to the members in the most cost effective manner possible
- to provide quality management in a cost effective manner
- to communicate and update the plan members at least annually
- to be open and available to the membership for information and assistance, and
- to protect the assets of the Plan.

The Trustees recognize their obligation to make sound, informed decisions which advance and protect the interests of both the current and future beneficiaries of the Plan.



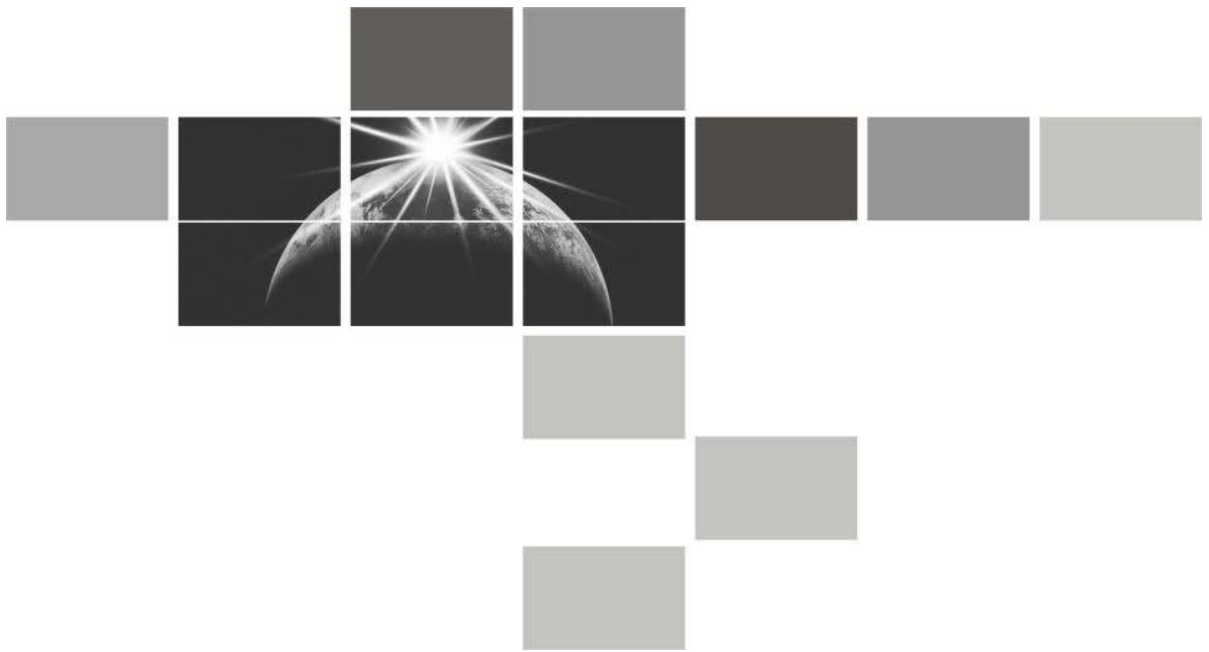
Part 2

Foundation Documents

Part 2: Foundation Documents

Document	Reviewed When?	Where	E-Copy (Y/N)
1. trust document	Every 3 years	UA Hall	
2. <i>Pension Benefits Standards Act</i> and Regulations	As needed	On net	
3. relevant portions of the <i>Income Tax Act</i> and Regulations	As needed	On net	
4. <i>Trustees Act</i>	Every 3 years	On net	
5. mission statement	Annually		
6. name, address, e-mail, fax, phone number of all Trustees and third party suppliers and advisers	As needed	UA Hall	
7. acceptance of Trusteeship	When changed	UA Hall	
8. copies of all contracts with third party suppliers	Annually	UA Hall	
9. SIP&P	Annually	UA Hall	
10. last two years of minutes	Prior ones at each meeting	UA Hall	
11. copies of all policies	Annually	UA Hall	
12. copy of all participation agreements signed by employers	As needed	UA Hall	
13. list of all employers bound by the plan	As needed	UA Hall	
14. all insurance contract protecting the Trustees	Annually	UA Hall & Trustees	
15. actuarial and audited financial results	Annually	UA Hall & Actuary	

16. latest actuarial studies	As needed	UA Hall & Actuary	
17. conflict of interest policy	Annually	UA Hall	
18. correspondence including legal opinions	As needed	UA Hall	
19. governance plan	Annually	UA Hall & Trustees	



Part 3

Policy Handbook

**STATEMENT OF INVESTMENT POLICIES AND GOALS
FOR THE VICTORIA MECHANICAL INDUSTRY PENSION PLAN**

Part 3A: Trustees' Code of Conduct

1. Agreement to act in the best interests of the beneficiaries.
2. Duty to avoid any conflict of interest.
3. Duty of confidentiality.
4. Expend best efforts – advise when you fail.
5. Acknowledge when you need assistance and in what amount.
6. Honesty and integrity are fundamental.
7. Duty to report to the membership on plan operations and actions in a timely manner.
8. Duty to employ most competent staff and third party advisers.
9. Duty to treat all the persons who work for the trust appropriately.
10. Duty to keep abreast of all developments in the industry.
11. Duty to keep advanced technologically to ensure the fund operates effectively.
12. Duty to be in contact with and act appropriately with the regulatory authorities.
13. Duty to have a system for the disclosure of conflict of interest.
14. Duty to report fully and openly on all financial affairs that affect the trust or emanate from the trust.
15. Duty of all Trustees to educate themselves and to keep current on the state of the law and regulations.
16. Duty to abide by the dispute resolution mechanism if there are any disputes between Trustees or any breach of duty.
17. Duty to ensure that the fiduciary interest of the beneficiaries is always in the forefront and never secondary to any other purpose.
18. Duty not to communicate with beneficiaries about their personal benefit levels.

STATEMENT OF INVESTMENT POLICIES AND GOALS
FOR THE VICTORIA MECHANICAL INDUSTRY PENSION PLAN

Part 3B: Governance Policies

A. Investment Policy

STATEMENT OF INVESTMENT POLICIES AND GOALS
FOR THE VICTORIA MECHANICAL INDUSTRY PENSION PLAN

Statement of Investment Policies and Procedures

Victoria Mechanical Industry Pension Plan

Including all amendments approved by the Trustees
up to and including November 8, 2000

Specified Multi-Employer Pension Plan
Revenue Canada Registration Number 0544965
B.C. P.B.S.A. Registration Number P085540

Prepared by:
D.A.TOWNLEY & ASSOCIATES

November 2000

**STATEMENT OF INVESTMENT POLICIES AND GOALS
FOR THE VICTORIA MECHANICAL INDUSTRY PENSION PLAN**

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1. PURPOSE

- (1) This statement of investment policies and goals (the "Policy") applies to the assets held in the Pension Trust Fund (the "Fund") in respect of the liabilities for members of the Victoria Mechanical Industry Pension Plan.
- (2) The purpose of this document is to adopt a clear investment policy, provide a basis from which to monitor the Fund performance, and provide broad investment guidelines for the management of the Fund.
- (3) This Policy may be changed or modified at anytime by action of the Trustees.
- (4) Any investment manager (the "Manager") or other agent or advisor providing services in connection with the investment of the Fund shall accept and adhere to this Policy.

2. TRUSTEE RESPONSIBILITIES

- (1) The Trustees have the responsibility to administer the Plan and have ultimate responsibility for the prudent investment of the Fund. The Trustees are responsible for all aspects of the investment of the Fund, including developing an investment policy, establishing and maintaining an investment manager structure, and monitoring investment results.
- (2) The Trustees may delegate their responsibilities under this Policy as they deem appropriate.
- (3) The Trustees may adopt regulations which establish the delegated responsibilities and powers and the corresponding delegates (e.g., investment manager, custodian). In the case of delegation regarding any aspects of this Policy, the reference to the Trustees herein shall be interpreted as a reference to the appropriate delegate.
- (4) The Trustees may undertake direct investments in real estate and mortgages.

3. PLAN OVERVIEW

- (1) The Plan is a defined benefit plan and provides benefits on retirement, death and termination for Members. Monthly benefits are calculated as a fixed percentage of contributions made to the Plan on the Member's behalf.
- (2) At retirement pensions are paid from the Fund on a monthly basis.
- (3) The investment objectives for the Plan recognize that the benefits are provided from a fixed contribution per hour worked by Plan Members. The contribution rate is detailed in the Collective Agreements.

- (4) A Member can self-pay contributions to enhance his benefits, subject to the contribution limits imposed by the Income Tax Act of Canada and its Regulations.
- (5) Because of the fact that the benefits are derived in direct proportion to the contribution rate set by Collective Agreement, the Plan Members have a direct exposure to risk in the Fund's Investment return and levels of inflation.
- (6) It is the intention of the Trustees to make every effort to provide periodic increases to accrued and pensioner benefits, as may be permitted by available funds.

4. FUND OBJECTIVE

- (1) The long-term financial condition of the Fund is directly related to the return achieved by the Fund and the level of contributions.
- (2) The objective for the Fund is to achieve over four-year moving average periods, the total rate of return including capital gains, dividends, interest and rental income, as follows:
 - (a) a rate of return, net of investment manager expenses which should be at least equal to 7.0% per annum; and
 - (b) a rate of return which exceeds the annual change in the Consumer Price Index for Canada plus 3.0% per annum
 - (c) a rate of return sufficient to provide for the benefits accrued to all members of the Plan, all future benefits and allow for ad hoc benefit increases.

5. INVESTMENT BELIEFS AND INVESTMENT MANAGER STRUCTURE

- (1) The Trustees believe that competent external professional investment managers can add value, relative to the benchmark portfolio, through the opportunistic selection of stocks and bonds and the timely management of the asset mix. Accordingly, the investment manager selected by the Trustees is expected to actively select securities and to actively modify the asset mix over the short term to add value relative to the benchmark portfolio.
- (2) The Trustees believe that risk should be controlled, and that constraints should be established to ensure that excessive risk is not taken by the investment manager, relative to the benchmark portfolio.

- (3) Given the Trustees' investment beliefs, the Trustees have decided to retain one external pooled fund manager, with a balanced fund, and the discretion to choose securities and to modify the asset mix, all within constraints, to add value. The manager's Investment Policy Statement is attached to this document as Appendix A.
- (4) Managers shall be appointed by the Trustees, when satisfied as to their suitability and competence to act as agents for the Fund. The Trustees shall also make any Manager changes, from time to time, as are deemed in the best interest of the Fund and its beneficiaries. To be considered for appointment, an Investment Manager should have a suitable investment approach, demonstrated financial stability, low turnover of personnel, capacity to undertake the account, performance record of at least two years and relevant experience and expertise.

6. DEGREE OF RISK AND DIVERSIFICATION

- (1) The basic philosophy is that the Pension Fund should earn the highest rate of return possible subject to an acceptable level of risk. Risk, in this case, is the inability of the Plan to pay the target level of benefits.
- (2) The investment objectives for the Fund have been reviewed with regard to the risk tolerance of the Trustees and characteristics of the Plan. The primary observations are:
 - (a) The current contributions plus investment income are expected to exceed funds required to provide pension payments, transfer values, benefit payments and expenses for the foreseeable future. It is unlikely that investments will have to be realized to provide for benefits, in the next decade provided that the industry remains viable.
 - (b) As of the most recent valuation date of January 1, 1998, the total funded ratio of actuarial value of the assets to the value of the defined benefit liability for the Plan on a funding basis was in excess of 100%. The Plan's solvency ratio was 1.0.
 - (c) The defined benefit liabilities for retired Members account for slightly above 45% of the Plan's accrued liabilities on a funding basis at January 1, 1998.
- (3) In view of the nature of the Plan's liabilities and the financial position of the Plan, an average degree of risk may be accepted in the Fund's investments in pursuit of long-term returns.

- (4) Risk of price fluctuations within the asset classes and the uncertainty of future economic and investment conditions, dictate prudent diversification through investment in asset classes whose expected return correlations provide overall risk reduction for the Fund.
- (5) In order to ensure benefit payments can be made in a timely manner, the Manager should structure the portfolio so that at least \$200,000 can be liquidated on three business days notice.
- (6) In respect of all monies allocated by the Trustees from the Fund for investment by the Manager, the following principles apply:
 - (a) Investment decisions shall be made without distinction between principal and income, and viewing the realization of gains or losses only in terms of the investment factors involved; and
 - (b) Selection of investments shall be made in the context of the total portfolio managed by the Manager, without undue risk of loss or impairment and with a reasonable expectation of fair return or appreciation given the nature of the investment.

7. PERMITTED CATEGORIES OF INVESTMENT

- (1) Subject to other provisions of this Policy, the Fund may be invested in any or all of the following asset categories and subcategories of investments.
 - (a) common stocks, convertible debentures or preferred securities;
 - (b) bonds, debentures, mortgages, notes or other debt instruments issued or guaranteed by any government, government agency, or corporation;
 - (c) private placements, whether debt or equity, of governments, government agencies or corporations;
 - (d) securities, whether debt or equity, of private companies;
 - (e) mortgages on real estate;
 - (f) investments or participation rights in venture capital;
 - (g) real estate, whether purchased directly, or through pooled funds, or through participating debentures or shares of corporations or partnerships formed to invest in real estate for pension funds;

- (h) natural resource properties or participation rights whether purchased directly, or through closed or open-end pooled funds, or through participating debentures or shares of corporations or partnerships formed to invest in natural resources properties for pension funds;
 - (i) guaranteed investment contracts or equivalent of insurance companies, trust companies, banks or other eligible issuers, or funds which invest primarily in such instruments;
 - (j) annuities, deposit administration contracts or other similar instruments regulated by the Insurance Companies Act (Canada) or comparable provincial law, as amended from time to time;
 - (k) term deposits or similar instruments issued or unconditionally guaranteed by trust companies or banks;
 - (l) cash, or money market securities issued by governments, government agencies or corporations; and
 - (m) mutual, pooled or segregated funds and limited partnerships, which may invest in any or all of the above instruments or assets, that are managed by the Manager and are eligible for Canadian registered pension plans.
- (2) No investment shall be made which is not permitted by the Income Tax Act of Canada or the British Columbia Pension Benefits Standards Act, as amended from time to time.
- (3) The Manager shall ensure that the total book value of investments in foreign property, as defined by the Income Tax Act of Canada ("ITA") does not exceed, at any time, the maximum allowable under the ITA. Such investments shall be made so that no amount of income tax becomes payable.
- (4) The Fund may utilize derivative financial instruments, provided that such participation is not for speculative purposes, and that they are only used in ways that are consistent with the Fund's investment objectives. The Trustees must specifically approve their use.
- (5) The Fund may not invest in commodities or derivative instruments related thereto, or in collectibles.
- (6) The Manager shall not, without written permission of the Trustees:
- (a) Purchase any asset or security previously disqualified by the Trustees in written notice to the Manager; or

- (b) Engage in the purchase or sale of options or futures, except for a covered call or hedging strategy under a structured program approved by the Trustees or, in the case of index options, where they are used to deploy cash quickly for short periods of time.

8. INVESTMENT MANAGER MANDATES

- (1) The Trustees have retained one balanced fund manager to manage the fund. The Manager will manage the fund prudently and unless provided with specific instructions from the Trustees, will have full discretion relating to security selection and asset mix, subject to the constraints contained in this document.
- (2) In view of the foregoing, the "normal" policy allocation for the total Fund, the associated range of strategic deviation, and the benchmark portfolio, are as follows:

Asset Allocation Ranges	Minimum	Maximum	Benchmark
Canadian Equities	30%	40%	35%
U.S. Equities	5%	30%	12.5%
Non-North American	5%	30%	12.5%
Total Equities	50%	70%	60%
Non-public Real Estate			
Investments	0%	5%	0%
Bonds	30%	40%	35%
Money Market	0%	15%	5%
Non-public Mortgage			
Investments	0%	5%	0%

The Indices that apply to the benchmark outlined above are as follows:

<u>Asset Class</u>	<u>Index</u>
Canadian Equities	TSE300 Total Return
U.S. Equities	S&P500 Total Return (CD\$)
International Equities	Morgan Stanley EAFE Net (CD\$)
Bonds	Scotia Capital Markets Universe
Money Market	Scotia Capital 30 Day T-Bills

- (3) The time weighted return on the portfolio for the Manager, net of any pooled or mutual fund direct expenses and transaction costs but before Manager fees, will be compared with the benchmark plus 1.0% per annum over moving 4-year periods.
- (4) The Manager will not be held responsible for the underperformance of the total fund, if the source of the underperformance is a result of returns of the non-public real estate and/or mortgage investments.

9. PORTFOLIO DIVERSIFICATION

- (1) Within each asset class, there will be a prudent level of diversification subject to the following limits, based on market value.

(A) Equities

In respect of the total content of the Fund,

- (a) not more than 10% shall be invested in the common stock, preferred shares or other equity issues of any one corporation,
- (b) up to 10% of the total equity holdings can be invested in private placements, so long as the issues are done by an existing publicly traded company and so long as the issuers have committed to getting the new shares listed on a recognized stock exchange within a reasonable time frame.
- (c) any non-North American holdings shall be broadly diversified by region, country and industry, and
- (d) all securities held in the portfolio will be publicly traded securities with the exception of special warrants and initial public offerings which are intended to be converted into publically traded securities within six months of the time of purchase. Special warrants and initial public offerings will not, in total, comprise more than 10% of the maximum allowable Canadian equity portion of the total fund, and
- (e) under normal conditions the portfolio will not invest in TIPS or HIPS or similar securities designed to parallel TSE stock indices or SPDRs or similar securities designed to parallel the S&P 500. However when large cash flows or major sales of portfolio holdings result in a portfolio being "underexposed" to either Canadian or US equities, a temporary investment in such securities may be made.

(B) Bonds

(a) Quality

In respect of the total fixed income content of the Fund:

- (i) not more than 10% shall be invested in the debt issues of any issuer, except for securities of or fully guaranteed by the Government of Canada or a province of Canada having at least an A(low) credit rating; and
- (ii) a maximum 10% of the fixed income portfolio can be in issues having a debt rating of less than A(low), but in no case can an issue be rated less than BBB.
- (iii) The dollar-weighted average rating of the bond holdings shall be at least single A or equivalent.

The above limits will be applied with some temporary latitude in the event of the down-rating of a security.

(b) Duration

The Manager will ensure that at any time, the duration of the bond portfolio is within three years of the duration of the Scotia Capital Markets Universe Bond Index.

(c) Diversification

The Manager shall diversify the portfolio appropriately. Any private placement held within the fixed income component of the portfolio shall have at least \$100 million outstanding and be broadly distributed

(C) Mortgages

Mortgage investments can be made through either segregated or pooled fund vehicles. Only first mortgages, to a limit of 75% of the market value of the property, on good credit risks will be allowed. Mortgages must be on new construction and have a government guarantee. Any non-publicly traded mortgage investments of the Fund must be approved in advance by the Trustees.

(D) Short Term Paper

- (a) be invested in readily liquidated securities with a term to maturity (or in the case of floating rate securities, to interest rate re-establishment) of no more than one year, or held in cash.

(b) All short term investments shall have a minimum rating by DBRS (Dominion Bond Rating Service) R-1(low), or equivalent.

(c) Individual Corporate short term investments shall be limited to a maximum of 10% of the combined total of the bond portfolio and cash equivalents.

(E) Real Estate

Real estate investments can be made through either segregated or pooled funds. Real estate holdings must be income producing only. Any non-publicly traded real estate investments of the Fund must be approved in advance by the Trustees.

(2) These limits apply to all Fund managers for any portion of the Fund under their administration.

(3) The Manager must justify in writing to the Trustees the reason for any position that is contrary to the limits imposed by this document. A contravention of the limits will be expected to be short term.

(4) All of the foregoing is subject to compliance at all times with investment restrictions required by law.

10. VALUATION OF INVESTMENTS

(1) Investments in publicly traded securities shall be valued no less frequently than monthly at their market value.

(2) Investment in pooled funds comprising publicly traded securities shall be valued according to the unit values published at least monthly by the pooled fund manager.

(3) If a market valuation of the investment, excluding real estate, is not readily available, then a fair value shall be determined by the Manager. For each such non-traded investment, an estimate of fair value shall be supplied to the Fund Custodian not less frequently than quarterly. In all cases, the methodology should be applied consistently over time.

(4) The Trustees shall be provided with a qualified independent appraiser's evaluation of all non-traded investments not less frequently than every three years, or annually where the investment represents more than 2% of the Fund.

11. RESPONSIBILITIES OF THE MANAGER

(1) Subject to the constraints of this document, the general responsibilities of the Manager are as follows:

- (a) Exercising full investment discretion within this mandate;
- (b) Provide the rate of return required in section (4)(b);
- (c) Providing to the Trustees, statements of portfolio investments, including any special warrants and initial public offerings and a written commentary on economic and investment conditions, at least quarterly;
- (d) Presenting to the Trustees, on a quarterly basis, in person or in writing, the Manager's outlook for the relevant capital markets, and based upon these expectations, a proposed investment strategy for the following twelve to twenty-four month period;
- (d) Providing to the Trustees annually, a written confirmation of compliance with this Statement up to the end of the most recent quarter;
- (e) Notifying the Trustees promptly in writing of any significant changes in investment philosophy, personnel, corporate organization, or financial stability;
- (f) Notifying the Trustees of any non-compliance with this mandate, as it occurs. If the Manager seeks a continuing variation from the Policy or this mandate, the Manager shall request written approval from the Trustees; and
- (g) Informing the Trustees in writing if the Manager at any time feels that the performance expectations cannot be met, or that any guidelines or restrictions are imprudent, or that these restrict performance to a greater extent than is necessary to meet risk and liquidity constraints.

(2) The Manager shall invest his portion of the portfolio solely in accordance with the Asset Allocation and Portfolio Diversification guidelines set out in Sections 7 and 8 of this Statement.

12. CONFLICTS OF INTEREST

- (1) A conflict of interest, whether actual or perceived, is defined for the purposes of this Policy as any event in which a Participating Company, the Trustees, an Employee of a Participating Company, any Manager or delegate, the Custodian, or any party directly related to any of the foregoing, may benefit materially from knowledge of, participation in, or by virtue of, an investment decision or holding of the Fund.
- (2) Should a conflict of interest arise, the party in the actual or perceived conflict, or any person who becomes aware of a conflict of interest situation, shall immediately disclose the conflict to the Trustees. Any such party will thereafter abstain from decision-making with respect to the area of conflict, and a written record of the conflict shall be maintained by the Trustees.
- (3) No part of the Fund shall be loaned to any Participating Company, employee of a Participating Company or any Trustee, or any legal person owned or controlled by any of the aforementioned.
- (4) The Trustees shall satisfy themselves that an appropriate policy regarding conflicts of interest exists and is followed by any Manager appointed by the Trustees. As a minimum, the Code of Ethics and Standards of Professional Conduct adopted by the Association of Investment Management and Research shall be expected to apply to all Managers.

13. MONITORING

- (1) The Trustees shall be prepared to meet at least semi-annually to:
 - (a) review the assets and net cash flow of the Fund;
 - (b) review the current economic outlook and investment plans of the Manager;
 - (c) review the current asset mix of the Fund, and subject to Section 15.1, take any action necessary to ensure compliance with this Policy; and
 - (d) receive and consider statistics on the investment performance of the Fund.
- (2) The Trustees shall monitor the performance of the Manager; such monitoring will include, but not be limited to, semi-annual meetings and ongoing evaluation of performance relative to standards appropriate to the Manager's

mandate. The Trustees will also monitor the Manager's turnover of personnel, consistency of style, discipline in portfolio construction, and record of service.

- (3) The Trustees shall monitor, or cause to be monitored, the contents of any pooled fund portfolios for their degree of compliance with the expectations contained in this Statement. They may make or cause to be made such changes in their choice of pooled funds as are deemed appropriate to meet the objectives of this Policy.
- (4) The Manager need not be faulted for underperforming the benchmark over short periods. On the other hand, significant short-term underperformance may make it unlikely that the full period objective will be achieved.
- (5) Returns below the minimum, or consistently below the benchmark, will require detailed explanation by the Manager and may result in the Manager's termination.

14. LOANS AND BORROWING

- (1) No part of the Fund shall be loaned to any person, partnership or association as stated in Section 12 (1) except as may be determined permissible by the Trustees as provided in this Section, or through the purchase of eligible investments as described in Section 6 (1).
- (2) The Trustees may approve the lending of securities through the Fund Custodian, subject to applicable legislation and provided that a minimum liquid, high quality collateral coverage of at least 105% of the current market value of the loaned securities is maintained at all times, or such other standard as may be directed by the Director of the Office of Financial Institutions in Canada.
- (3) Neither the Trustees nor the Manager may pledge, hypothecate, or otherwise encumber in any way, the assets of the Fund, except to the extent that temporary overdrafts occur in the normal course of business.
- (4) The Trustees shall not borrow on behalf of the Fund except to a limited and temporary extent for the timely payment of Plan benefits or administrative costs.
- (5) No Manager shall purchase securities on margin or engage in short sales.

15. VOTING RIGHTS

- (1) The responsibility for exercising and directing voting rights acquired through Fund investments shall normally be delegated to the Manager, who shall at all times act prudently and in the best interests of the Fund and its beneficiaries.

- (2) The Trustees reserve the right to direct, or override, the voting decision of the Manager, if in its view, such action is in the best interests of the Fund and its beneficiaries. If they intend to do so, they shall inform the Manager in writing within a reasonable period of time.
- (3) It is recognized, however, that the above constraints and policy on voting rights are not enforceable to the extent that the Fund is invested in pooled funds.

16. POLICY REVIEW

- (1) This Policy shall be reviewed by the Trustees at least annually, but otherwise whenever a major change is necessary. Such review may be caused by:
 - (a) a fundamental change in the benefit design of the Plan;
 - (b) significant revisions to the expected long-term trade-off between risk and reward on key asset classes, normally dependent upon basic economic/political/social factors;
 - (c) a major change in the actuarial calculation basis, the membership/liability distribution, or the contribution/expense expectation;
 - (d) shortcomings of the Policy that emerge in its practical application, or substantive modifications that are recommended to the Trustees by a Manager; and
 - (e) applicable changes in legislation.

Approved and adopted by the Victoria Mechanical Industry Pension Fund Trustees at Vancouver, BC, this 8th day of November, **2000**, with an effective Date of **January 1, 2001**.

B. Benefit Policy

C. Funding Policy

Part 3C: Operational Policies

A. Alternative Trustee Policy

Contemplated:

- Increase the Board size to 8 members, leaving the quorum at 4
- Either have 2 alternatives with voice but no vote and education opportunities for a one-year training period
- Or have two alternatives with voice, who would vote when a regular trustee was not available to complete quorum. Education opportunities would be provided.

B. Communication Policy

- Once a year the Trustees will provide members with a newsletter, which will include the names of all Trustees, as well as an individual Annual Statement from Administrator.
- At least every 3 years, Administrator and Investment Managers will be invited to special meeting of all Plan members and their spouses.
- Trustees will disclose any changes to plan as frequently as required and disclose plan expenses.
- All communications to the Board and membership will use plain language and will include an explanation of any uncommon terms.
- There will be transparency and accountability in reporting, respecting an individual's privacy rights.
- Quarterly reports will be required from the money manager. The Trustees require that these reports be written in simple, easy-to-understand language.

C. Conflict of Interest Policy

- A conflict of interest, whether actual or perceived, is defined for the purposes of the Policy as an event in which a Trustee or any party directly related to the Trustee may benefit materially from knowledge of, participation in, or by virtue of a decision of the Board.
- It shall be the duty and responsibility of all Trustees to avoid conflicts of interest
- If it is not possible for a Trustee to avoid a conflict of interest, the Trustee so conflicted shall immediately declare the conflict.
- The conflicted Trustee shall be excused from any portion of a meeting of the Board of Trustees where the issue giving rise to the conflict is being discussed.
- The conflicted Trustee will not be entitled to vote on the issue subject to the conflict.
- The conflicted Trustee will agree not to attempt to influence the decision of the remaining Trustees outside of the Board of Trustees meetings.
- A Trustee who is unable or unwilling to comply with this policy shall immediately resign from his/her position as a Trustee.

D. Delinquency Control Policy

It is understood that:

- One day is considered delinquent
- The Trustees ask that an attempt to impose participation agreement on employers be included as a collective bargaining item.
- The plan will encourage the Business Managers to use all available means to collect outstanding contributions in the most timely manner possible.

The following course of action will be followed in the event of a delinquency:

1. The Business Manager may notify the Members that their benefits have not been paid and action has been commenced against the employer
2. The Administrator will inform the trustees of delinquencies on a monthly basis
3. The Administrator to follow up with Employers when a contribution report is delinquent.
4. Notice of delinquency and penalties applied to be sent to the employer by the 15th of the month following the date that the contributions should have been received
5. The Union will initiate the grievance procedure following notification at their discretion.
6. The Union will inform the Trustees if the grievance procedure has been initiated.
7. The Trustees will initiate legal action against a delinquent employer after all other efforts to collect the contributions have failed.

E. Dispute Resolution Policy

- Disputes between Trustees will be settled according to the procedure outlined in the Trust Agreement
- With respect to complaints from members
 - If a letter of complain is received by any supplier, it must be brought to the attention of the Board as soon as possible along with the status of the resolution
 - The Board will work to address service problems by any supplier before removing them
 - Members complaining will be made aware of the fact that written complaints will be entertained by the Board.

F. Document Policy

- Trustees will each hold copies of all foundation documents
- Documents required by regulatory bodies shall be filed in a timely manner
- Members shall have access within a reasonable amount of time not to exceed 30 days to all plan documents including minutes which have been altered to protect the privacy of individuals
- All documents that the trustees require for proper management of the plan will be held by the Administrator
- Members will have access to the documents, subject to Trustee approval and respecting privacy considerations.
- The Board will endeavor to have all foundation documents on the website including:
 - Plan text
 - Plan booklet
 - Statement of Investment Policies and Procedures
 - Policy handbook
 - Audited Financial Statements
 - Triennial Actuarial Report
 - Privacy Policy
- Links to the BC Pension Benefits Standards Act, the Personal Information Protection Act of BC and the Income Tax Act will be available on the UA Local 324 website

G. Document Retention Policy

- An archive of all documents will be retained by the Plan Administrator
 - Minutes will be retained permanently
 - All others will be retained for the lesser of
 - The time frame required by statute, or
 - 7 years.

- All property belonging to the Plan and held by the Trustee will be passed on to new Trustees upon resignation of a prior Trustee

- Trustees should be aware of their duty of care with their documents and destroy them when their purpose for having them is fulfilled

H. Education Policy

- The Plan will require that all Trustees be provided with opportunities to attend educational conferences and seminars
- Conferences and seminars may be local or out of town
- The cost of educational programs will be borne by the trust and subject to prior Trustee approval
- The reasonable costs of attending the conferences or seminars will be paid by the Trust giving consideration to the overall asset base of the plan
- The Trust will require proof of attendance at the seminar or conference, otherwise the Trustee will be required to reimburse the Trust. The Trustees may use their discretion with respect to requiring reimbursement in the event of a certified emergency.
- Trustee attending conferences/meetings will report back to the Board.
- New Trustees will be encouraged to take the IFEBP's New Trustee course in the first year of their membership on the Board
- The Board will encourage all Trustees and the Administrator to take the IFEBP's ATMS courses
- At least two Trustees per year will be send to educational courses or conferences such as the IFEBP's Canadian Annual Conference

I. Expense & Travel Policy

- All expense authorizations will be signed by 2 Trustees.
- The Trust shall require receipts in support of all Trustee expenses
- A per diem of \$150 per day in the currency of the country in which the event is held is determined to be reasonable by the Trustees to cover incidental expenses of Trustees attending educational conferences or seminars
- When travelling out-of-town, the Trustees will be reimbursed for airfare costs up to a maximum of full fare economy airfare
- When using their private vehicle to travel to a conference or seminar, the Trustees may charge 40 cents per kilometre, subject to a maximum charge no greater than the regular full fare round trip economy airfare to the same location
- On the financial statements the Trust will allocate $\frac{1}{4}$ of 1% of Plan assets to cover educational costs to a maximum of \$30,000 per annum
- “Borrowing” forward from one year to the next, will not be permitted
- Actual wage loss will be reimbursed

J. Internal Fund Operation and Control Policy

- The Trustees will meet quarterly
 - Dates for all the quarterly meetings will be set in advance at the last meeting of the year
- There will be an annual audit of the books
- Trustees required 2 signatures on all benefit and expense payments
 - For expense payments, two (2) Trustees' signatures will be required
 - For benefit payments, the signature of the Administrator and one Trustee signature will be required
- The Trustees, in consultation with the Administrator, will develop a checklist of all deadlines that need to be met
- The Trustees will require certifications of compliance that all filings have been completed

K. Minute Distribution Policy

- The Administrator will take the Minutes of the Board meetings
- Minutes will be distributed to:
 - All Trustees
 - Administrator
 - Actuary
 - Auditor
 - Investment Manager (relevant parts only)
- The Union President will be informed where the Minutes Books are kept
- Privacy issues must be observed
- Minutes will be distributed within 30 days of the meeting to which they pertain.
- Personal names are not to be read out at union meetings
- The Administrator will report at each subsequent meeting that distribution was satisfied.

L. Privacy Policy

U.A. LOCAL 324 PROTECTION OF PRIVACY POLICY

U.A. Local 324 respects the privacy of its members and is committed to protecting the privacy of the personal information we gather and retain for administrative purposes, while allowing reasonable access and/or exchange of information between limited parties with whom the Local Union is professionally engaged. Local 324 will comply with Provincially and Federally legislated Privacy Acts(s) to ensure that our member's information is used for authorized purposes only. Local 324 will not be responsible for any actions of third parties once the information is exchanged.

COLLECTION AND USE OF PERSONAL INFORMATION

Local 324 collects personal information that is required for proper administration of the Union and will include;

Members Name	Names of family members
Members Birth date	Birth dates of family members
Social Insurance Number	Home address/ mailing address
Phone/Fax Number	Email Address
Emergency Contact names and numbers	Benefit Plan Information
Beneficiary & Life Insurance information	Trade Qualifications
Wage Rates / Earnings	Past Employment History

Additional information may be collected should a member become involved in a grievance, labour relations board application, workers compensation board appeals, employment insurance appeals, employment standards complaints or trial.

DISCLOSURE - Some or all of your personal information may be disclosed to approved third parties:

- Where the Local Union is required by law to obtain, maintain, and report information to government bodies, such as Canada Customs and Revenue Agency (CCRA) or other legal or administrative proceedings.
- Where proceedings with grievances, arbitration, mediation, litigation or settlement of any disputes or issues exist between the Local Union and Employer, or the B.C. Labour Relations Board.
- Where required by law
- Where the U.A. International Office requires updating of member information/status
- Where Employers seek trade qualifications and employment histories
- Where the Union Benefit Plan Providers require information
- Where an individual member authorizes release of personal information to a specified party
- For identification purposes a member's social insurance number is authorized for use as an "identity number" within the union membership administration program to post all Employer deducted dues and remittances; and by the Union's Benefit Plans (Health & Welfare and Pension) for identification purposes and for the purposes of reporting to Income tax office.

- Local 324 does not disclose personal information to other members or to any other person, agency or organization without obtaining separate and express permission to do so by the member.

CONSENT - By providing U.A. Local 324 with your personal information on file, a member consents to the disclosure and utilization of their records for the purposes mentioned herein. The Unions' membership administration system program was established, is maintained and is backed up daily by Edge Computing Corp. Edge Computing Corp will not retain or disclose any personal information contained in this data. It is the member's responsibility to ensure that personal information provided to the Union is correct and up to date.

ACCESS TO PERSONAL INFORMATION - Upon request, all members shall have access to all personal information held. The Union reserves the right to refuse requests in situations where disclosure of information; may be protected legally, could harm the position of the organization, would reveal personal information about another individual, or where the information is generated for the purpose of a mediation/arbitration or court hearing of a confidential nature.

WITHDRAWAL OF CONSENT - A member may withdraw consent to the use and disclosure of personal information at any time. However, withdrawal of such information may limit or prevent aspects of membership within the Local Union.

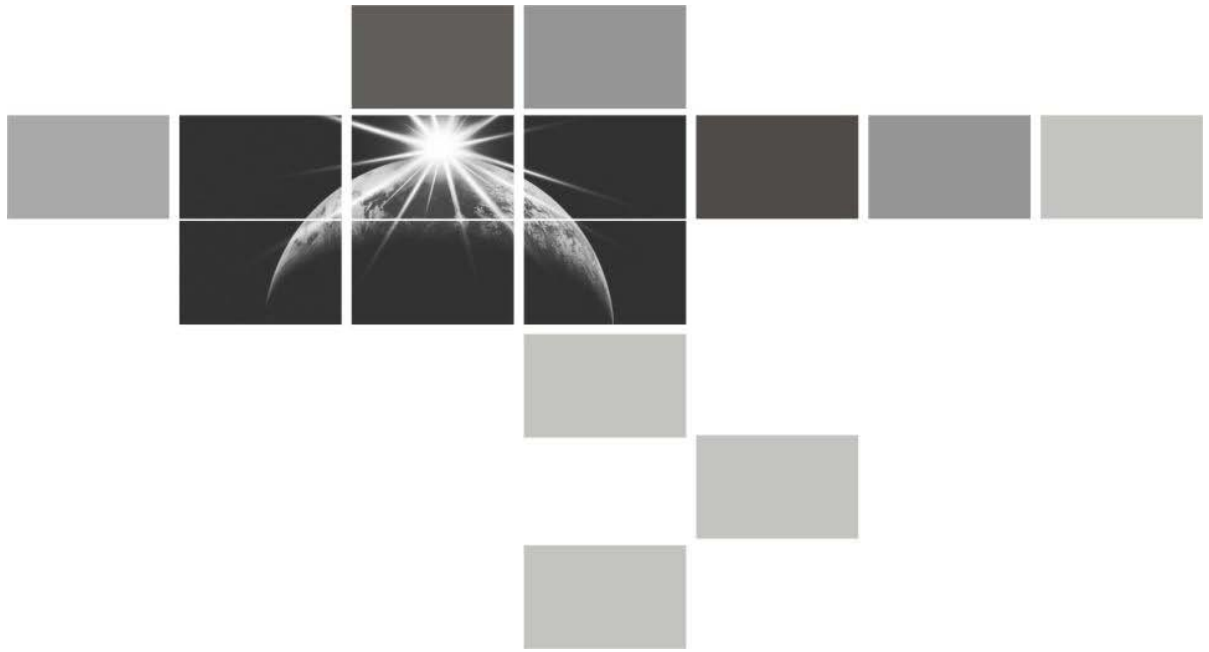
PRIVACY OFFICER - All information pertaining to the policies and practices established by U.A. Local 324 are available for review. A Privacy Officer has been designated and may be reached by contacting the Union office.

M. Trustee Appointment Policy

- The Plan's trust agreement requires that the Union or VMIRA appoints all trustees
- The trust document requires that the Chair of the Board is a Union Trustee.
- The Pension Plan will encourage a new trustee to attend a training program within the first two years after their appointment to the Board.

Part 3D: Plan Interpretations

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Part 4

Supervision

Part 4: Supervision

A. Settlor

Objective / Standard	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
1. Review their responsibilities under the Trust	Trustees / manager/union	Board of trustees		3	
2. Review and update Trust Agreement	Trustees settlors	Trustees	No	3	Provide trust agreement registered
3. Appoint proper Trustees	Settlors	Trustees		Long term	Certified resolution
4. Allow Trustees to function independently	Settlors	Trustees	No	3	Confirmation letter
5. Uphold principle of non-alignment of Trustees	Settlors	Trustees	No	3	
6. Publicly support the Trustees	Settlors	Trustees	No		

Objective / Standard	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
7. Uphold requirements of the governance plan	Settlors				
8. Remove Trustees only for non-political reasons	Settlors				
9. Provide Trustees with sufficient time off with pay to attend to the affairs of the trust	Settlors				
10. Develop and maintain a succession plan for Trustees	Settlors & trustee				
11. Recognize their fiduciary responsibilities	Settlors & trustee				
12. Uphold statutory obligations	Trustee				
13. Act without conflict of interest	Settlors				
14. Other?					

B. Trustees

Objective / Standard	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
1. Adhere to the Trustee Code of Conduct					
2. Meet regularly					
3. Monitor individual trustee meeting attendance					
4. Spend adequate time on meeting preparation					
5. Spend adequate time on training					
6. Perform subcommittee work as needed					
7. Review appointment of trustees					

Objective / Standard	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
8. Develop and review governance plan including Policy Handbook					
9. Review best practice standard					
10. Review Investment Policy Statement					
11. Review Funding Policy					
12. Review Benefit Policy					
13. Monitor employer compliance with the Collective Agreement					
14. Monitor agents					
15. Communicate with members					

Objective / Standard	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
16. Act in the best interest of the beneficiaries					
17. Treat members impartially with loyalty					
18. Recognize fiduciary responsibilities					
19. Uphold statutory obligations					
20. Act with the duty, care, skill and diligence of a prudent person					
21. Interpret the terms of the plan fairly, impartially and in good faith					
22. Act without conflict of interest					
23. Uphold principle of non-alignment					
24. Other?					

C. Plan Administrator

Objective / Standard	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
1. Act in accordance with the Administration Agreement					
2. Attend Trustees meetings					
3. Spend adequate time on meeting preparation					
4. Spend adequate time on staff training					
5. Uphold requirements of the governance plan					
6. Maintain professional level of judgement and advice					
7. Provide leadership to the Board					

Objective / Standard	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
8. Provide education to the Trustees where appropriate					
9. Work with and coordinate work of the other advisors					
10. Provide adequate records and reporting					
11. Maintain the document library & policy handbook					
12. Monitor plan contributions and report on delinquencies					
13. Make regulatory filings					
14. Calculate benefits in accordance with latest Trustees approved basis					
15. Perform system checks to confirm accuracy of computer systems					

Objective / Standard	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
16. Communicate with members					
17. Treat members impartially					
18. Recognize fiduciary responsibilities					
19. Uphold statutory obligations					
20. Act with the duty, care, skill and diligence of a prudent person					
21. Interpret the terms of the plan fairly, impartially and in good faith					
22. Act without conflict of interest					
23. Other?					

D. Actuary / Consultant

Objective / Standard	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
1. Act in accordance with the Consulting Agreement					
2. Attend Trustees meetings as needed					
3. Spend adequate time on meeting preparation					
4. Uphold requirements of the governance plan					
5. Maintain professional level of judgement and advice					
6. Provide leadership to the Board					
7. Provide education to the Trustees where appropriate					

Objective / Standard	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
8. Work with the Board to develop Policy Handbook					
9. Work with the other advisors as needed					
10. Make regulatory filings as needed					
11. Treat members impartially					
12. Recognize fiduciary responsibilities					
13. Uphold statutory obligations					
14. Act with the duty, care, skill and diligence of a prudent person					
15. Interpret the terms of the plan fairly, impartially and in good faith					

Objective / Standard	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
16. Act without conflict of interest					
17. Other?					

E. Investment Manager

Objective / Standard	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
1. Act in accordance with the Investment Management Agreement					
2. Attend Trustees meetings as needed					
3. Spend adequate time on meeting preparation					
4. Uphold requirements of the governance plan					
5. Maintain professional level of judgement and advice					
6. Provide regular reports to the Board					
7. Work with the Trustees to develop the Investment Policy Statement					

Objective / Standard	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
8. Conform to the requirements of the Investment Policy Statement					
9. Report any non-compliance to the Investment Policy Statement as required					
10. Vote proxies as directed by the Board and report to Board					
11. Provide education to the Trustees where appropriate					
12. Work with the other advisors as needed					
13. Treat members impartially					
14. Recognize fiduciary responsibilities					
15. Uphold statutory obligations					

Objective / Standard	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
16. Act with the duty, care, skill and diligence of a prudent person					
17. Interpret the terms of the plan fairly, impartially and in good faith					
18. Act without conflict of interest					
19. Other?					

F. Custodian

Objective / Standard	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
1. Act in accordance with the Custodial Agreement					
2. Attend Trustees meetings as needed					
3. Uphold requirements of the governance plan					
4. Maintain professional level of judgement and advice					
5. Provide regular reports to the Board					
6. Provide education to the Trustees where appropriate					
7. Provide safekeeping of all the investments					

Objective / Standard	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
8. Execute appropriate documents					
9. Make regulatory filings as needed					
10. Pay benefits as directed					
11. Pay expenses as directed					
12. Monitor foreign investment limit					
13. Execute all changes to the investment portfolio as directed					
14. Work with the other advisors as needed					
15. Treat members impartially					

Objective / Standard	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
16. Recognize fiduciary responsibilities					
17. Uphold statutory obligations					
18. Act with the duty, care, skill and diligence of a prudent person					
19. Interpret the terms of the plan fairly, impartially and in good faith					
20. Act without conflict of interest					
21. Other?					

G. Auditor

Objective / Standard	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
1. Act in accordance with the Letter of Appointment					
2. Attend Trustees meetings as needed					
3. Spend adequate time on meeting preparation					
4. Uphold requirements of the governance plan					
5. Maintain professional level of judgement and advice					
6. Provide education to the Trustees where appropriate					
7. Provide an annual audit of the books of account					

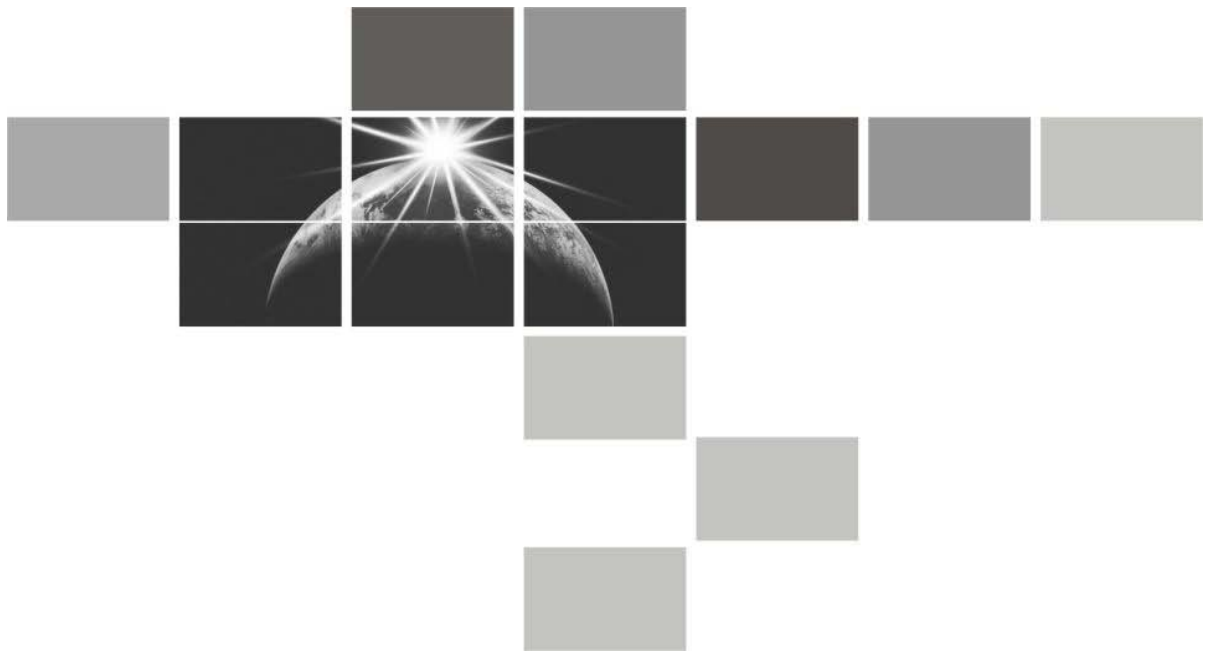
Objective / Standard	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
8. Report any irregularities to the Board					
9. Work with the other advisors as needed					
10. Make regulatory filings as needed					
11. Treat members impartially					
12. Recognize fiduciary responsibilities					
13. Uphold statutory obligations					
14. Act with the duty, care, skill and diligence of a prudent person					
15. Interpret the terms of the plan fairly, impartially and in good faith					

Objective / Standard	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
16. Act without conflict of interest					
17. Other?					

H. Legal Counsel

Objective / Standard	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
1. Act in accordance with the requirements of their appointment					
2. Provide legal opinions as required					
3. Provide education to the Trustees where appropriate					
4. Attend Trustees meetings as needed					
5. Spend adequate time on meeting preparation					
6. Uphold requirements of the governance plan					
7. Maintain professional level of judgement and advice					

Objective / Standard	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
8. Work with the other advisors as needed					
9. Make regulatory filings as needed					
10. Treat members impartially					
11. Recognize fiduciary responsibilities					
12. Uphold statutory obligations					
13. Act with the duty, care, skill and diligence of a prudent person					
14. Interpret the terms of the plan fairly, impartially and in good faith					
15. Act without conflict of interest					
16. Other?					



Part 5

Compliance

Part 5: Compliance

A. Regulatory/Audit Compliance

Requirement / Consideration	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
1. Annual Information Return Filing filed by June 30/03	Administration	Trustees	Yes	1	Certificate of compliance 1 st meeting after 06/30
2. Filing of auditor's report	Auditor	Trustees / administration	Yes	1	Report complete not later June 30 for filing
3. Actuarial report preparation and filing	Actuary	Trustees		1	Document June 30 270 days after evaluation September 15
4. Inform Regulator of Change in Trustees, advisors	Administration	Trustees		1	
5. Filing of collective agreements as necessary	Administration	Trustees		As necessary	
6. T3P pension	Auditor or administration	Trustees		1	Management

Requirement / Consideration	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
7. Filing of Plan amendments	Administration	Trustees		File within 30 days of amendment	
8. Preparation of plan booklet	Administration	Trustees		Review 3 years	
9. Annual member statement	Administration	Trustees		1	Certificate of statement 6 months
10. Termination statements	Administration	Trustees		As required	Report at each meeting
11. Filing of reciprocity agreements	Administration	Trustees		As required	Copy of receipt agreement
12. Tax receipts for benefit payments	Custodian	Trustee / administration		Yearly	File by
13. PA / PSPA / PAR Calculations and reporting N/A	Employer	Trustee / administration		Yearly	
14. Plan interpretations	Trustees	Administration		As required	Plan interpretation letter

Requirement / Consideration	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
15. Regulatory interpretations	Trustees	Administration		As required	File note
16. Terms of Reference for all parties in place	Trustees			As required	On contract renewal – signed contracts
17. Adherence to terms of reference by all parties	Administration	Trustees		Quarterly	
18. Privacy	Administration	Trustees		Annual certificate	Certificate
19. Other Terms of reference of trustees	Trustees	Trustees		Annual	

B. Funding Compliance

Requirement / Consideration	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
1. Contributions received in accordance of requirements of the collective agreements	Administration	Trustees		Every meeting	
2. Delinquency controls	Administration	Trustees		As required every meeting	
3. Review plan cash flow	Administration	Trustees		Every meeting	
4. Monitor plan expenses against budget	Administration	Trustees		Every meeting	
5. Establish target funding to provide adequate benefits	Actuary	Trustees		Annually	
6. Communicate funding needs to settlors	Trustees	Settlors		Annually	

Requirement / Consideration	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
7. Procedure to deal with below target contribution levels	Trustees	Administration / settlors / beneficiary		As required	
8. Annual audit	Auditor	Trustees		Annually	
9. Target surplus	Trustees	Investments manager		Annually	
10. Use of surplus	Trustees	Settlors & beneficiaries		Annually	
11. Other solvency report	Actuary	Trustees			
12. Funding	Administration	Trustees		Annually	
13. Future planning	Actuary	Trustee		Annually	
14. Fee review	Trustees			Contract renewal	
15. Fund administration cost	Administration	Trustees		Annually	

C. Benefit Compliance

Requirement / Consideration	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
1. Target benefit levels	Trustees	Settlers		Annually	
2. Target actuarial assumptions	Actuary	Trustees		Annually	
3. Early retirement subsidies rationale	Trustees	Settlers / beneficiaries		Annually	
4. Ancillary benefit rationale	Trustees	Settlers & beneficiaries			
5. Ensure accuracy of membership information	Administration / auditor	Trustees		Annually	
6. Ensure benefits paid in accordance with plan rules	Administration / auditor	Trustees		Annually	Certificate

Requirement / Consideration	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
7. Ensure benefit accuracy	Administration / custodian	Trustee / settlors		Annual	Certificate
8. Ensure timely payment of benefits	Administration / custodian	Trustee		Annual	Certificate
9. Ensure correct withholding of taxes	Custodian	Trustee / beneficiary			
10. Fraud control procedures	Auditor	Trustee			
11. Other					

D. Investment Compliance

Requirement / Consideration	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
1. Establish / review / revise Investment Policy Statement	Trustee	Money manager / custodian / actuary		Annual	
2. Establish / monitor fund objectives	Trustee	Settlor & beneficiary		Annual	Written statement
3. Establish / monitor asset mix	Trustee / investment advisor / actuary	Trustee		Annual	
4. Establish / monitor fund diversification					
5. Ensure sufficient liquidity	Actuary				
6. Outline investment manager mandate					
7. Establish / monitor manager objectives	Actuary	Trustee		Annual	Certificate

Requirement / Consideration	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
8. Reporting	Investment manager	Trustee		Annual	Certificate
9. Establish / monitor investment manager	Investment manager / consultant	Trustee		Quarterly	
10. Meeting venues					
11. Fees	Investment consultant	Trustee		Annual	Certificate
12. Notification of significant changes in personnel					
13. Other?					

E. Administrative Compliance

Requirement / Consideration	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
1. Ensure the operation of the governance system.					
2. Ensure that adequate independent checks are met.					
3. Review the performance of the various committees to ensure that they function accurately in					
4. Make recommendations to the Board for changes to the governance plan to ensure a smooth					
5. Governance audit					
6. Other?					

F. Third Party Compliance

Requirement / Consideration	Responsibility Of?	Reporting To?	Satisfied Now?	How Often?	Proof/Test
1. Establish objective benchmarks for the affairs of the trust which will be performed by third parties.					
2. Have these benchmarks agreed to and easily measurable.					
3. Monitor, review and revise the benchmarks to ensure that they are adequately addressed by third party					
4. Have processes in place in order to deal with under-performing third parties.					