



STRATEGIC COMMUNICATIONS PLAN

GREGORY W. SMITH, EXECUTIVE DIRECTOR



Increasing Awareness of PERA's Value to its Members and the Colorado Economy

Six initiatives in the Strategic Communications Plan

- » Social media
- » Employer Relations outreach
- » Business community outreach
- » Ambassador Program enhancements
- » Media efforts
- » Education community outreach



Developing Your Message

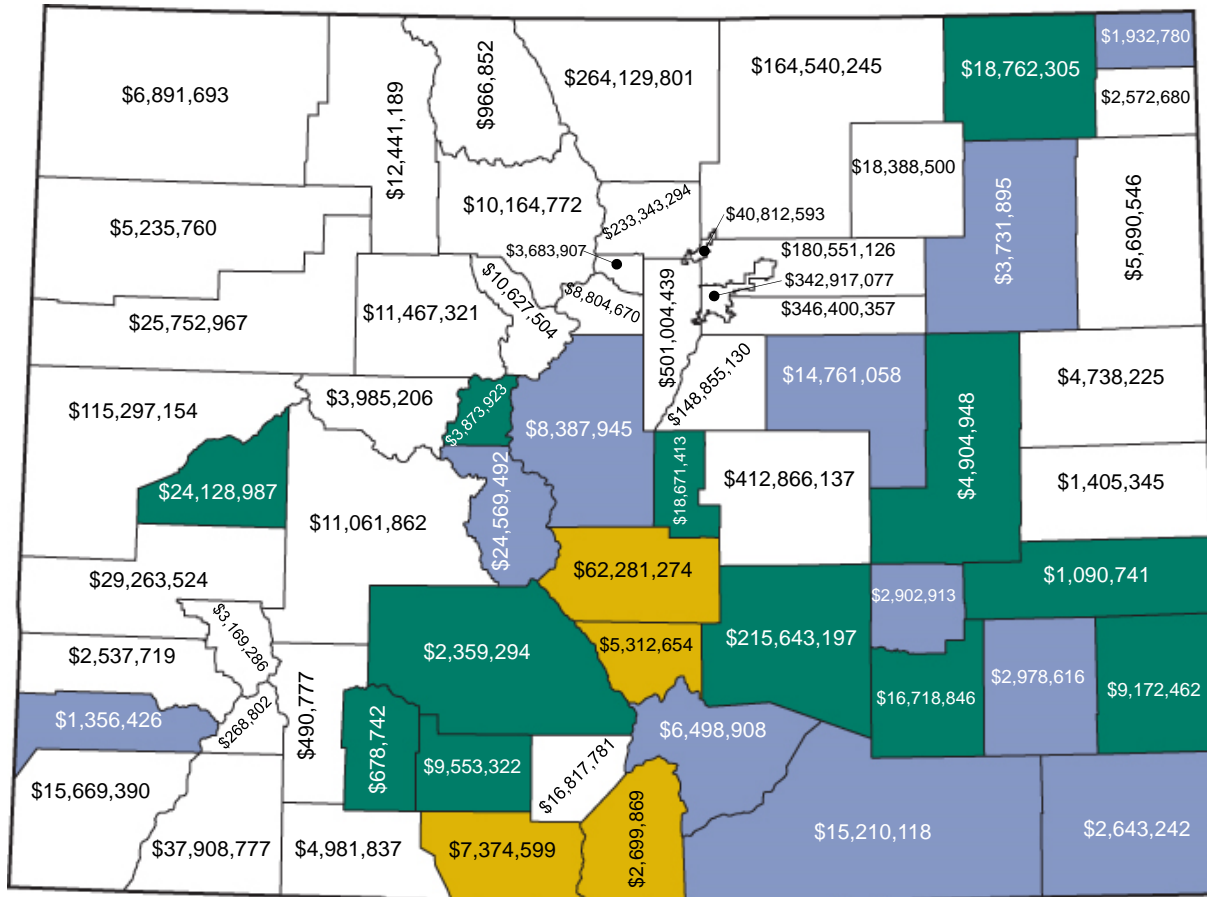
“One of Colorado’s Best Investments”

- » Hone in on impact to local communities
- » Highlight economic stability and impact
- » Recognize tax revenue and what that supports
- » Highlight value to every business
 - Retirement income
 - Quality of life
 - State/local services

PERA Benefit Distributions and Distributions Relative to Payroll by County

Total Distributions = \$3,506,760,242

- \$4.78 billion economic output
- 26,000 jobs statewide
- \$282.4 million state and local tax revenue



Over 25 percent of Payroll

15-25 percent of Payroll

10-15 percent of Payroll

Less than 10 percent of Payroll

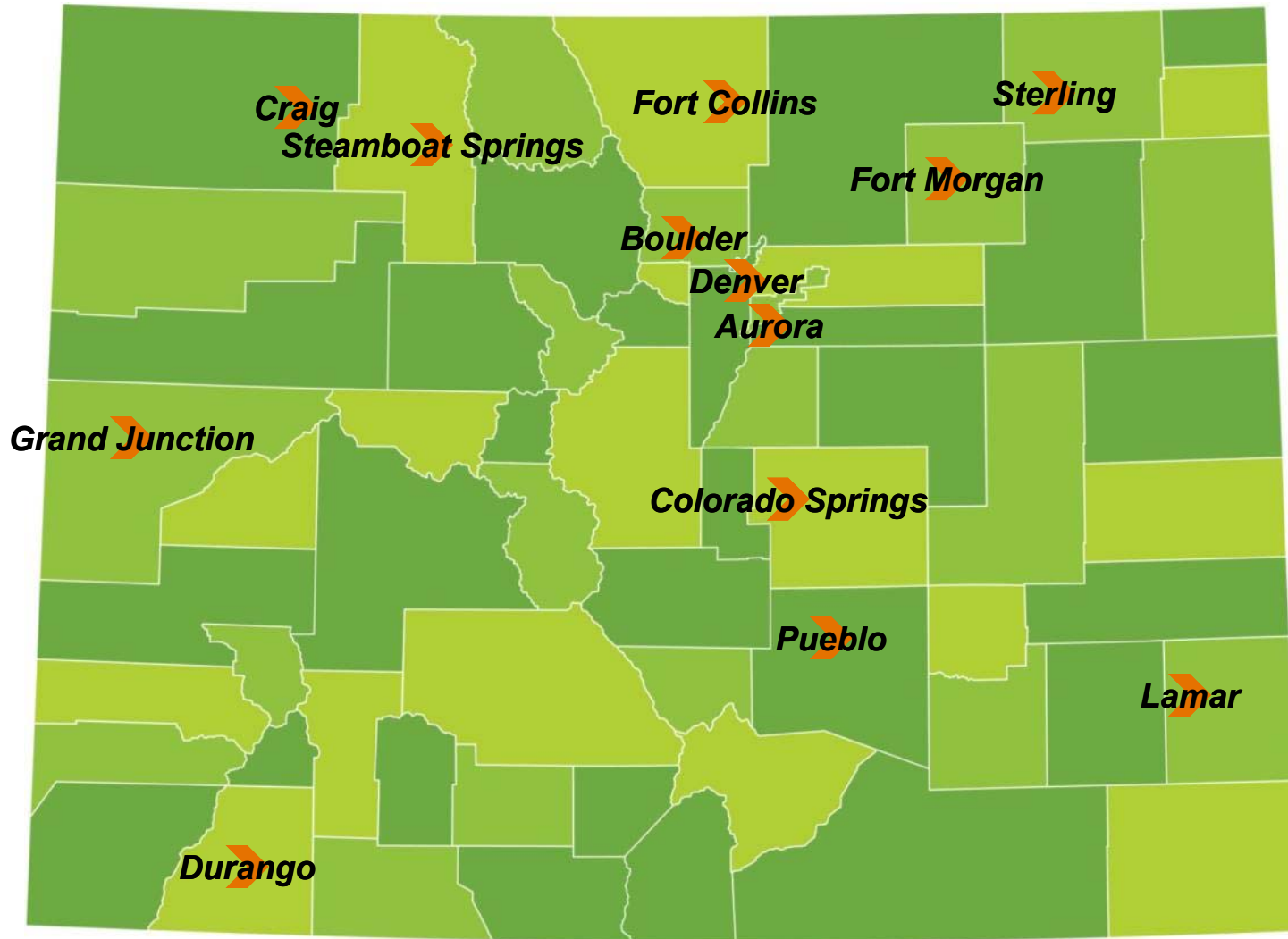
Percentage of payroll data from 2011 County Business Patterns, U.S. Census Bureau adjusted to 2013 dollars, calculation from Pacey & McNulty

Annual benefit payments as of December 31, 2014 (unaudited)



On the Road: Working for Colorado

March 2014–February 2015



Statewide Outreach Highlights

» Steamboat Springs and Craig

- August 11-12 and February 17
- Economic Development Corporation (EDC) and Chambers, Board of Education, newspaper editor, Kiwanis and Rotary Clubs, Routt and Moffatt County Commissioners



» Ft. Morgan and Sterling

- July 30
- Rotary Club, newspaper editor, EDC and Chamber, City Council

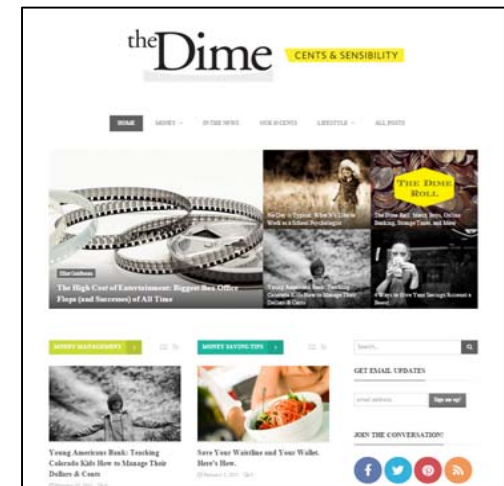
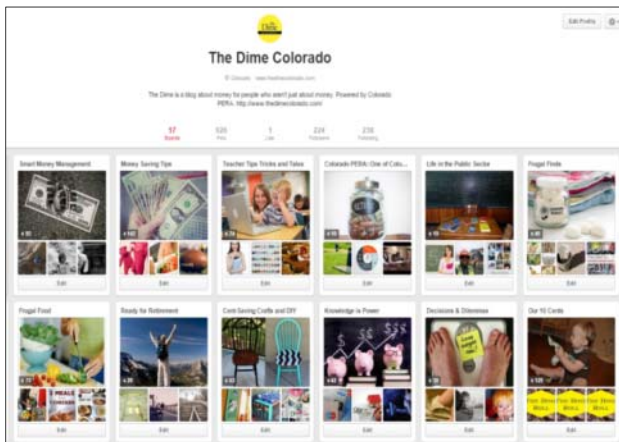
JOURNAL ADVOCATE

Executive director: PERA works for Colorado

Journal-Advocate staff writer STERLING — PERA (Public Employees' Retirement Association) works for Colorado. That was the message Gregory Smith, executive director of Colorado PERA, shared Wednesday at a Rotary Club meeting that was open to the public.



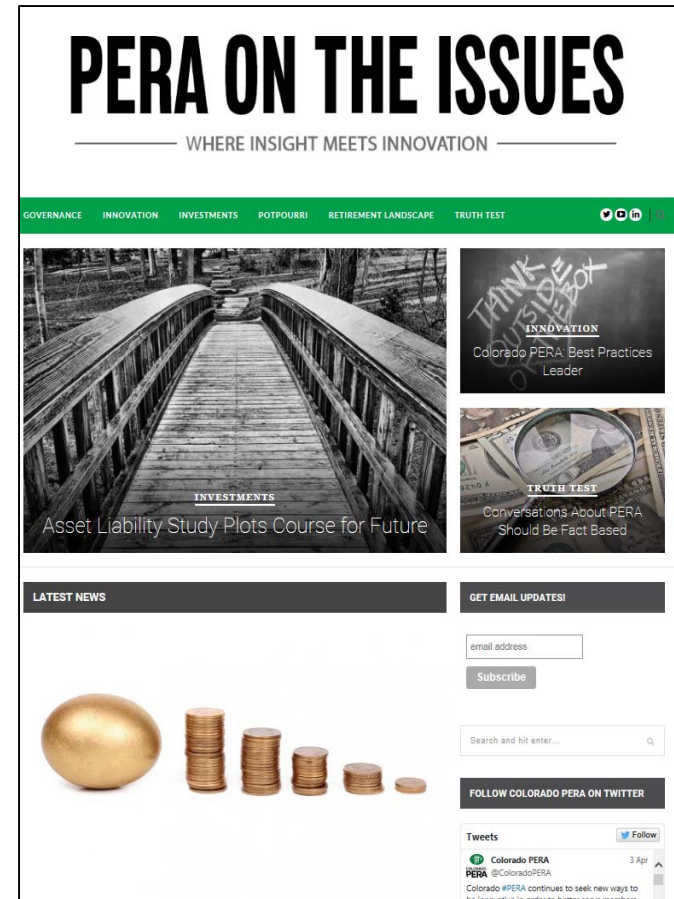
PERA Social Media: Engaging in Issues Relevant to Public Employees



PERA on the Issues (POTI)

Where Insight Meets Innovation

- » Provides information and insight on topics related to managing a portfolio of more than \$45 billion and providing retirement security for public employees
- » Recent articles
 - Colorado PERA: Best Practices Leader (audit of the actuary)
 - Colorado PERA's 2014–2018 Strategic Plan
 - Conversations about PERA Should Be Fact Based
 - Cautionary Tales: Case Studies Show How States Face Funding, Debt Challenges After Switching to Defined Contribution Retirement Plans
- » POTI workgroup composed of employees from across PERA



Legislative/Executive Branch Outreach

Our Work is Paying Off

“I really appreciate that advocacy effort from members of PERA to help me understand their circumstances.”

Sen. Chris Holbert (R-Parker) on Senate Floor, February 13



- » Legislative/Executive branch outreach
 - Joint Finance Committee
 - Legislative Audit Committee
 - Joint Budget Committee
 - Legislative update meetings
 - Governor’s office, Treasurer’s office, state and local government agencies
- » Employer Relations outreach
 - Steamboat Springs School District
 - Lamar School District
 - Colorado Mental Health Institute
 - Fort Morgan City Government
 - Northeast Junior College
 - City of Boulder

Business Community Outreach

PERA is a Sustainable Economic Engine

Chamber and Economic Development Council Contacts



DENVER
METRO
CHAMBER
OF COMMERCE



the chamber
DURANGO CHAMBER of COMMERCE

CENTER FOR IMPROVING
VALUE IN HEALTH CARE



JEFFERSON COUNTY
ECONOMIC DEVELOPMENT CORPORATION



AURORA
ECONOMIC DEVELOPMENT COUNCIL

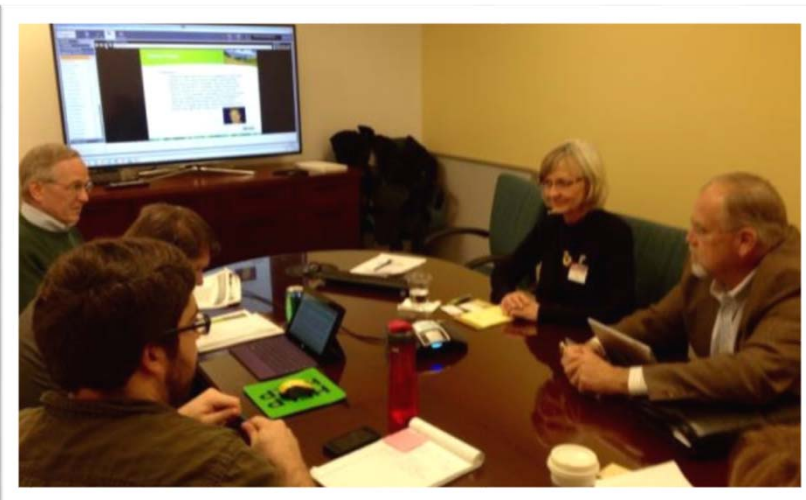
Action22 inc.
Giving voice to Southern Colorado



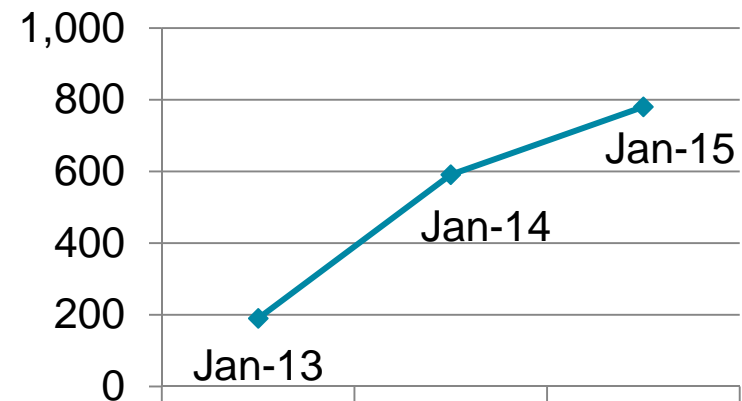
PERA Ambassadors

Your Future, Your Voice

- » 780 Ambassadors
- » 40 Ambassador trainings
 - 480 trained Ambassadors
- » Ambassador participation in “Working for Colorado” video
- » 60 Team Leaders
- » Monthly Team Leader webinars during legislative session



Ambassadors



**100%
coverage in
legislative
districts**



Highlights of Media Efforts 2014–2015

Colorado

THE DENVER POST
denverpost.com

Opinion August 1, 2014
“PERA welcomes a fresh look”
By Gregory W. Smith
Guest Commentary

STEAMBOAT
PILOT
& TODAY

The Gazette
gazette.com

DENVER
BUSINESS JOURNAL

COLORADO SPRINGS
Independent

THE DURANGO HERALD

COLORADO
PUBLIC RADIO

THE DAILY
SENTINEL

JOURNAL ADVOCATE

850 KCA
NEWS RADIO

Colorado PERA provides retirement and other benefits to more than 500,000 current and former teachers, state troopers, corrections officers and other public employees.
– *Denver Business Journal*
October 20, 2014

COLORADO
PERA

Highlights of Media Efforts 2014–2015

National/International



Pensions & Investments



Bloomberg **PLANSPONSOR®**



REUTERS

Financial Investment News **FIN**
Financial Investment News



Education Community Outreach

PERA Provides Long-Term Financial Freedom and Security to our Educators



COLORADO LEAGUE of
CHARTER SCHOOLS
focus on achievement



COLORADO ASSOCIATION OF SCHOOL BOARDS

CASE Colorado Association
of School Executives



- » A+ Denver
- » Colorado Association of School Boards
- » Colorado Association of School Executives
- » Colorado Commission on Higher Education
- » Colorado Department of Education
- » Colorado Education Association
- » Colorado Education Initiative
- » Colorado League of Charter Schools
- » Colorado School and Public Employees Retirement Association
 - Regional affiliates
- » Colorado Succeeds
- » Economic Development Education Committee, Inc.
- » Public Education & Business Coalition

Legal Considerations

- » Exclusive benefit rule
- » Social media policy and exposure
- » Staff use of social media

Current Risks to Public Pensions

- » National pension reform efforts
- » Local pension reform efforts
- » Education reform efforts
- » Ballot initiative processes

Colorado PERA
2014 – 2018 Strategic Plan Initiative Overview
January 2014

Priority 2. Continue to increase awareness of PERA's value to its members and the Colorado economy.

Initiative A. Continue to review and adjust the strategic communications plan accordingly (i.e., targeted audiences and messaging).

Background

In 2012, the Board of Trustees adopted a Strategic Communications Plan. The purpose of the Plan is to enhance stakeholder relations and outreach, fulfilling PERA's fiduciary responsibility to the membership. This initiative does not supersede or eliminate the ongoing member outreach and communication efforts to educate PERA's membership. The Plan is based on explaining the value proposition that Colorado PERA brings to the entire state of Colorado. Within this Plan are six initiatives designed to work in concert to communicate with all of the stakeholders of Colorado PERA. PERA has started the process of implementing these initiatives as part of an overall communications framework. The six initiatives are:

- **Social Media** – This program is designed to develop a community of participants engaged in issues relevant to public employees, their financial security and ultimately their retirement security. This is a comprehensive social media effort that includes a blog, Facebook, Twitter, Google+ and Pinterest pages.
- **Employer Relations Outreach** – This effort places emphasis on developing affiliated employer organization relations in order to foster communications and ultimately employer support.
- **Business Community Outreach** – This effort is designed to educate the broader business community of the value Colorado PERA brings to the State. This includes focusing on the impact PERA's benefit payment stream has throughout the State of Colorado, the sustainability of the plan and how defined benefit plans are the most cost effective method of delivering replacement income in retirement.
- **Ambassador Program Enhancements** – Enhancements to the program include expansion of the total number of ambassadors with a focus on geographic coverage and demographic coverage through age diversification. Enhanced training of the members of the Ambassador program on the overall communications message of PERA will be a focus of the new program.

Colorado PERA
2014 – 2018 Strategic Plan Initiative Overview
January 2014

- **Media Efforts** – Staff will continue to be active in correcting and responding to media outlets that report on PERA issues. Continued development and strengthening of media relations will ensure timely education of those who intend to run a story about PERA or a PERA-related topic.
- **Education Community Outreach** - The goal in a coordinated effort is to reach out to Colorado’s education policy community to engage with the employers of more than half of PERA’s active members, including a subset that is hostile to PERA specifically and defined benefit plans generally.

Conducting a Free Exchange of Ideas While Ensuring Compliance with Fiduciary Law: Retirement Plan Communications in a Brave New World

NAPPA Legal Education Conference
June 26, 2015

Christopher W. Waddell
Senior Attorney
Olson Hagel & Fishburn, Sacramento, CA



What We'll Cover--

- Quick Environmental Scan
- Why Communicate?
- Duty of Loyalty
 - Exclusive Purpose rule
- Duty of Care
 - Evaluate potential extrinsic legal constraints;
 - Communicating “prudently”

Where are we Today?

- Still in recovery mode;
- Systems still face challenges:
 - Economic;
 - Political;
 - Social;
- Operating in what is often a “hostile environment”



- What's a good fiduciary to do?

Why Communicate?

- It's good governance to do so!
 - Develop a common understanding, acceptance and commitment among all stakeholders who are affected by system decisions and circumstances;
 - Improve understanding of and reduce resistance to needed changes and thereby enhance the ability of the system to operate (Funston, Kenneally and Johnson, "Are You Engaged," 2014 (unpublished)).

Duty of Loyalty

- “...A trustee is held to something stricter than the morals of the market place. Not honesty alone, but the punctilio of an honor the most sensitive, is then the standard of behavior. As to this there has developed a tradition that is unbending and inveterate.”
 - Chief Judge (Later Supreme Court Justice) Benjamin Cardozo
 - “Punctilio” = A minute detail of conduct in observance of a code.

Duty of Loyalty – Cont'd

- Fiduciaries must discharge their duties:
 - Solely in the interest of the participants and beneficiaries;
 - For the exclusive purpose of providing benefits to participants and beneficiaries and paying reasonable expenses of administering the system;
 - Impartially, taking into account any differing interests of participants and beneficiaries.
 - Uniform Management of Public Employee Retirement Systems Act § (1997);
Hawley, Johnson and Waitzer, “Reclaiming Fiduciary Duty Balance,” 2011.

Duty of Loyalty – Cont'd

- Duty of Loyalty focuses primarily on purpose and motivation:



Duty of Loyalty and Plan Communications

- If purpose is to enhance system's ability to operate in the current environment:
 - This is in the interests of participants and beneficiaries;
 - Tied to the purpose of providing benefits to participants;
 - A reasonable expense of administering the system (so long as duty of care fulfilled); *therefore:*
 - **Duty of Loyalty =**



Duty of Care

- Act with the care, skill, prudence and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with those matters would use in the conduct of an enterprise of a like character and with like aims.
 - Follow the law
 - Follow a prudent process

Duty of Care– “Follow the Law”

- Even if otherwise compliant with governing laws an plan document, must consider potential “extrinsic” legal constraints.
- Permissible uses of “public” funds:
 - State/local constraints on use of public funds for political purposes;
 - Potential 1st Amendment constraints.

State/Local Constraints on Use of Public Funds for Political Purposes

- What is permitted/prohibited—check applicable statutes and cases in your jurisdiction:
 - Legislative lobbying?
 - Directly? Through an association?
 - Regulations? Prohibited tactics?
 - Grass-roots lobbying?
 - Elections?
 - Candidate versus ballot measure elections?
 - Partisan campaign activity versus “informational” activity?
- Is there a valid appropriation (i.e., budget authority) for the expenditure?

For Illustrative Purposes only, a Look at the Rules in California



- Legislative lobbying permissible *Cal. Gov't Code §50023*;
 - Lots of rules regarding lobbyist registration, prohibited conduct, etc.
- “Grass Roots” lobbying impermissible;
 - *Miller v. Miller* (1978) 87 Cal. App. 3d 762; 42 Ops Cal. Atty. Gen. 25 (1963).
- Partisan campaign activity prohibited;
“informational” activity permissible:
 - *Stanson v. Mott* (1976) 17 Cal. 3d 206; *Vargas v. City of Salinas* (2009) 46 Cal. 4th 1.
 - Often difficult to discern the difference

Partisan Campaign Activity Versus Informational Activity-- California

- Look at style, tenor, timing and audience.
 - Does the communication look like traditional campaign communications (mailers; TV/radio/web ads; billboards; blast e-mails, etc.)?
 - Does the communication sound like campaign materials instead of relevant factual information?
 - Is the communication part of a regular agency form of communication (e.g., monthly newsletter, website)?
 - Is communication being sent right before the election?
 - Is the communication targeted to voters?
- Remember– this is California we're talking about.
 - Your actual mileage may vary depending on the law of your own jurisdiction.

Then There's That Whole First Amendment Thing--

- First Amendment objections to so-called “government campaign speech”
 - Government should refrain from seeking to persuade the public on campaign-related matters because its governmental status means that the listeners’ beliefs will inevitably be coerced;
 - Government’s voice in campaign-related matters threatens to “drown out or unfairly disadvantage dissenting speakers.” Norton, *Campaign Speech Law with a Twist; When the Government is the Speaker, not the Regulator*, 61 Emory L.J. 209 (2011).

The First Amendment and Governmental Campaign Speech– One (California) Court’s View

- “A fundamental precept of this nation’s democratic electoral process is that the government may not “take sides” in election contests or bestow an unfair advantage on one of several competing factions. A principal danger feared by our country’s founders lay in the possibility that the holders of governmental authority would use official power improperly to perpetuate themselves, or their allies, in office; the selective use of public funds in election campaigns, of course, raises the specter of just such an improper distortion of our democratic electoral process.” *Stanson v. Mott* (1976) 17 Cal. 3d 206, 217.

What Constitutes a “Prudent Process” for Retirement System Communications?

- Does the system have a communications policy or established procedures that cover communications with stakeholders and the public?
- Does the policy address issues such as:
 - Purpose of and plan for communications;
 - Responsibility within the system for development of communications and final approval authority;
 - Guidelines for use of social media by system? By trustees and staff? Regular monitoring of system’s online presence?;
 - Requirements for technical and legal review, and scope of such reviews;
- If you don’t have such a policy, you’re not alone. Most systems don’t (yet). Two samples provided in your materials.
- Once you develop a policy, follow it!!

SANTA BARBARA COUNTY EMPLOYEES' RETIREMENT SYSTEM

COMMUNICATIONS POLICY

I. PURPOSE

The purpose of this Communications Policy is to establish guidelines for communications between the System and its members and outside parties. The basic aim of the policy is to ensure that members are well informed of their benefits and rights under the Government Code to mitigate the risk of providing inaccurate, insufficient or inappropriate communications to members and to provide a structure for providing information to parties outside the System.

II. POLICY OBJECTIVES

1. To provide System members with accurate, timely and easy-to-understand information that is pertinent to their needs with respect to Retirement System provisions and benefits;
2. To ensure that Retirement System communications material is up-to-date.
3. That communications with parties outside the System accurately reflect the provisions of the Government Code, Board Bylaws and Policies and the adopted positions of the Board.

III. ASSUMPTIONS AND PRINCIPLES

1. System members need to understand the process for claiming disability retirement and service retirement benefits.
2. System members require accurate and timely communications concerning the pension plan in order to maintain their confidence in the security of the System and to effectively prepare for retirement.
3. System members and their families must have information to make sure that their beneficiaries understand the benefits to be paid upon the member's death.
4. Not all members learn and retain information in the same fashion. Therefore, a variety of approaches and media are required to assure the effectiveness of the member communications program, including:
 - A. Written materials
 - B. Graphic and illustrated material

6. EFFECTIVENESS EVALUATION

Members will be asked to evaluate the clarity and usefulness of the information received at field workshops and counseling sessions. These evaluations will be used by the CEO to improve the quality of those programs.

7. TRUSTEE COMMUNICATIONS WITH EXTERNAL PARTIES

- A. Trustee communications will be consistent with their fiduciary duty to represent the interest of all System members and beneficiaries.
- B. No Trustee will speak for the Board as a whole unless authorized by the Board to do so.
- C. When communicating with external parties, Trustees will disclose when they are not representing a Board policy or position.
- D. The CEO will speak for the Board when needed and the CEO will advise the Board of contacts received from the media.

V. POLICY REVIEW

The Retirement Board shall review this Policy at least every three years to ensure that it remains relevant and appropriate.

VI. AMENDMENT HISTORY

This Policy was adopted by the Retirement Board on October 24, 2001, and revised on April 13, 2005, July 23, 2008 and October 26, 2011; Reviewed April 23, 2014.



Communications Policy

Preamble

As the Administrator of the Municipal Pension Plan (Plan), the Municipal Pension Board of Trustees (Board) shall communicate with Plan Partners, Appointing Authorities, plan members and beneficiaries, plan employers, unions, employer organizations, prospective members and employers, former members and employers (if applicable), the media and others in accordance with the following Policy. This Policy shall also apply to the British Columbia Pension Corporation (Pension Corporation), when acting on behalf of the Board, and to any other agent, service provider, or employee whom the Board retains to assist in its communications activities.

This Policy includes a description of duties and obligations of the Trustees as provided for in governing legislation, the Joint Trust Agreement (JTA), and the general law. This Policy also includes guidelines, procedures and standards designed to assist the Board in performing its duties and fulfilling its obligations. However, this Policy is not intended to derogate from any legal duty or obligation of the Trustees not otherwise referred to herein.

Authorities

This Policy is subject to:

- the applicable provisions of the following Acts and Regulations, as amended from time to time, and to any other Act or Regulations which may be or may become applicable to the Plan:
 - *Income Tax Act & Regulations (ITA)*
 - *Pension Benefits Standards Act & Regulations (PBSA)*
 - *Freedom of Information & Protection of Privacy Act & Regulations (FIPPA)*
 - *Public Sector Pension Plans Act & Regulations (PSPPA)*
- the provisions of the JTA, the Municipal Pension Plan Rules, and the Post-Retirement Group Benefit Rules as amended from time to time.
- the provisions of the Trustee Code of Conduct with respect to confidentiality and should be read in conjunction with the Member & Employer Data and Personal Information Policy (Data Policy).

Section 9 of the PBSA sets out the obligations of the Plan Administrator to file reports and returns with the provincial regulator. In addition, the Plan Administrator

has obligations to report under the ITA. These obligations are addressed in the Data Policy.

Section 10 of the PBSA sets out the obligations of the Plan Administrator to disclose information to plan members, prospective members, former members, survivors and beneficiaries. In addition, the Board supports plan employers, unions and employer organizations by communicating Plan provisions and administrative procedures.

Section 22 of the PBSA sets out the obligations of the Plan Administrator with respect to public access to information. These obligations are addressed in the Data Policy.

Responsibilities

The Board is responsible for the establishment of this Policy, and has sole authority to amend it.

The Board shall:

1. promote awareness of the Plan and its value to plan members and plan employers;
2. ensure that plan members, prospective members, former members, survivors and beneficiaries of members, plan employers, unions, employer organizations, prospective employers and former employers receive complete, accurate and timely communications about plan provisions and administrative procedures and individual communications and statements, as applicable;
3. encourage communication from plan members, prospective members, former members, survivors and beneficiaries of members, plan employers, unions, employer organizations, prospective employers and former employers;
4. communicate to Plan Partners, Appointing Authorities, plan members, plan employers and others about the governance process and board decisions in accordance with this Policy and the Trustee Code of Conduct;
5. respond to external communications, including the media, through the Board Chair or designate; and
6. consult with Plan Partners, Appointing Authorities, employers, and unions about issues coming before the Board.

The Communications Committee shall:

1. review and, as required, recommend to the Board modifications to the provisions of the service agreements with the BC Pension Corporation with respect to communications and the role of the Board in setting procedures for communications;

2. give direction to the Pension Corporation with respect to communications to plan members, prospective members, former members, survivors and beneficiaries of members, plan employers, unions, employer organizations, prospective employers and former employers, in accordance with and subject to the direction of the Board;
3. develop and, as required, recommend to the Board revisions to the Communications Policy.
4. review, revise and recommend to the Board a triennial strategic communications plan and an annual tactical communications plan;
5. identify and establish an inventory of communication products directed to plan members, retirees, plan employers, unions, employer organizations, and others;
6. review, revise and recommend to the Board for approval communications products, product revisions, production and distribution methods and frequency;
7. ensure that the Board receives periodic reports on communications released to plan members, plan employers and others;
8. ensure that the Board receives reports on implementation of other communications initiatives;
9. review, revise and recommend to the Board for approval plan identity protocols and logo;
10. assist with response to media inquiries;
11. arrange and co-ordinate the Annual General Meeting, including the budget, in accordance with and subject to the direction of the Board ; and
12. review, revise, and recommend to the Board the Annual Report and Report to Members.

In addition, the Communications Committee shall develop a framework for communication of the governance process and governance issues to Plan Partners, Appointing Authorities, plan members, plan employers, and others in accordance with the following guidelines:

1. the framework and specific communications initiatives shall be consistent with the Trustee Code of Conduct;
2. the framework and specific communications initiatives shall be in accordance with and subject to the direction of the Board;
3. communications to plan members and plan employers shall be made available to Plan Partners and Appointing Authorities and, provided that they do not contain any confidential information, may also be made available to others;

4. communications shall reflect the decisions of the Board as a whole and shall not include the views expressed by individual Trustees or whether they supported, opposed or abstained from voting on an issue;
5. communications shall generally reflect decisions taken by the Board and, where a decision has been taken and is being reported, may include, as appropriate, options that were not approved and the factors considered in making the decision;
6. the Board may specifically decide to communicate to and consult with Plan Partners, Appointing Authorities, plan members, plan employers, and/or others that an issue is under review and may choose to indicate some options that are being considered.

In instances where the committee is working jointly with another Board committee on the development of a tactical plan and related products, the Communications Committee will consult as required but retains authority for approval or final recommendation to the Board, with the exception of the Plan Advocacy Coordinating Committee, which shall have the authority for approval or final recommendation to the Board of communications materials it initiates.

Individual Trustees:

1. shall govern themselves in accordance with this Policy and the Trustee Code of Conduct.
2. shall refrain from campaigning publicly against the actions of the Board;
3. may receive or seek input from employers, members and other stakeholders, including Plan Partners and Appointing Authorities, on issues under consideration by the Board or Committees; and
4. may discuss and report on matters that have been decided by or are under consideration by the Board provided that the discussion and/or report, whether oral or in writing, is consistent with the direction the Board is taking and is for the purposes of facilitating understanding of the issue.

Trustees should consult the Board Chair if an issue or situation arises about which a Trustee is uncertain how to communicate or respond.

Only the Board Chair, or his or her designate, has authority to release or make statements to the media on behalf of the Board.

The Pension Corporation shall:

1. be responsible for developing communications materials on behalf of the Board in accordance with this Policy and in compliance with all relevant statutes and other authorities;

2. triennially prepare a three-year strategic communications plan identifying communications objective based on the direction of the Communications Committee for review and approval by the Board.
3. annually prepare a tactical communications plan identifying communications objectives for the calendar year based on the three-year strategic communications plan and the direction of the Communications Committee and a supporting budget, if required, for review and approval by the Board;
4. develop and maintain an inventory of communication products directed to plan members, retirees, plan employers, unions, employer organizations, and others;
5. recommend communications strategies, products, product revisions, production and distribution methods and frequency;
6. prepare communication materials for review by the Communications Committee and approval by the Board;
7. develop multi-media informational tools;
8. develop and maintain the Plan website;
9. report quarterly on communications materials released to plan members, plan employers and others about plan provisions and administrative procedures;
10. report on the implementation of the three-year strategic communications plan;
11. develop and maintain plan identity protocols, subject to review by the Communications Committee and approval by the Board;
12. assist with response to media inquiries;
13. assist in the planning and delivery of the Annual General Meeting;
14. monitor media sites;
15. govern themselves according to this Policy and the confidentiality provisions of the Trustee Code of Conduct; and
16. any other communications activities as directed by the Board.

Consultation

Consultation with stakeholders is not a legal requirement prior to the Board making a decision. Given legal requirements, direction from the Plan Partners for the purposes of compliance with regulatory agencies, the Board may not be in a position to undertake any consultation prior to making a decision.

That said, consultation is a useful communications tool that encompasses a variety of approaches that include informing, seeking opinions and input, working directly with, or collaborating on solutions with stakeholders. Methods of consultation may include polling, direct mail to or meetings with plan members, employers, unions, or associations, use of focus groups, call centres, etc.

Generally speaking, the Board or a Committee of the Board may determine for a variety of reasons that some consultation or input will be sought from specific parties. The type and length of consultation will generally depend on the issue and time constraints the Board may have.

Standards

Communications from or on behalf of the Board:

1. will incorporate generally accepted language usage and design standards. Plain language shall be used as a means of communicating effectively to the widest possible audience.
2. will be accurate, timely, and as complete as possible.
3. will make use of a variety of appropriate and available media including hard copy, video, CD, DVD, internet, and social media.
4. may be "pre-tested" through focus groups or other means, as applicable.

Evaluation of communication material content and style, delivery vehicles and perceptions of the effectiveness of the Board's communications initiatives shall be incorporated in communication plans.

Social Media

The Board recognizes the need to significantly utilize social media as part of a comprehensive communications strategy.

The Board recognizes two main social media roles, official and personal:

1. official (on behalf of the Board) - the Trustee is acting as an approved representative of the Plan
2. personal (on behalf of oneself) - the Trustee is acting on their own, not on behalf of the plan or as a professional in their given field.

Pension Corporation Responsibility

The Board may use social media to disseminate information about the Municipal Pension Plan. The Corporation is responsible to manage the social media accounts for this purpose.

Trustee Personal Use of Social Media

The Board acknowledges that some trustees may use social media tools for personal or professional use in their capacity other than as a trustee of the Plan. Trustees will ensure that their

online activity does not conflict with their fiduciary obligations, the Trustee Code of Conduct or this Communication Policy.

Trustees will not affiliate themselves with the Plan on their Facebook and Twitter profiles to avoid being identified as a spokesperson for the Board. Trustees may forward documents through social media that are publically available; however, Trustees may not comment on them except as permitted under the Trustee Code of Conduct and this Communications Policy.

Trustees who use social media tools for personal use will consider how it may affect the Plan and other Board members, recognizing that social media content is pervasive, often permanent and in many cases out of personal control once posted. Trustees will ensure that no material is posted to their personal pages or sites that could jeopardize the reputation of the Trustee, the Plan or the Board.

The Board has the right to request the removal of material posted by a Trustee on any social media site if the material is not supportive of this policy.

Trustees who identify questionable or inappropriate material about the Plan on social media sites will notify the Board.

Social Media Monitoring

The Board will actively monitor social media sites and conversations. It will listen to what is being said about the Plan and issues connected to the Plan. It will analyze what is heard to gain a better understanding of the issues and may officially respond as required.

Social Media Branding

The Plan's online presence will primarily be the intranet and internet websites, and may include social media sites such as Twitter, Facebook, LinkedIn, YouTube, etc■

Appendix A – Social Media Guidelines

The following are guidelines to be kept in mind when engaging in social media:

- Be truthful – lying or omitting the truth betrays trust and loses respect.
- Be transparent – if you are speaking on behalf of the Board disclose who you are and who you are working for.
- Be thoughtful – think carefully before posting; when in doubt, don't post. Take time to understand the culture and rules – explicit and implicit – of the communities with whom you seek to engage.
- Be respectful – do not disclose confidential information or discuss unpublished information about the Plan.
- Be responsible – make sure your professional and personal online activity does not conflict with Board commitments. Do not post anything that could potentially threaten the reputation of the Plan.
- Be personable – use authenticity and your experience by telling relevant, appropriate stories and anecdotes to highlight your ideas and thoughts; this will help people connect to the person behind the title. Be mindful of privacy guidelines and the Trustee Code of Conduct. Sharing too much may lead to compromises of your own or others' privacy.

Appendix B – StraightTalk Website Links Criteria

In order for the StraightTalk website to be relevant as a source of pension information, content must be current and regularly updated to draw in readers. This is achieved by linking to new resources and by generating original content.

The following criteria are to be used when determining the appropriateness of a document.

- Supports the Plan's key messages
- Provides further evidence in support of the Plan's key messages and themes
- Counters criticism of public sector pension plans
- Corrects misinformation about the BC public sector plans
- Espouses similar views and goals as the BC public sector plans (e.g., Aria, NIRSONline)
- Provides information on the pension industry of interest to stakeholders
- Includes information on financial planning for retirement
- Includes demographic information, research and data that provides evidence of the need for pension plans
- Includes case studies of places where conversion of defined benefit plans result in negative outcomes
- Espouses responsible investing
- Provides pension research papers

Process

The Pension Corporation will provide the Executive Director with suggested links for review and approval. The Executive Director, through their delegated authority, will approve links to material using the criteria in this policy.