

Important Information

Odlum Brown USA Investment Management Limited (OB USA), a U.S. Securities and Exchange Commission (SEC) Registered Investment Adviser, wants to provide you with important information that will assist you in understanding how we conduct our business and keep you informed regarding our practices.

OB USA is located at Suite 1100 - 250 Howe Street, Vancouver, BC, V6C 3S9, Canada.

Privacy Policy

At OB USA, your privacy is our priority.

We collect personal information to open your accounts, to manage your portfolios and to help us provide a better level of service. We protect the security and confidentiality of the personal information that we collect.

We may amend our Privacy Policy from time to time to accommodate changes in our services, technology or as a result of a legal development. Each time you submit personal information or use our services, you agree to be bound by the current terms of our Privacy Policy.

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information and we will do everything we can to maintain that trust. The following are details of our approach to privacy.

1. **We do not sell your personal information to anyone.**
2. **OB USA only shares personal information with third parties and affiliate companies that help us process transactions or service your account (for example executing your trades, acting as your custodian, or mailing your account statements).**

We may also disclose or report personal information in limited circumstances where we believe in good faith that disclosure is required by law (for example, to cooperate with regulators or law enforcement authorities, resolve client disputes, perform credit/authentication checks, or for risk control).

We may use third party providers of information technology and data processing services that may store and/or process your personal information outside of Canada. Your personal information may be disclosed in response to valid demands or requests from government agencies under applicable law in those jurisdictions.

Outside of these exceptions, we will not share your personal information with third parties unless you have specifically asked us to do so.

3. **We collect personal information in the normal course of business in order to administer your accounts and serve you better.**

Application and registration information: We collect information that you provide to us when you open an account, make application to or through OB USA for the purchase of a securities product or service.

The information we collect may include name, address, phone number, e-mail address, Social Security number, financial information and information about your investment desires and experience. We also may collect information from consumer reporting agencies to verify your identity in the account opening process.

Transaction information: Once you have an account with us, to administer your account and better serve you we collect and maintain personal information about your transactions, including balances, positions and history, and may include your name or other data in an internal client list that reflects your activities at OB USA and with outside contracted providers.

4. We use your personal information to fulfill our regulatory obligations and to help us deliver the best possible service to you.

OB USA is required by its various regulatory authorities such as the SEC and state jurisdictions to collect, review and maintain certain personal information such as investment history or financial data. Also, the USA PATRIOT Act requires that OB USA collect and verify certain personal information to assist it in verifying the identity of its clients and the sources of funds in an effort to prevent money laundering and terrorism.

5. We protect the confidentiality and security of your personal information.

Companies we hire to provide support services are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested. We restrict access to personal information to select employees and agents who have a need to know such information for business purposes only. All such employees are trained and required to safeguard such information. We also maintain physical, electronic and procedural safeguards to guard your personal information.

6. We continue to evaluate our efforts to protect personal information and make every effort to keep your personal information accurate and up to date.

If you identify any inaccuracy in your personal information, or you wish to make a change to that information, please contact us so that we may promptly update our records.

7. We will provide notice of changes in our information-sharing practices.

If, at any time in the future, it is necessary to disclose any of your personal information in a manner that is inconsistent with this policy, we will give you advance notice of the proposed change so that you have an opportunity to opt out of such disclosure.

If you have any questions or concerns, please contact us by e-mail at info@odlumbrownusa.com or call us at 1-866-636-8222.

OB USA Trade Executions

OB USA directs its trade executions to selected broker dealers who are registered with the SEC and members of the Financial Industry Regulatory Authority (FINRA). Securities trades are subject to standard brokerage agency and other fees. OB USA does not receive compensation for directing order flow to any broker dealer. Executing broker-dealers have an obligation to use reasonable diligence to ascertain the best inter-dealer market for the subject security and buy or sell in such market so that the resultant price to the client is as favorable as possible under prevailing market conditions.

Bond transactions are executed on a Principal basis with Odlum Brown Limited. The term "Principal" means that the transaction was executed from an inventory position held by Odlum Brown Limited. No mark-up is applied to these principal transactions.

Proxy Voting

OB USA votes proxies on your behalf. This authority obligates OB USA with a fiduciary duty to vote with the best interest of its clients in mind, using its best judgment under each specific circumstance. OB USA keeps a record of proxy votes and will furnish voting details of specific situations upon request. For information please contact your Portfolio Manager.

Important Information You Need to Know About Opening an Investment Management Account

To assist in the fight against the funding of terrorism and money laundering activities, U.S. federal law requires financial institutions to obtain, verify, and record information that identifies each person who opens an account.

When you open an account, OB USA is required to collect information from you such as: your name, your date of birth, your address, and your identification number:

- U.S. Citizen: taxpayer identification number (social security number or employer identification number)
- Non-U.S. Citizen: taxpayer identification number, passport number, and country of issuance, alien identification card number, or government-issued identification showing nationality, residence, and a photograph of you.

You may also need to show your driver's license or other identifying documents.

A corporation, partnership, trust or other legal entity may need to provide other information, such as its principal place of business, local office, employer identification number, certified articles of incorporation, government-issued business license, a partnership agreement, or a trust agreement.

U.S. Department of the Treasury and SEC rules already require you to provide most of this information. These rules also may require you to provide additional information, such as your net worth, annual income, occupation, employment information, investment experience and objectives, and risk tolerance.

If you cannot provide the required information, OB USA may not be able to open an account or carry out transactions for you. If we have already opened an account for you, we may have to close it.

We thank you for your assistance with these requirements, and hope that you will support the financial industry's efforts to deny terrorists and money launderers access to the financial system.

Business Continuity Summary and Disclosure Statement

Pursuant to SEC regulation, OB USA has created a Business Continuity Plan. This plan is for use in the event that OB USA was to become the subject of a significant business interruption, ranging from an interruption effecting simply our Vancouver location, or a larger area such as Greater Vancouver or the Pacific Coast. The OB USA recovery time for such an event will vary depending upon the severity and significance of the event.

Due to our executing relationship with selected and qualified broker dealers, our data processing relationship with Broadridge Financial Solutions, Inc. with its primary location in Toronto, Ontario, and with our multiple branch locations as far away as Kelowna, British Columbia, OB USA can continue to operate from several locations. However, we have identified a primary, specific, off site location where OB USA operations will move should there be a significant business interruption.

For telephone communications, we will attempt to maintain our client's ability to contact OB USA at 1-866-636-8222 if at all possible. Should you have any questions regarding this summary, please call 1-866-636-8222.

Our Brochure

Our current Investment Advisory Brochure (ADV Part 2A and 2B) is available to all clients upon request.

Aggregation of Accounts

OB USA endeavors to allocate securities purchases and sales so as to not advantage nor disadvantage any client. A random selection process is normally used such as starting at either the beginning, the end or in the middle of the alphabetical list of clients. It is the policy of OB USA that when securities are being initially purchased for, or sold from, a client's portfolio, orders for the same securities from OB USA and associated person's accounts will be included in the aggregated transaction if the size and volume is large and the market is liquid, and purchased last and sold last if the market is thin and illiquid so as to not disadvantage clients.