

FINANCIAL STATEMENTS OF THE BANK OF CANADA PENSION PLAN

December 31, 2024

Financial reporting responsibility

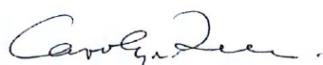
The Bank of Canada (the Bank) is the sponsor and administrator of the Bank of Canada Pension Plan (the Plan) and has established and maintains a trust fund for the Plan. The Bank's Board of Directors has established a Pension Committee and has delegated to it the responsibility for carrying out the Bank's duties as administrator of the Plan.

The accompanying financial statements of the Plan have been prepared by the Bank's management in accordance with Canadian accounting standards for pension plans and contain certain items that reflect estimates and the judgment of management. The integrity and reliability of the data in these financial statements are management's responsibility. Management is also responsible for ensuring that all information in the Plan's Annual Report is consistent with the financial statements.


In support of its responsibility for the integrity and reliability of these financial statements and for the accounting system from which they are derived, management has developed and maintains a system of internal controls to provide reasonable assurance that transactions are properly authorized and recorded, that financial information is reliable, that the assets are safeguarded and liabilities recognized, and that the operations are carried out effectively.

The Pension Committee is responsible for overseeing management of the Plan, and the Bank's Board of Directors has overall responsibility for approving the financial statements. The Pension Committee meets with management and with the external auditor to review the scope of the audit, to review their findings, and to confirm that their responsibilities have been properly discharged. In addition, Mercer (Canada) Limited, a firm of consulting actuaries, conducts a formal actuarial valuation of the Plan annually, as required under the *Pension Benefits Standards Act*.

Deloitte LLP, the Plan's external auditor appointed by the Pension Committee, has conducted an independent audit of the financial statements in accordance with Canadian generally accepted auditing standards, performing such tests and procedures as it considers necessary to express an opinion in its report to the Bank's Board of Directors. The external auditor has full, unrestricted access to the Pension Committee to discuss its audit and related findings as to the integrity of the Plan's financial reporting and the adequacy of internal control systems.



Carolyn Rogers, CPA
Senior Deputy Governor and
Chair, Pension Committee



Coralia Bulhoes, CPA
Chief Financial Officer and Chief Accountant and
Member, Pension Committee

Ottawa, Canada
June 11, 2025

Actuary's opinion

Mercer (Canada) Limited was retained by the Bank of Canada to perform an actuarial valuation of the going-concern assets and pension obligations of the Bank of Canada Pension Plan (the Plan) as of December 31, 2024, for inclusion in the Plan's financial statements.

The objective of the financial statements is to fairly present the financial position of the Plan as of December 31, 2024 on a going-concern basis, in accordance with Section 4600 Pension Plans (Section 4600) of the Chartered Professional Accountants of Canada (CPA Canada) Handbook. The assumptions used to estimate the pension obligations of the Plan are the same as those used for the Plan's funding valuation. While the actuarial assumptions used to estimate the pension obligations for the Plan's financial statements represent the Bank of Canada's best estimate of future events, and while in our opinion these assumptions are reasonable for the purposes of these statements, the Plan's future experience will inevitably differ, perhaps significantly, from the actuarial assumptions. Any differences between the actuarial assumptions and future experience will emerge as gains or losses in future valuations and will affect the financial position of the Plan at that time, as well as the contributions required to fund it.

As part of our valuation, we examined the Plan's recent experience relative to the economic and non-economic assumptions and presented our findings to management. In addition, we provided the Bank of Canada with other relevant information used to develop its long-term assumptions.

Our assessment of the Plan's going-concern assets and pension obligations was based on:

- the results of our January 1, 2025, actuarial valuation of the Plan's going-concern liabilities for funding purposes
- pension fund data provided by the Bank of Canada as of December 31, 2024
- methods prescribed under Section 4600 of the CPA Canada Handbook for pension plan financial statements
- assumptions about future events that have been developed by the Bank of Canada and Mercer (Canada) Limited

We have tested the membership and pension fund data for reasonableness and consistency, and we believe it to be sufficient and reliable for the purposes of the valuation. Our valuation has also been performed in accordance with the requirements of the Canadian Institute of Actuaries. Our opinions have been given and our valuation performed in accordance with accepted actuarial practice.



F. Gendron
Fellow of the Canadian Institute of Actuaries
Fellow of the Society of Actuaries



V. Bérubé
Fellow of the Canadian Institute of Actuaries
Fellow of the Society of Actuaries

Mercer (Canada) Limited

Ottawa, Canada
April 23, 2025

Independent auditor's report

To the Members of the Bank of Canada Board of Directors

Opinion

We have audited the financial statements of the Bank of Canada Pension Plan, which comprise the statement of financial position as at December 31, 2024, and the statements of changes in net assets available for benefits and changes in pension obligations for the year then ended, and notes to the financial statements, including a summary of significant accounting policies (collectively referred to as the "financial statements").

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of the Bank of Canada Pension Plan as at December 31, 2024, and the changes in its net assets available for benefits and changes in its pension obligations for the year then ended in accordance with Canadian accounting standards for pension plans.

Basis for opinion

We conducted our audit in accordance with Canadian generally accepted auditing standards ("Canadian GAAS"). Our responsibilities under those standards are further described in the *Auditor's responsibilities for the audit of the financial statements* section of our report. We are independent of the Bank of Canada Pension Plan in accordance with the ethical requirements that are relevant to our audit of the financial statements in Canada, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Responsibilities of management and those charged with governance for the financial statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with Canadian accounting standards for pension plans, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Bank of Canada Pension Plan's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Bank of Canada Pension Plan or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Bank of Canada Pension Plan's financial reporting process.

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with Canadian GAAS will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with Canadian GAAS, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Bank of Canada Pension Plan's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Bank of Canada Pension Plan's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Bank of Canada Pension Plan to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

Deloitte LLP

Chartered Professional Accountants
Licensed Public Accountants

Ottawa, Canada

June 11, 2025

Statement of financial position

(in thousands of Canadian dollars)

As at December 31	Note	2024	2023
Assets			
Investments	4	2,284,401	2,154,910
Accrued investment income		4,108	1,583
Employer contributions receivable		-	-
		2,288,509	2,156,493
Liabilities			
Investment liabilities	4	6,791	-
Accounts payable and accrued liabilities		3,637	3,996
		10,428	3,996
Net assets available for benefits		2,278,081	2,152,497
Commitments			
Pension obligations	6	1,766,792	1,677,547
Pension plan surplus	6, 9	511,289	474,950

On behalf of the Pension Committee and the Board of Directors of the Bank of Canada



Carolyn Rogers, CPA
Senior Deputy Governor and
Chair, Pension Committee



Coralia Bulhoes, CPA
Chief Financial Officer and Chief Accountant and
Member, Pension Committee



Raymond Ivany
Member, Board of Directors, and
Member, Pension Committee

(See accompanying notes to the financial statements.)

Statement of changes in net assets available for benefits

(in thousands of Canadian dollars)

For the year ended December 31	Note	2024	2023
Investment activities			
Investment income	4	85,070	79,509
Current-year change in fair value of investments	4	105,144	69,322
Net investment activities		190,214	148,831
Member service activities			
Employer contributions			
Current service	9	-	12,213
Special contributions	9	-	456
Employee contributions			
Current service	9	22,245	20,557
Past service		2,034	1,938
Transfers from other plans		3,543	4,632
		27,822	39,796
Benefit payments			
Retirement benefit payments		(61,286)	(57,241)
Termination benefit payments		(6,181)	(2,932)
Disability benefit payments		(174)	(226)
Death benefit payments		(8,105)	(7,609)
		(75,746)	(68,008)
Net member service activities		(47,924)	(28,212)
Administrative expenses	7	(16,706)	(15,364)
Net increase in net assets available for benefits		125,584	105,255
Net assets available for benefits, beginning of year		2,152,497	2,047,242
Net assets available for benefits, end of year		2,278,081	2,152,497

(See accompanying notes to the financial statements.)

Statement of changes in pension obligations

(in thousands of Canadian dollars)

For the year ended December 31	2024	2023
Increase in pension obligations		
Benefits earned	61,599	57,764
Interest cost	91,876	85,900
Experience loss	11,516	29,713
Loss on change of assumptions	-	5,244
	164,991	178,621
Decrease in pension obligations		
Retirement benefit payments	61,286	57,241
Termination benefit payments	6,181	2,932
Disability benefit payments	174	226
Death benefit payments	8,105	7,609
	75,746	68,008
Net increase in pension obligations	89,245	110,613
Pension obligations, beginning of year	1,677,547	1,566,934
Pension obligations, end of year	1,766,792	1,677,547

(See accompanying notes to the financial statements.)

Notes to the financial statements

For the year ended December 31, 2024

1. Description of the Bank of Canada Pension Plan

The following description of the Bank of Canada Pension Plan (the Plan) is a summary only. For more complete information, refer to the text of the Plan (Bank By-law 15), available on the website of the Bank of Canada (the Bank).

General

The Plan was established under the provisions of the *Bank of Canada Act* (the Act) and has remained in accordance with the Act as subsequently amended. Responsibility for administration and investment of the Plan resides with the Pension Committee and includes adherence to the guidelines established in the Statement of Investment Policies and Procedures (SIPP) that is approved annually by the Bank's Board of Directors (the Board).

The Plan is a contributory defined-benefit pension plan covering substantially all employees of the Bank. The Plan provides for retirement pensions, survivors' pensions, and refunds occasioned by termination of employment or death. The Plan's registration number with the Office of the Superintendent of Financial Institutions (OSFI) is 55116.

The Plan is a registered plan as defined in the *Income Tax Act* (the ITA) and, consequently, is not subject to income taxes. The Plan's registration number for income tax purposes is 0349233.

The Plan is the sole shareholder of 9439897 Canada Inc., 12747553 Canada Inc., and 12747570 Canada Inc., corporations registered under the *Canada Business Corporations Act*, whose purpose is to facilitate foreign investment.

In 1992, the Bank of Canada Supplementary Pension Arrangement (the SPA) was introduced to supplement the pensions of those employees who contribute toward pension benefits that are above the maximum prescribed for registered pension plans under the ITA. A separate trust fund has been established to support the SPA and, therefore, the net assets available for benefits and the pension obligations pertaining to the SPA are reported separately and not included in these financial statements and related note disclosures.

The address of the Plan sponsor's registered office is 234 Wellington Street, Ottawa, Ontario.

Benefits

A lifetime retirement pension is available to Plan members based on the number of years of credited service, the average salary of the five highest-paid continuous years of service and the member's age at retirement.

Death benefits are available on the death of an active member or of a retired member. The benefits may take the form of a transfer to the survivor's locked-in retirement vehicle, a survivor pension or a refund of the contributions plus interest.

Upon termination of employment, a Plan member has the option of taking a deferred pension for service rendered or of transferring the commuted value of the pension benefit to a locked-in retirement vehicle.

Pension benefits are indexed annually on January 1 to reflect the changes in the consumer price index.

Funding

Required contributions to the Plan are determined annually by actuarial valuations that are performed in accordance with legislative requirements and with the recommendations of the Canadian Institute of Actuaries (CIA) for the valuation of pension plans.

Plan members are required to contribute a percentage of their pensionable salary to the Plan each year, to a maximum of 35 years of credited service. The contribution rates are as follows:

Contribution rates by members	Salary below the YMPE*	Salary above the YMPE*
Pre-January 1, 2012 plan design	8.7%	11.5%
Post-January 1, 2012 plan design	8.0%	10.5%

* The year's maximum pensionable earnings (YMPE) were \$69 thousand in 2024 and \$67 thousand in 2023.

In accordance with maximums prescribed by the ITA, a member accrues benefits from the plan on a salary up to \$198 thousand in 2024 (\$192 thousand in 2023). Contributions on earnings above this maximum are made to the SPA.

2. Basis of preparation

The financial statements of the Plan are prepared in accordance with Canadian accounting standards for pension plans and present the financial position of the Plan, on a going-concern basis, as a separate financial reporting entity, independent of the sponsor and of Plan members. The financial statements are prepared in order to assist Plan members and others in reviewing the activities of the Plan for the fiscal period, but they do not portray the funding requirements of the Plan or the benefit security of individual Plan members.

These financial statements are prepared in accordance with Section 4600 *Pension Plans* (Section 4600) of the *Chartered Professional Accountants of Canada Handbook* (the Handbook). International Financial Reporting Standards, as set out in Part I of the Handbook, have been chosen for accounting policies that do not relate to the Plan's investment portfolio or pension obligations, to the extent that those standards do not conflict with the requirements of Section 4600.

The Bank's Board of Directors approved the financial statements on June 11, 2025.

Significant accounting judgments, estimates and assumptions

The preparation of financial statements requires management to make judgments, estimates and assumptions in the application of accounting policies and the reported amounts of assets, liabilities, income and expenses, and other related information.

Management based its assumptions and estimates on the information available when these financial statements were prepared. Existing circumstances and assumptions about future developments may change in response to market fluctuations or circumstances that are beyond the control of management, in which case the impact will be recognized in the financial statements of a future reporting period.

Judgments, estimates and underlying assumptions are reviewed for appropriateness and consistent application on an ongoing basis. Revisions to accounting estimates are recognized in the reporting period in which the estimates are revised and in any future reporting periods affected.

Significant judgment, estimates and assumptions are used primarily in the valuation of real estate and infrastructure funds (Note 4), and in the calculation of the pension obligations (Note 6).

Functional and presentation currency

The Plan's functional and presentation currency is the Canadian dollar. The amounts in the notes to the financial statements of the Plan are in thousands of Canadian dollars, unless otherwise stated.

3. Significant accounting policies

Investments

Investments are recorded at fair value on the trade date and are stated at fair value at the reporting date. Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. Transaction costs are expensed as incurred.

Accrual of income

Interest income, dividends, and other income are recognized on an accrual basis, net of any applicable withholding taxes.

Current-year change in the fair value of investments

The current-year change in the fair value of investments is the difference between the fair value and the cost of investments at the beginning and end of each year, adjusted for any realized gains and losses during the year.

Foreign currency translation and foreign exchange forward contracts

Monetary assets and liabilities denominated in foreign currencies are translated into Canadian dollars at the exchange rates prevailing at the reporting date. Foreign exchange forward contracts are measured at fair value as at the reporting date. Gains and losses from translation and foreign exchange forward contracts are included in the current-year change in the fair value of investments. Income and expenses are translated at the rate of exchange prevailing at the time of the transactions.

Pension obligations

Pension obligations are based on an actuarial valuation for funding purposes, which represents the best estimate assumptions, that is prepared on an annual basis by a firm of independent actuaries, as discussed in Note 6.

Contributions

Employer contributions for current service and special payments to fund any Plan deficits must meet the minimum contributions required based on the most recent actuarial funding valuation report (Note 9).

Employee contributions for current service are recorded in the year in which the related payroll costs are incurred. Contributions for past service are recorded in the year received.

Changes in accounting policies

There was no new or amended standard adopted by the Plan during 2024 that had a material impact on its financial statements.

Future changes in accounting standards

There are no anticipated new or amended standards that are expected to have a significant impact on the Plan's financial statements.

4. Financial instruments

Investments

The SIPP complies with the regulations of the *Pension Benefits Standards Act* (PBSA). The SIPP is updated by the Pension Committee and approved annually by the Board. Compliance with the SIPP is evaluated through ongoing review of investment valuations by management.

The Plan invests in cash and cash equivalents, fixed-income securities, equity funds, inflation-linked assets, infrastructure funds and real estate funds in accordance with its SIPP.

To comply with the SIPP, the asset mix must be maintained by asset type within the following ranges:

Asset type	% of portfolio market value	
	Minimum	Maximum
Total return-seeking assets, of which:	51	71
Canadian equities	-	20
Foreign equities	6	26
Real estate	10	30
Infrastructure equity	5	25
Total liability-matching assets, of which:	29	49
Nominal bonds and mortgages	18	38
Price-index-linked assets	-	20
Cash and cash equivalents	-	10

The following table shows the fair value and the cost of investments at the reporting date, as well as the current-year change in the fair value of investments and related income. Investment income includes interest, dividends, distributions from pooled funds, income from infrastructure funds, income from real estate funds and forward contracts.

As at December 31, 2024	Fair value	Cost	Investment income	Current year change in fair value of investments*	Total return
Cash and cash equivalents					
Cash	5,375	5,375	-	-	-
Short-term investments	16,820	16,726	906	80	986
	22,195	22,101	906	80	986
Fixed-income securities					
Bonds	36,484	36,676	90	(195)	(105)
Fixed-income funds	600,379	696,556	20,070	(8,540)	11,530
	636,863	733,232	20,160	(8,735)	11,425
Equity funds					
Canadian equity	236,265	223,832	21,700	23,920	45,620
Foreign equity	387,957	284,209	9,356	80,920	90,276
	624,222	508,041	31,056	104,840	135,896
Inflation-linked assets					
Canadian marketable bonds	220,893	216,710	3,308	4,052	7,360
Corporate bonds	2,639	976	160	(3)	157
	223,532	217,686	3,468	4,049	7,517
Infrastructure funds	372,962	310,702	12,198	31,632	43,830
Real estate funds					
Canadian real estate	93,871	85,204	3,393	(2,753)	640
Foreign real estate	310,661	309,419	13,889	5,653	19,542
	404,532	394,623	17,282	2,900	20,182
Forward contract assets	95	-	-	(207)	(207)
Total investment assets	2,284,401	2,186,385	85,070	134,559	219,629
Forward contract liabilities	(6,791)	-	-	(29,415)	(29,415)
Net investment activity	2,277,610	2,186,385	85,070	105,144	190,214

* The 2024 change in the fair value of investments includes \$0.9 million of realized gains but does not include the \$5.3 million of expenses paid from the net assets of the investments.

As at December 31, 2023	Fair value	Cost	Investment income	Current year change in fair value of investments*	Total return
Cash and cash equivalents					
Cash	6,665	6,665	-	-	-
Short-term investments	19,813	19,684	951	(119)	832
	26,478	26,349	951	(119)	832
Fixed-income securities					
Bonds	9,004	8,892	80	3,427	3,507
Fixed-income funds	633,628	730,347	20,816	43,317	64,133
	642,632	739,239	20,896	46,744	67,640
Equity funds					
Canadian equity	191,012	202,146	17,413	2,649	20,062
Foreign equity	310,643	281,512	6,844	44,563	51,407
	501,655	483,658	24,257	47,212	71,469
Inflation-linked assets					
Canadian marketable bonds	216,841	212,066	3,394	(705)	2,689
Corporate bonds	2,698	1,017	155	126	281
	219,539	213,083	3,549	(579)	2,970
Infrastructure funds	344,165	302,854	9,592	16,318	25,910
Real estate funds					
Canadian real estate	98,003	85,204	3,629	(7,183)	(3,554)
Foreign real estate	308,681	312,182	16,635	(41,404)	(24,769)
	406,684	397,386	20,264	(48,587)	(28,323)
Forward contract assets	13,757	-	-	8,333	8,333
Total investment assets	2,154,910	2,162,569	79,509	69,322	148,831
Forward contract liabilities	-	-	-	-	-
Net investment activity	2,154,910	2,162,569	79,509	69,322	148,831

* The 2023 change in the fair value of investments includes \$57.3 million of realized gains.

Financial instruments measurement

The carrying values of accrued investment income and accounts payable and accrued liabilities approximate their fair values due to their short-term nature and include no past due or impaired amounts.

Following are descriptions of the methodologies used by management to determine the fair-value measurements of investments held by the Plan.

Cash and cash equivalents consist of cash and treasury bills, which are valued using published market quotations.

Fixed-income securities consist of directly owned bonds and investments in bond funds. Directly owned bonds are valued using pricing information compiled by a third-party supplier. Valuations of the bond funds are received on a per unit basis from the asset manager. Valuations are derived from the sum of the fair value of bond fund assets less bond fund liabilities divided by the total number of units outstanding.

Equity funds consist of Canadian and foreign holdings. Investment valuations for the funds are received from the various issuers and are calculated in accordance with their published valuation methodologies. Valuations are derived from the sum of the fair value of equity fund assets determined using published market quotations less equity fund liabilities divided by the total number of units outstanding.

Inflation-linked assets consist mainly of Government of Canada bonds and corporate bonds. They are valued using pricing information compiled by a third-party supplier that is derived from published market quotations.

Infrastructure funds consist mainly of diversified pooled funds of long-term contracted or regulated infrastructure assets across Canada, the United States, Europe, Asia Pacific and Latin America. They are valued at an estimated fair value and are subject to valuations by independent valuers on at least an annual basis. Valuations mostly use a discounted cash flow approach.

Real estate funds consist mainly of diversified pooled funds of commercial, industrial and office real estate in several major centres across Canada, the United States and Europe. They are valued at an estimated fair value and are subject to real estate appraisals by independent and accredited appraisers on at least an annual basis. Valuations use one or more of three commonly used methodologies to arrive at an indication of value: the replacement-cost approach, the income approach and the direct-comparison approach.

Forward Contracts consist of foreign exchange contracts entered into by the Plan to manage foreign currency exposure on foreign equity, infrastructure funds and real estate funds. The fair value of the forward contracts is determined using prevailing exchange rates as at period end.

Fair value hierarchy of financial instruments

Financial instruments are classified using a fair value hierarchy that reflects the significance of the inputs used in making the measurements:

- **Level 1:** Unadjusted quoted prices in active markets for identical assets or liabilities, which represent actual and regularly occurring arm's-length market transactions
- **Level 2:** Inputs other than quoted prices included in Level 1, which are observable for the assets or liabilities either directly (e.g., prices for similar instruments, prices from inactive markets) or indirectly (e.g., interest rates, credit spreads)
- **Level 3:** Unobservable inputs for the assets or liabilities that are not based on observable market data as a result of inactive markets (e.g., market participant assumptions)

The fair value hierarchy requires the use of observable market inputs wherever such inputs exist. A financial instrument is classified at the lowest level of the hierarchy for which a significant input has been considered in measuring fair value.

The following table shows the fair value of the Plan's financial assets and liabilities, classified in accordance with the fair value hierarchy described above.

As at December 31, 2024	Level 1	Level 2	Level 3	Total
Cash and cash equivalents	22,195	-	-	22,195
Fixed income securities				
Bonds	-	36,484	-	36,484
Fixed-income funds	-	600,379	-	600,379
Equity funds				
Canadian equity	-	236,265	-	236,265
Foreign equity	-	387,957	-	387,957
Inflation-linked assets				
Canadian marketable bonds	-	220,893	-	220,893
Corporate bonds	-	2,639	-	2,639
Infrastructure funds	-	-	372,962	372,962
Real estate funds				
Canadian real estate	-	-	93,871	93,871
Foreign real estate	-	-	310,661	310,661
Forward Contracts				
Forward contract assets	-	95	-	95
Forward contract liabilities	-	(6,791)	-	(6,791)
Total	22,195	1,477,921	777,494	2,277,610

As at December 31, 2023	Level 1	Level 2	Level 3	Total
Cash and cash equivalents	26,478	-	-	26,478
Fixed income securities				
Bonds	-	9,004	-	9,004
Fixed-income funds	-	633,628	-	633,628
Equity funds				
Canadian equity	-	191,012	-	191,012
Foreign equity	-	310,643	-	310,643
Inflation-linked assets				
Canadian marketable bonds	-	216,841	-	216,841
Corporate bonds	-	2,698	-	2,698
Infrastructure funds	-	-	344,165	344,165
Real estate funds				
Canadian real estate	-	-	98,003	98,003
Foreign real estate	-	-	308,681	308,681
Forward Contracts				
Forward contract assets	-	13,757	-	13,757
Forward contract liabilities	-	-	-	-
Total	26,478	1,377,583	750,849	2,154,910

For assets and liabilities measured at fair value in the financial statements, the Plan determines whether transfers have occurred between levels in the hierarchy by reassessing categorization at the end of each reporting period. Transfers are dependent on internal classification criteria that are based on variables such as observability of prices. Transfers between levels are deemed to occur at the beginning of the year in which the transfer occurs. There were no transfers of amounts between levels in 2024 (nil in 2023).

The following table reconciles the fair value of the infrastructure and real estate funds determined using Level 3 fair - value measurements:

As at December 31, 2024	Infrastructure	Real estate	Total
Fair value at beginning of year	344,165	406,684	750,849
Increase in unrealized gains included in net assets*	22,562	2,229	24,791
Purchases	-	35,718	35,718
Capitalized income	-	3,466	3,466
Sales**	9,070	191	9,261
Decrease in cumulative incentive fees owing	-	2,069	2,069
Settlement of fees	(2,818)	(3,687)	(6,505)
Return of capital	(17)	(42,138)	(42,155)
Fair value at the end of the year	372,962	404,532	777,494

* The fair value gains are presented in *Current-year change in fair value of investments* in the statement of changes in net assets available for benefits.

** Sales are presented net of realized gains of \$9.7 million.

As at December 31, 2023	Infrastructure	Real estate	Total
Fair value at beginning of year	326,059	459,675	785,734
Increase (decrease) in unrealized gains included in net assets*	16,318	(53,039)	(36,721)
Purchases	1,623	26,496	28,119
Capitalized income	3,555	4,298	7,853
Sales**	-	(17,393)	(17,393)
(Increase) decrease in cumulative incentive fees owing	(106)	916	810
Settlement of fees	(1,533)	(446)	(1,979)
Return of capital	(1,751)	(13,823)	(15,574)
Fair value at the end of the year	344,165	406,684	750,849

* The fair value gains are presented in *Current-year change in fair value of investments* in the statement of changes in net assets available for benefits.

** Sales are presented net of realized gains of \$4.5 million.

Securities lending

The Plan lends securities as a means of generating incremental income and of supporting the normal practice in line with investment strategies. Securities are loaned only against collateral representing at least 102% of the value of the securities. At December 31, 2024, the Plan's investments included no loaned securities (loaned securities had a fair value of \$124.3 million as at December 31, 2023). No collateral was held in respect of loans (the fair value of collateral received in respect of these loans was \$138.1 million as at December 31, 2023, representing 111.1% of the market value of the loaned securities).

Foreign exchange forward contracts

The notional and fair values of foreign exchange forward contracts included in *Foreign equity funds*, *Infrastructure* and *Foreign real estate funds* are summarized in the following table:

As at December 31	2024		2023	
	Notional value	Fair value	Notional value	Fair value
Contracts related to <i>Foreign equity funds</i>				
Euros	14,597	95	13,019	80
Contracts related to <i>Infrastructure funds</i>				
US Dollars	43,097	(643)	159,794	4,937
Contracts related to <i>Foreign real estate funds</i>				
US Dollars	217,925	(5,115)	214,773	6,230
Euros	96,720	(1,033)	103,652	2,510
	314,645	(6,148)	318,425	8,740
Forward contract assets and liabilities	372,339	(6,696)	491,238	13,757

Notional values refer to the face amount of the forward contract to which an exchange rate is applied. The notional value does not represent the total gain or loss to which the Plan will be a party but is the basis upon which the fair value is determined. Accordingly, the notional values are not recorded as assets or liabilities in the financial statements.

The foreign exchange forward contracts are all set to mature within 27 days of December 31, 2024 (within 29 days of December 31, 2023).

The Plan's investments, securities-lending activities and foreign exchange forward contracts are subject to various risks that can affect their fair value, recoverable amount or future cash flows. These risks are discussed in Note 5.

5. Financial risk management

The Plan's financial instruments consist of its investments, accrued investment income, forward contracts, and accounts payable and accrued liabilities. The Plan's investments are subject to credit, liquidity and market risks.

Requirements for asset diversification and investment eligibility serve as basic risk-management tools for the investment portfolio. The Plan's SIPP requires that its investments be held in a diversified mix of asset types and sets out investment eligibility requirements. The diversification of assets serves to decrease the variations in the expected return performance of the portfolio. Eligibility requirements serve to ensure that Plan assets, to the extent possible, are not placed at undue levels of risk and can meet the obligations of the Plan as necessary.

While the above policies aid in risk management, the Plan's investments and performance remain subject to risks, the extent of which is discussed below.

Credit risk

Credit risk is the risk that a counterparty to a financial contract will fail to discharge its obligations in accordance with agreed-upon terms.

The Plan is exposed to credit risk through its investments in short-term investments, fixed-income securities and inflation-linked assets, as well as its foreign currency hedging activities and securities-lending transactions.

The Plan's credit risk on short-term investments, fixed-income securities and inflation-linked assets is managed by setting concentration limits on the exposure to any single issuer, as well as by setting minimum credit-rating criteria for investment. The maximum exposure to any one issuer cannot exceed 10% of the total fair value of bond holdings, other than securities issued by the federal or provincial governments. The minimum credit rating for any single security is

based on a composite rating from three rating agencies. The minimum rating at the time of purchase must be the equivalent of BBB (low) as determined by the Dominion Bond Rating Service.

Credit risk arising from foreign currency hedging activities and securities-lending transactions is managed by entering into contracts with creditworthy counterparties subject to minimum credit-rating requirements and by setting limits on the allowable amount of exposure to each of these counterparties.

In addition to being fully collateralized with high-quality securities, securities-lending transactions take place under strict adherence to OSFI guidelines and are indemnified through a custodial agreement in the event of default. Securities are loaned only against collateral representing at least 102% of the value of the securities. As a result of the collateral on hand, the net credit exposure is considered insignificant.

The maximum exposure to credit risk in short-term investments, fixed-income securities and inflation-linked assets is estimated to be the fair value of those instruments.

Concentrations of credit risk

Concentrations of credit risk occur when a significant proportion of the portfolio is invested in securities subject to credit risk with similar characteristics or subject to similar economic, political or other conditions. The investment portfolio as a whole is subject to maximum exposure limits and asset-allocation targets that are designed to manage exposure to concentrated credit risk.

The investment portfolio contains concentrated credit risk in money market instruments, fixed-income securities and inflation-linked assets, as follows:

As at December 31, 2024	Short-term instruments		Fixed-income securities		Inflation-linked assets	
	\$	%	\$	%	\$	%
Securities issued or guaranteed by:						
Government of Canada	16,820	100.0	13,172	2.1	188,968	84.5
Canadian provinces or municipalities	-	-	350,626	55.0	31,925	14.3
Corporations	-	-	264,057	41.5	2,639	1.2
Cash	-	-	9,008	1.4	-	-
	16,820	100.0	636,863	100.0	223,532	100.0
Credit rating						
AAA to AA	16,820	100.0	342,199	53.8	220,893	98.8
A	-	-	86,120	13.5	2,639	1.2
BBB	-	-	44,762	7.0	-	-
Not rated**	-	-	163,782	25.7	-	-
	16,820	100.0	636,863	100.0	223,532	100.0

As at December 31, 2023	Short-term instruments		Fixed-income securities		Inflation-linked assets	
	\$	%	\$	%	\$	%
Securities issued or guaranteed by:						
Government of Canada	19,813	100.0	14,702	2.3	186,154	84.8
Canadian provinces or municipalities	-	-	354,099	55.1	30,687	14.0
Corporations	-	-	265,754	41.3	2,698	1.2
Cash	-	-	12,752	2.0	-	-
Investment liabilities*	-	-	(4,675)	(0.7)	-	-
	19,813	100.0	642,632	100.0	219,539	100.0
Credit rating						
AAA to AA	19,813	100.0	210,608	32.8	186,154	84.8
A	-	-	223,197	34.7	33,385	15.2
BBB	-	-	48,134	7.5	-	-
Not rated**	-	-	160,693	25.0	-	-
	19,813	100.0	642,632	100.0	219,539	100.0

* Investment liabilities include capital gains payable, income payable and other payables by the fund.

** Fixed-income securities includes private placements that are considered equivalent to investment grade as per the asset manager's credit assessment but are not directly rated by a credit-rating agency.

Liquidity risk

Liquidity risk is the risk that the Plan will encounter difficulty in meeting obligations associated with financial liabilities that are settled by delivering cash or another financial asset.

The Plan's financial liabilities consist of forward contract and accounts payable and accrued liabilities. These amounts are short term in duration and are set to mature within one year.

Liquidity risk is managed by ensuring that sufficient liquid assets are maintained to meet anticipated payments and investment commitments in general. With respect to the Plan's financial liabilities and the actuarial value of pension obligations, management believes that the Plan is not subject to any significant liquidity risk.

The actuarial value of pension obligations is not considered a financial liability; however, it is the most significant liability of the Plan in the statement of financial position. The Bank, as Plan sponsor, is required to contribute all funds necessary to meet any funding shortfalls of the Plan as they may arise from time to time.

Market risk

Market risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market prices. Market risk comprises three types of risk: interest rate risk, currency risk and other price risk.

Interest rate risk

Interest rate risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates. The Plan is exposed to interest rate risk through its investment holdings in interest-bearing or fixed-income assets. These principally include short-term investments and fixed-income securities.

The Plan manages its exposure to interest rate risk by holding a diversified mix of assets, both interest-bearing and non-interest-bearing. This approach decreases the impact of variations in overall portfolio performance owing to factors arising from interest rate risk.

Investments subject to interest rate risk bear fixed rates of interest. Therefore, short-term fluctuations in prevailing interest rates would not normally subject the Plan to fluctuating cash flows. In the event of a sale or redemption prior to maturity, proceeds would be affected by the impact of prevailing interest rates on the fair value of the investment.

The fair value of the Plan's assets, specifically the fair value of fixed-income securities (excluding inflation-linked assets), is affected by changes in the nominal interest rate. A 25-basis-point increase/decrease in the nominal interest rate would have had the following impact on the fair value of implicated investments and the related change in fair value:

As at December 31	2024		2023	
	Increase	Decrease	Increase	Decrease
Short-term investments	(7)	6	(12)	7
Fixed-income securities	(24,915)	24,915	(24,633)	24,633
Total	(24,922)	24,921	(24,645)	24,640

The actuarial value of pension obligations is not considered to be a financial instrument; however, these obligations are sensitive to changes in long-term interest rates. The Plan is exposed to interest rate risk because of mismatches between the impact of interest rates on the actuarial value of pension obligations and their corresponding impact on the investment portfolio as a whole. Given the nature of pension benefits, such risks cannot be eliminated but are addressed through the funding of the Plan and through regular review of the characteristics of the Plan's investment portfolio relative to the pension obligations liability.

A 10-basis-point increase/decrease in the interest rate assumption would have had the following impact on the value of pension obligations:

As at December 31	2024		2023	
	Increase	Decrease	Increase	Decrease
Pension obligations	(26,393)	26,608	(24,948)	25,573

Currency risk

Currency risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in foreign exchange rates.

The Plan is exposed to currency risk arising from its holdings of investments denominated in foreign currencies, as well as investments that, although not denominated in foreign currencies, have underlying foreign currency exposure. This exposure lies principally within foreign equity, infrastructure and foreign real estate funds.

The Plan manages these risks through its SIPP, which limits the proportion of foreign assets within the portfolio, and through off-balance-sheet commitments in the form of foreign exchange forward contracts for the sale of various currencies (Note 4). The purpose of these contracts is to partially preserve the fair value of Plan assets by offsetting the impact of increases in the Canadian dollar relative to the underlying foreign currency exposure. In the case of a decrease in the Canadian dollar relative to the underlying foreign currency exposure, the foreign exchange forward contracts in place decrease in value, while the relative value of the foreign currency funds increases.

The Plan's net foreign currency exposure in Canadian dollars, after giving effect to the notional value of foreign exchange forward contracts described in Note 4, is presented in the following table:

As at December 31	2024	2023*
Net foreign currency exposure		
US dollars	230,203	164,114
Pounds sterling	35,369	37,356
Japanese yen	23,175	21,592
Hong Kong dollars	11,255	8,066
Swiss francs	8,163	8,253
Taiwanese dollars	8,123	5,303
Indian rupees	7,483	3,002
Australian dollars	6,640	6,989
Euros	6,356	1,986
Swedish krona	5,264	3,983
Danish krone	5,251	5,654
Korean won	3,935	4,444
Norwegian krone	1,928	2,924
Mexican peso	462	787
Other currencies	12,768	12,546
Total exposure	366,375	286,999

* Certain comparative figures have been adjusted to conform with the current year's approach for reflecting the impact of foreign currency hedging within certain investment funds.

The fair value of Plan assets, specifically those denominated in foreign currencies, is affected by changes in foreign exchange rates.

The most significant concentrations of net foreign currency exposures are in US dollars, pounds sterling, Japanese yen, Hong Kong dollars and Swiss francs. A 1% increase (decrease) in the foreign exchange rate of a significant foreign currency in which investments are denominated relative to the Canadian dollar would have the following impact on the fair value of investments net of foreign currency hedges:

As at December 31	2024		2023*	
	Increase	Decrease	Increase	Decrease
US dollars	2,302	(2,302)	1,641	(1,641)
Pounds sterling	354	(354)	374	(374)
Japanese yen	232	(232)	216	(216)
Hong Kong dollars	113	(113)	81	(81)
Swiss francs	82	(82)	83	(83)
Total	3,083	(3,083)	2,395	(2,395)

* Certain comparative figures have been adjusted to conform with the current year's approach for reflecting the impact of foreign currency hedging within certain investment funds.

This calculation is based on the Plan's direct foreign currency holdings and does not contemplate the effect of any secondary impacts from changes in exchange rates.

Future cash flows relating to the sale or maturity of a financial instrument will vary, depending on the prevailing exchange rate at the time of the transaction.

Other price risk

Other price risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market prices (other than those arising from interest rate or currency risk), whether those changes are caused by factors specific to the individual financial instrument or its issuer or by factors affecting all similar financial instruments traded in the market.

The Plan is exposed to other price risk through its equity, infrastructure, real estate and forward contract holdings.

The Plan manages these risks through fair diversification, setting maximum allowable proportions of equities in its investment portfolio, and through concentration limits on investments in any one issuer, as outlined in its SIPP. The maximum exposure to any single security cannot exceed 10% of the total fair value of equity holdings, unless such a security is an investment in a pooled or index fund. The maximum exposure to a pooled or index fund can exceed 10% so long as no single security within it exceeds 10% of the market value of that fund.

The primary objective of the infrastructure and real estate funds is to provide diversification to the equity allocation while providing a level of return that, in the context of the entire portfolio, is expected to meet the long-term return objectives of the Fund.

A 1% increase (decrease) in the underlying market prices in the equity, infrastructure, real estate and forward contracts positions would have the following impact on the fair value of investments and the net increase in assets:

As at December 31	2024		2023	
	Increase	Decrease	Increase	Decrease
Equity funds				
Canadian equity	2,363	(2,363)	1,910	(1,910)
Foreign equity	3,880	(3,880)	3,106	(3,106)
	6,243	(6,243)	5,016	(5,016)
Infrastructure funds	3,730	(3,730)	3,442	(3,442)
Real estate funds				
Canadian real estate	939	(939)	980	(980)
Foreign real estate	3,107	(3,107)	3,087	(3,087)
	4,046	(4,046)	4,067	(4,067)
Forward contracts				
Forward contract assets	1	(1)	138	(138)
Forward contract liabilities	(68)	68	-	-
	(67)	67	138	(138)
Total	13,952	(13,952)	12,663	(12,663)

Future cash flows relating to the sale of an investment exposed to other price risk will vary, depending on market prices at the time of sale.

Concentration of other price risk

Concentration of other price risk occurs when a significant portion of the portfolio is invested in equities with similar characteristics or is subject to similar economic, market, political or other conditions.

The following table provides information on the industries in which the equity funds are invested, expressed as a percentage of total holdings:

As at December 31, 2024	Canadian equities		Foreign securities	
	\$	%	\$	%
Consumer discretionary	5,004	2.1	47,005	12.1
Consumer staples	4,181	1.8	20,946	5.4
Energy	35,477	15.0	11,377	2.9
Financial	62,746	26.6	69,831	18.0
Health care	3,738	1.6	45,300	11.7
Industrials	45,042	19.1	35,786	9.2
Information technology	24,843	10.5	96,741	24.9
Materials	35,616	15.1	8,768	2.3
Real estate	5,162	2.2	6,424	1.7
Telecommunication services	1,475	0.5	39,859	10.3
Utilities	11,384	4.8	5,515	1.4
Other	1,597	0.7	405	0.1
Total	236,265	100.0	387,957	100.0

As at December 31, 2023	Canadian equities		Foreign securities	
	\$	%	\$	%
Consumer discretionary	4,775	2.5	41,059	13.2
Consumer staples	4,584	2.4	20,313	6.5
Energy	36,483	19.1	12,844	4.1
Financial	60,551	31.7	48,977	15.8
Health care	191	0.1	38,825	12.5
Industrials	28,270	14.8	30,900	9.9
Information technology	21,584	11.3	71,645	23.1
Materials	17,382	9.1	10,472	3.4
Real estate	3,820	2.0	1,559	0.5
Telecommunication services	4,966	2.6	24,888	8.0
Utilities	7,258	3.8	5,426	1.8
Other	1,148	0.6	3,735	1.2
Total	191,012	100.0	310,643	100.0

6. Pension obligations

Actuarial valuations for funding purposes are required annually under the PBSA. The most recent valuation was performed as at January 1, 2025, by Mercer (Canada) Limited, a firm of consulting actuaries. The economic assumptions used to determine the actuarial value of pension obligations were developed by referencing expected long-term market conditions.

As at December 31	2024	2023
Discount rate	5.5%	5.5%
Salary escalation rate	2.75% + merit (age)	2.75% + merit (age)
Inflation rate	2.00%	2.5% for 2024, 2.00% thereafter
Mortality (tables issued by the CIA)	CPM2014Publ (scale CPM-B)	CPM2014Publ (scale CPM-B)
Plan membership		
Active members	1,898	1,897
Pensioners	2,006	1,985
Deferred members*	507	504

* Deferred members are former employees of the Bank who are entitled to a pension starting in the future.

Funding surplus

The surplus for financial statement purposes differs from that calculated on a going-concern funding basis, owing to the use of a smoothed actuarial value of assets for funding purposes. The going-concern funding surplus is calculated in accordance with applicable legislation and actuarial standards.

The actuarial value of net assets available for benefits has been determined using a smoothing method that recognizes excess investment gains and losses occurring in a calendar year on a straight-line basis over five years. Excess gains and losses are determined by reference to the investment-return assumption for going-concern valuation purposes (5.5% for the years ended December 31, 2024 and 2023).

A reconciliation of the components of the measurement differences between the surplus on a going-concern funding basis and the surplus for financial statement purposes is as follows:

As at December 31	2024	2023
Funding surplus	560,000	597,000
Actuarial asset value adjustment	(48,711)	(122,050)
Surplus for financial statement purposes	511,289	474,950

7. Administrative expenses

As at December 31	Note	2024	2023
Investment management fees*		13,358	12,220
Pension administration fees		1,231	941
Audit and actuarial fees		158	225
Other administration fees	8	1,699	1,680
Tax expense		260	298
Total administrative expenses		16,706	15,364

8. Related parties

Persons or entities considered related parties to the Plan are:

- entities under control of the Plan, including 9439897 Canada Inc., 12747533 Canada Inc., and 12747570 Canada Inc.
- the Bank of Canada, the sponsor and administrator of the Plan
- members of key management personnel

Throughout the year, the Plan transferred funds to the following related corporations for investment and tax management purposes.

9439897 Canada Inc.

During 2024, net cash transfers to the Plan from 9439897 Canada Inc. were \$9.3 million (from the Plan to 9439897 Canada Inc. of \$7.5 million in 2023).

12747553 Canada Inc.

During 2024, net cash transfers to the Plan from 12747553 Canada Inc. were \$29.9 million (from the Plan to 12747553 Canada Inc. of \$32.1 million in 2023).

12747570 Canada Inc.

During 2024, net cash transfers to the Plan from 12747570 Canada Inc. were \$3.2 million (\$2.5 million in 2023).

Bank of Canada

Transactions with the Bank were conducted in the normal course of operations during the year and measured at the exchange amount. Included in Administrative expenses is \$1.5 million (\$1.5 million in 2023) for administration services provided by the Bank to the Plan.

Key management personnel and compensation

Key management personnel of the Plan consist of the Pension Committee and the Board, and the Plan is not charged for the compensation of these individuals. If a reasonable allocation of the compensation for key management personnel was performed, the amount would not be significant.

9. Pension plan surplus and capital requirements

The capital of the Plan consists of the pension plan surplus. Excluding the impact of investment income, the Plan is funded through a combination of employee and employer contributions. The pension plan surplus represents the difference between the net assets available for benefits and the pension obligations on a going-concern basis. Actuarial valuations, which aid in the determination of the extent of Plan capital, are performed annually.

Pension plan surpluses or deficits, as they arise, as well as other relevant aspects of the Plan, are managed to comply with the externally imposed requirements of the ITA and the PBSA.

In the case of a pension plan surplus, the ITA prohibits the making of contributions while the surplus exceeds 125% of the current value of the Plan's liabilities on a going-concern basis, if the Plan is also fully funded on a solvency basis (solvency ratio in excess of 105%). However, when the Plan is not fully funded on a solvency basis, the PBSA requires contributions from the plan sponsor and the ITA allows these contributions even if the surplus exceeds 125% of the current value of the Plan's liabilities on a going-concern basis. Last year, the January 1, 2024, actuarial results prepared by the Plan's independent actuaries concluded that the Plan had a strong funding position on a going-concern basis but a deficit on a solvency basis.

The Bank is responsible for contributing the amount needed above the employees' contributions in order to fund benefits accrued by members during the year (nil in 2024 and \$12.2 million 2023). In the case of a funding deficit on either a going-concern or solvency basis (calculated on an average over the previous 3 years), additional contributions are required in accordance with the PBSA to fund the deficit. In 2024 the Bank made no special contributions to fund a solvency deficit (\$0.5 million in 2023). The PBSA also requires additional contributions to cover transfer deficiencies for members electing to transfer the value of their benefit entitlement out of the Plan. There were no such contributions in 2024 (no such contributions in 2023).

The January 1, 2025, actuarial valuations results prepared by the Plan's independent actuaries are as follows:

- On a going-concern basis, the Plan had an actuarial surplus of \$560 million and a funding ratio of 132% (actuarial surplus of \$597 million and a funding ratio of 136% as at January 1, 2024).
- On a solvency basis, the Plan had an actuarial surplus of \$286 million and a solvency ratio of 114% (actuarial surplus of \$285 million and a solvency ratio of 115% as at January 1, 2024).

As a result, due to the strong funding position of the Plan, both on a going-concern and a solvency basis, regulations under the ITA prohibit the Bank from contributing to the Plan. The Bank will use the surplus to fund its portion of the 2025 current service costs. Net employer contributions for 2025 are expected to be nil.

During the year ended December 31, 2024, the Plan and its sponsor were not in violation of any externally imposed legal or regulatory requirements.

10. Commitments

The Plan has commitments with investment managers to fund real estate and fixed income investments. The commitments can be called upon at the discretion of the investment managers in accordance with the agreed upon terms and conditions. As at December 31, 2024, the commitments amounted to US\$102.4 million (equivalent to Can\$147.3 million). The Plan has sufficient liquidity to meet these commitments as they come due.