

**BOARD OF TRUSTEES OF THE
EMPLOYEES' RETIREMENT SYSTEM OF THE
CITY OF BALTIMORE**

COMMUNICATIONS POLICY

Adopted November 20, 2014.

The Board of Trustees ("Board") of the Employees' Retirement System of the City of Baltimore ("Retirement System"), in establishing this policy, seeks to establish mechanisms for communicating clearly and openly among trustees, with Retirement System staff and members, with other City agencies, and with external parties. The Board, as a matter of prudent operating policy, hereby adopts the following rules and policies pertaining to Retirement System communications.

1. General Principles.

A. Trustees and Retirement System staff will communicate in the spirit of openness and in a straightforward, constructive manner with due respect and professionalism.

B. In the spirit of openness and transparency, trustees and Retirement System staff will communicate using plain language.

C. At all times, the Board and Retirement System will comply with the Baltimore City Code, the Open Meetings Act (Md. Code, General Provisions Article, Title 3), and the Maryland Public Information Act (Md. Code, State Government Article, Title 10, Subtitle 6, Part III).

D. In all their communications, the trustees have a fiduciary obligation to act solely in the interest of Retirement System members and beneficiaries.

2. Communications Among Trustees.

A. Trustees will communicate with each other in the spirit of open governance and in a straightforward, constructive manner with due respect and professionalism.

B. Trustees will communicate pertinent information to the Board in a timely manner. To assure efficient conduct of Board meetings, trustees will be careful to raise potentially controversial issues before the Board only after prior discussion with the Chair of the Board or relevant committee and the Executive Director/CIO.

C. Any trustee of the Board may request that a matter be added to the Board meeting agenda. If at all possible, such additional matter should be communicated to the Executive Director/CIO as Secretary in advance of the Board meeting.

D. Trustees should be mindful of the possibility of inadvertently forming a meeting within the meaning of the Open Meetings Act by discussing Retirement System or Board business outside the context of a regularly scheduled Board meeting with sufficient trustees to form a quorum.

3. Communications Between Trustees and Retirement System.

A. The Executive Director/CIO, or his or her designee, will serve as the primary contact for communications between any trustee(s) and the Retirement System. The Executive Director/CIO may refer an inquiry to the appropriate Retirement System staff member. Notwithstanding the preceding sentence, any trustee may contact the Executive Director/CIO and/or administrative supervisor staff regarding purely administrative matters.

B. The Executive Director/CIO will communicate pertinent information to the Board in a timely manner, including between Board meetings if necessary; each trustee will likewise communicate pertinent information to the Executive Director/CIO in a timely manner.

C. The Executive Director/CIO will satisfy any requests for information by the Board in a timely manner. Any requests for information that require a significant expenditure of staff time or the use of external resources should be formally requested and considered by the Board.

4. Communications with Members.

A. To enable the consistent treatment of Retirement System members and to prevent a possible conflict of interest, trustees should not provide explicit advice, counsel, or education with respect to the Retirement System to Retirement System members.

B. If a trustee discusses Retirement System business with a member outside of a Board meeting, the Board may act to disqualify the trustee from subsequent formal consideration of the matter by the Board.

C. Trustees should refer any member inquiries to the Executive Director/CIO. The Executive Director/CIO will keep the trustee apprised of the status of the member inquiry.

D. The Executive Director/CIO may refer any member inquiries to the appropriate staff member.

E. Retirement System staff will respond to any member inquiries in a timely and accurate manner.

5. Communication with External Parties.

A. The Executive Director/CIO, or any other person designated by the Board or the Executive Director/CIO, is the sole spokesperson of the Board and

Retirement System. Any media requests should be referred to the Executive Director/CIO or spokesperson. In the absence of the Executive Director/CIO, the Deputy Director, Communications Director, or Chair may serve as spokesperson of the Board and Retirement System.

B. The Executive Director/CIO, or any other person designated by the Board or the Executive Director/CIO, is the sole source for any press releases on the Board or Retirement System. If delegated to another individual, any press release must be approved by the Executive Director/CIO or the Board.

C. In communicating with external parties about the Board or Retirement System, trustees must indicate clearly that they are not acting as a spokesperson for the Board and that the statement does not represent the Board's position. Trustees should notify the Executive Director/CIO when a personal position pertaining to the Board or Retirement System was publicly communicated, including the substance of the statement and the listener.

D. Any materials pertaining to the Retirement System, whether written or oral, intended for public dissemination by any trustee, should be shared with the Executive Director/CIO in advance.

E. The Executive Director/CIO or his or her designee, will respond quickly and accurately to inquiries from any Baltimore City agencies.

F. In order to prevent a possible conflict of interest, trustees should refrain from communicating with any contracted or potential Retirement System service provider about Retirement System business and should direct all inquiries to the Executive Director/CIO or his or her designee. If a trustee discusses Retirement System business with a service provider outside of a Board meeting, the Board may act to disqualify the trustee from subsequent formal consideration of the matter by the Board.