

Governance Framework



This document provides a sample governance framework to assist small-to medium-sized Capital Accumulation Plan (CAP) sponsors with simpler plans in establishing formal processes for decision-making and plan administration. In accordance with [CAP Guidelines section 2.1.2](#), sponsors are recommended to create and document a governance framework appropriate to their plan's size and complexity.

While not intended as legal advice, this reference aims to illustrate what a basic governance framework could entail for sponsors managing smaller, less complex CAPs outside of pension plans. Sponsors are encouraged to seek professional guidance to ensure their governance approach meets all applicable regulatory requirements.

Sponsor Documentation & Frequency
The wording here is only meant as a sample and should be completed by the Plan Sponsor.

Category	Best Practice	SL Support
Roles and responsibilities	List all roles, responsibilities and accountabilities of any stakeholder or parties involved in the governance framework. Provide information on the location and types of plan documents available, as well as details regarding member obligations and responsibilities.	Please reference your sponsor administration guide and Service and Fee Agreement (SFA). They describe the roles and responsibilities of Sun Life (SL) Group Retirement Services (GRS) as your service provider. Any plan documents produced by SL are provided at implementation for your records, as well as when there are any plan amendments. Plan member responsibilities are outlined in enrolment guides, plan member booklets (if using SL member booklets) and in detail on our secure plan member services website.
Service providers	Periodically review the hired service providers with respect to CAP requirements, performance and quality of products/services, code of conduct, investment managers and performance.	SL GRS has been providing recordkeeping services for many years and as such has tremendous knowledge and depth of experience. SL GRS currently provides services for close to 7,500 group plans with over 1.5 million plan members. SL GRS provides its services in a manner that follows the requirements established in the CAP Guidelines and any applicable legislation. SL GRS maintains an investment fund watchlist. SL offers a wide variety of funds that can address all manner of different market conditions. SL empowers clients with access to comprehensive fund details via Morningstar® , enabling them to make well-informed investment decisions.

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Category	Best Practice	SL Support
Service providers Communication process, including a process for member complaints	Providing members quality education and communication content with a periodic review of plan communications. Identify a process for addressing possible member complaints.	<p>SL's education and communication program aims to engage members at every stage of their career, and every stage of their plan: from welcome to enrolment, savings to pre-retirement and finally to retirement. SL engages members throughout the life of their plan: the blend of digital, print and face-to-face education and communications speaks to the unique aspects of the plan and its members.</p> <p>Sun Life supports CAP sponsors' education strategies through our Sponsor Request Center, an education and communication hub to support employees' financial wellness. Sponsors can find SL's annual calendar of communication campaigns, along with financial wellness webinars (live and recorded) that give members insights on different financial topics.</p>
Code of conduct, including conflict of interest	Reference or put in place a code of conduct, including conflict of interests	<p>SL has a corporate code of conduct that incorporates a conflict-of-interest policy. SL's corporate code of conduct can be viewed here, including our conflict-of-interest policy. In addition to SL's corporate code of conduct, SL GRS has a supplemental code of conduct.</p> <p>SL asks each investment manager with whom we have arrangements as part of our Core Investment Selection™ to provide a code of conduct; compliance manual; soft dollar standards; trading policy; conflict of interest disclosure; proxy voting standards; and privacy standards. Each Investment manager has appropriate policies in place.</p>
Review governance process	Establish and document a review process with a regular frequency.	Use this template along with any additional governance documentation to do your review of the process.

Where appropriate: You may want to consider documenting potential risks and mitigations, according to your plan's size and complexity.

Ex: Knowledge transfer should the current administrator change roles.

Reviewed by:

Function:

Date: