

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 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.

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