

STRATEGIC PROPERTY ACQUISITION AND MANAGEMENT POLICY

1. Purpose

This Policy is a framework that was approved by the Regional Consultation Committee/ Regional Implementation Committee of the Huron-Superior Métis Community on June 12th in 2025 to allow for the strategic acquisition of real property to occur, based on a clear and transparent set of criteria and with the appropriate governance. This policy will clearly delineate who is responsible for the property acquisition approval and subsequent management, ensuring that all purchases align with organizational objectives, legal requirements, and fiscal responsibility.

2. Scope

This policy applies to all acquisitions of real property (land and buildings) by the Secretariat of the Métis Nation of Ontario, on behalf Huron-Superior Regional Métis Community whether by purchase, lease, donation, or other means, and includes any right, interest or benefit in land. This policy applies to both Huron-Superior Regional Métis Community councils (Historic Sault Ste. Marie Métis Council and the North Channel Métis Councils), any staff, agents or consultants acting on behalf of the Community authorized to acquire real property on behalf of the Community. This policy shall be in effect until such time as the Region obtains incorporation status independent of the Métis Nation of Ontario, and may be amended at any time via motion. No amendments to this policy shall absolve the Regional Métis Community of its responsibility to maintain the property in good financial and physical standing.

3. Definitions

Acquisition: obtaining an interest in Real Property through a purchase or other means.

Appraisal: an estimate or opinion of value or the act or process of estimating value.

Community: means the Huron-Superior Regional Métis Community.

Community-Mandated Programs: initiatives supporting the citizens of the Huron-Superior Métis Community.

Community Council: one of the two elected, chartered Métis Nation of Ontario Community Councils – the Historic Sault Ste. Marie Métis Council and the North Channel Métis Council.

Building Needs Assessment: a report documenting the need for and purpose of acquiring real property.

Due Diligence: Investigation of legal, financial, and physical aspects of a property before acquisition.

Land assembly: the process of combining two or more small adjacent properties into a single parcel. This is done by neighbouring property owners selling their properties together. Land assembly is most common in areas where individual properties are too small to be developed on their own

Market Value: the amount that land and improvements might be expected to realize, if sold in the open market by a willing seller to a willing buyer.

Real Property: includes interests in land including, but not limited to, fee simple, temporary or permanent Easement, leasehold, licence, consent to enter, management and operations agreement

and Encroachment, and ii. All buildings and structures constructed thereon.

4. Policy Statement

The Strategic Property Acquisition and Maintenance Policy aims at providing a transparent and objective framework to allow the Huron-Superior Métis Community to strategically and proactively acquire real estate assets, and maintain those properties in good standing. All property acquisitions by the MNO on behalf of the Huron-Superior Métis Community shall:

- Support strategic goals or operational needs.
- Be approved in accordance with organizational governance and financial thresholds.
- Undergo appropriate due diligence.
- Comply with all legal, regulatory, and environmental requirements.
- Enable the Community and Councils to respond to future and/or anticipated service and program demands based on the long-term goals of the Regional Métis Community and where appropriate the broader Métis Nation of Ontario
- Enable the Community to proactively pursue property that becomes available and respond to favourable opportunities in the marketplace; and
- Reduce overall costs associated with real estate acquisitions and increase efficiency by avoiding missed opportunities.

5. Acquisition Process

- a. **Building Needs Assessment:** Identify and justify the need for property acquisition. Strategic acquisition opportunities will be evaluated by Regional staff or leadership of the Huron-Superior Métis Community who will provide its recommendations to the PCMNO, in conjunction with the Building Needs Assessment, explaining the property acquisition need following the steps laid out below.
- b. **Search and Selection:** Evaluate multiple properties (where applicable) based on two main principles:
 - i) Expectation that the Community will have to purchase the property, or a similar property, in the future at a higher cost; and/or
 - ii) Opportunity, due to timing or circumstances, to purchase lands at an advantageous price (i.e. distressed sales or land assembly). The business case prepared by Regional Staff or Contractor as determined by leadership, will consider the criteria outlined in Table 1 of the Appendix.
- c. **Due Diligence:**
 - Title search
 - Environmental assessments

- i) The Huron-Superior Métis Community shall complete an environmental pre-screening on all real property to be acquired to identify potential contamination issues associated with real property. A Phase I Environmental Site Assessment (ESA) may be required. All such ESAs shall be completed in accordance with the Canadian Standards Association (CSA) and site remediation criteria, as set out by provincial regulations. Whenever possible or appropriate, acquisition agreements may provide for the indemnification of the MNO Secretariat on behalf of the Huron-Superior Métis Community by the vendor for environmental conditions.

- Structural inspections
- Appraisal and valuation
- Legal and zoning review

d. **Financial Review:** Conduct cost analysis, funding source identification, and budget review.

- i) A portion of the council's regional funds will be deposited in a Strategic Property Acquisition and Management Fund ("S.P.A.M.F.") to fund the acquisition and management of strategically important properties. Where there is no pre-existing agreement or access to external funding source to purchase property that becomes available, and it is determined that the property is strategically important to the Community, the S.P.A.M.F. is an appropriate funding source to acquire real property. To ensure that there are sufficient funds in the S.P.A.M.F. to support the acquisition and management of the property, it is suggested that the following mechanisms be used to contribute funds to the S.P.A.M.F:

- A target of 20% of property's value be set-aside from councils' funds, or funds generated by agreements with external proponents will be identified, and, once realized, will be deposited in the S.P.A.M.F. to be used for the strategic acquisition of real property. This will provide a source of funding for otherwise unfunded acquisitions.

- Net proceeds from the sale or rental of existing real estate assets be deposited in the S.P.A.M.F. to fund future capital requirements, in accordance with the strategic needs of the community.

- ii) The community council may also accept a donation (i.e. a voluntary gift of Real Property given without compensation or consideration) if an appropriate community purpose has been identified for the property.

Before acceptance or rejection of a gift of real property, an analysis to determine the conditions of the gift, and assumption of liabilities or any tax implications, shall be carried out. An independent appraisal shall determine the market value of any donated real property, and a satisfactory Phase I Environmental Site Assessment may also be required. Any costs associated with the above will be borne by the council.

- iii) The Municipal Property Assessment Corporation (MPAC) assesses the value of lands and facilities and provides the assessment values for all properties in the Province of Ontario. The council wishing to purchase real property will be responsible for paying all taxes assessed by MPAC.

- e. **Approval:** If, following the evaluation by PCMNO it is determined that a property is strategically important for the Community to acquire, and there are uncommitted funds available in the S.P.A.M.F. for this purpose, authority for the transaction will be obtained in the usual course (see below).
 - o To provide additional oversight in this circumstance, authority to approve the acquisition of strategically important properties will be conditional upon approval by the by the Provisional Council of the Métis Nation of Ontario (PCMNO). All Real Property transactions for which this policy applies, requires the approval of the PCMNO, following the recommendation by the Regional Consultation Committee/ Regional Implementation Committee of the Huron-Superior Regional Métis Community, as evidenced by a motion. All such acquisition requests will be supported by a Building Needs Assessment explaining the rationale for the Acquisition, along with proof of approval through the current or capital budget process (i.e. identification of the funding source). The form and content of the report shall be at the discretion of the Region. The council is responsible for ensuring there is sufficient budget is in place before any negotiations commence with a property owner. The PCMNO must be satisfied with environmental condition of the Real Property prior to the transaction proceeding to close. The council will initiate negotiations upon receipt of a written approval from PCMNO via PCMNO Executive. The Secretariat of the MNO shall be the Real Property owner with the Chartered Community Council acting a Beneficial Property Owner, until such time as the Historic Sault Ste. Marie Métis Council or the North Channel Métis Council, or the Huron-Superior Regional Métis Community as appropriate and agreed to in writing, assume responsibility for the property. Should the regional government, or appropriate council fail to assume responsibility, the policy shall permit the Secretariat of the MNO to sell the property.
- f. **Negotiation and Purchase:** Engage in contract negotiation and close the transaction with legal oversight.
- g. **Documentation and Records:** Maintain all records in compliance with records management policies.

6. Ethical Considerations

All acquisitions must avoid conflicts of interest, uphold transparency, and ensure fair dealing. Staff, leadership, or volunteer representatives involved must disclose any personal or financial interests in potential acquisitions.

7. Monitoring and Review

This policy will be reviewed annually or as needed by the Regional Consultation Committee/ Regional Implementation Committee, and revised to reflect changes in law, strategy, or operational requirements.

Appendix 1:

Table 1 - Strategic Acquisition Criteria

Strategic Fit	<ul style="list-style-type: none">• Enable Community Strategic Priorities (i.e. Meeting Space; Accessibility; Climate Change / Resilience; Cultural Value; Financial Sustainability)• Fit with Community Strategic Plan• Opportunity cost if not pursued
Financial Impact	<ul style="list-style-type: none">• Expected purchase price and carrying costs at market value or less• Potential for interim lease cash flow until final development• Potential to recoup capital investment if no longer required• Difficulty to purchase similar or equivalent asset in future• Favorable assessment of risk• Available funding sources and sponsors
Use Assessment	<ul style="list-style-type: none">• Suitability of property and location• Connection to other Community-owned or run assets• Potential opportunities and synergies with other Program areas (i.e. co-location) And how all this will help pay for the operational costs

Further evaluation criteria include location, cost, and potential risks. A comprehensive analysis of any potential property acquisition shall be conducted by the Huron-Superior Métis Community and the council responsible for the real property acquisition, which shall also consider whether a property may have a heritage designation or Métis historical value. This analysis will include:

- Identification of the heritage designation or historical value of the real property
- Confirmation of the Métis Nation of Ontario programs to be implemented at this property and the long-term use or protection of the real property
- Assessment of the impact of the operations of the real property on the heritage value of the property
- Development of an asset management plan, which forecasts the capital renewal and re-investment requirements, to preserve the heritage property.