Relationship Disclosure Information

February 2026

Securities legislation in Canada requires that Nalmont Capital Inc. (hereinafter referred to as **Nalmont**, the **Firm**, **we** or **us**) make certain disclosures to each of its clients (hereinafter referred to as either the **Client** or **you**). These disclosures must describe the nature of Nalmont's activities which could have an impact on your relationship with us, as either your portfolio manager or exempt market dealer, including the products and services offered by Nalmont, and inform you of conflicts of interest that may arise between you and Nalmont. We are obligated to make certain disclosures so that you may understand the nature of your relationship with us and our affiliates. We are also required to make certain disclosures under provincial and federal laws such as privacy legislation so that you are aware of our policies.

This Relationship Disclosure Information document (**RDI**) will be provided to you at the time of account opening/when you engage us as exempt market dealer and it will also be accessible on our web page. If there is a significant update to the information in this RDI, we will provide you with the updated information as soon as possible. The requirement to provide you with this document does not apply if you are a "Permitted Client", as defined in National Instrument 31-103 *Registration Requirements, Exemptions and Ongoing Registrant Obligations* (**NI 31-103**), and if you are not an individual.

Please read this document carefully, retain it for future reference and let us know if you have questions. As required by securities laws, we will provide you with an amended version of this RDI in a timely manner if any significant change occurs.

Who are we?

Nalmont, whose head office is located in Montreal, Québec, is registered as a portfolio manager, exempt market dealer and investment fund manager in the provinces of Québec, Alberta and Ontario (each a **Jurisdiction**), as a derivatives portfolio manager in Québec and as a commodity trading manager in Ontario.

Nalmont was founded in partnership with LFIS Capital SAS (**LFIS Capital**), a Paris-based investment management firm, Walter Global Asset Management Inc. (**WGAM**) and Nalmont's Managing Partners.

As an asset manager, Nalmont offers investment strategies based on research and innovation. The use of derivatives in our implementation provides flexibility and capital efficiency, optimizing performance while effectively managing risk.

The Firm acts as investment fund manager and portfolio adviser for certain investment funds (the **Nalmont Funds**). Nalmont may implement your investment strategies by investing your assets in the Nalmont Funds or in other investment funds. Units of certain Nalmont Funds are offered through prospectus and through prospectus exemptions. Nalmont uses research-driven derivatives strategies in the management of the Nalmont Funds. The Firm offers both traditional and alternative investment strategies as well as advanced portfolio solutions. Our Firm leverages extensive expertise in quantitative portfolio management, liquid alternative strategies, financial derivatives, and structured products to provide sophisticated, flexible, and capital-efficient investment options for a broad range of institutional investors and financial intermediaries.

The investment strategies offered to portfolio management clients of Nalmont (**PM Clients**) will be managed exclusively by Nalmont as managed accounts and sub-advised products and solutions. Although the operational responsibility will ultimately lay with the Client, Nalmont will work closely with such Clients to advise and facilitate the opening of broker accounts and address issues around collateral management. The strategies are systematic and rely on proprietary algorithms. These models are regularly updated and tested to ensure they are adapting to evolving market and technological conditions. The Firm offers investment management services to family offices, high-net-worth and ultra-high-net-worth investors, foundations and endowments, and registered pension funds in Canada.

Nalmont, in its capacity as exempt market dealer, offers certain proprietary and non-proprietary investment opportunities to clients (**EMD Clients**).

Information About Our Services

As a registered Adviser in the Jurisdictions, Nalmont provides discretionary investment management services to its Clients (as described below), pursuant to such Client's Investment Management Agreement (each **IMA**) and in accordance with each Client's investment policy statement (each an **IPS**) or Sub-Advisory Agreement. As a registered exempt market dealer, Nalmont provides non-discretionary investment services to EMD Clients with respect to the purchase or sale of exempt market products consisting of both proprietary and non-proprietary products. In each case, Nalmont collects the client's "Know your client" (**KYC**) information consisting of their: (i) personal and financial circumstances; (ii) investment needs and objectives; (iii) investment time horizon; (iv) investment knowledge; and (v) risk profile (tolerance and capacity), which helps Nalmont make appropriate investment decisions and recommendations. Furthermore, Nalmont has a regulatory obligation to assess whether the purchase or sale of a security is suitable for each Client prior to executing the transaction or at any other time. When conducting such an assessment, we must put your interests first.

Nalmont's directly managed and sub-advised products and solutions will be marketed and serviced by its investment management team. Prospective Clients (both PM Clients and EMD Clients) will mainly consist of "Permitted Clients" which will include sophisticated institutional investors (i.e., pension funds, foundations, endowments etc.) or family and multi-family offices. This RDI is provided to Clients who (i) are qualified as "accredited investors" under National Instrument 45-106 – *Prospectus Exemptions*; and/or (ii) establish a separately managed account for which Nalmont acts as investment adviser.

Investment Policy Statement

Each Managed Account for a PM Client (each an **Account**) must have a separate IPS. The IPS defines the framework that will guide the investment decision process and establish the prudent and appropriate basis for the management of each Client's Account.

The IPS captures most of the information obtained by Nalmont during the KYC and suitability information gathering process. Using this information together with other relevant information provided by you, Nalmont will help you establish the IPS based on your:

- personal and financial circumstances;
- investment needs and objectives;
- investment time horizon;
- investment knowledge;
- risk profile (tolerance and capacity);
- asset allocation (including concentration); and
- expectations in terms of the services to be provided to you.

Risks

Each investment that is recommended or made by Nalmont on your behalf is subject to a variety of risks, including (but not limited to) market, economic, political, business and currency risks. For more information regarding the specific risks applicable to a specific investment, please see the applicable offering documentation applicable to the investment.

No Guaranteed Return

There is no guarantee that the investments in your investment portfolio (each a **Portfolio**) with us will earn any positive return in the short or long term. The value of your Portfolio may increase or decrease depending on market, economic, political, regulatory and other conditions affecting your portfolio. Your IPS with us will include but will not be limited to setting objectives, defining risk/return constraints and considering time horizons.

Achievement of Investment Objective

There is no assurance that your Portfolio will achieve a desired investment return. As a Client, your investment is not guaranteed. Therefore, the greatest risk to you as an investor is that you could lose all or part of your investment. Unlike bank accounts or guaranteed investment certificates, stocks, bonds, money market securities, funds or other exempt securities are not covered by the Canada Deposit Insurance Corporation or any other government deposit insurer.

General Market Risk and Price Volatility

Your Portfolio may experience greater volatility in its value than other funds due to the general economic and financial conditions applicable to the investments it makes.

Generally, your investments may be affected by general economic and market conditions, such as interest rates, availability of credit, inflation rates, economic uncertainty, changes in laws, and national and international political circumstances. In addition, unexpected and unpredictable events such as war, a widespread health crisis or global pandemic, terrorism and related geopolitical risks may lead to increased market volatility in the short term and may have adverse more general long-term effects on world economies and markets, including U.S., Canadian and other economies and securities markets.

The effects of similarly unexpected disruptive events could impact world economies and securities markets in ways that cannot presently be anticipated, aggravate other existing risks, and may cause material adverse effects to the holdings in your Portfolio.

Portfolio Concentration Risk

If a Portfolio invests a large proportion of its assets in securities issued by one issuer, in a single asset class or in a single sector, it will have risks relating to concentration. When a Portfolio is not diversified, it could experience greater volatility and will be strongly affected by changes in the market value of these securities.

Equity Securities

More specifically, Portfolios that invest in or have exposure to equities, also called stocks or shares, are affected by stock market movements. When the economy is strong, the outlook for many companies will be favorable, and share prices will generally rise, as will the value of the portfolio that owns these shares. On the other hand, share prices usually decline in times of general economic or industry downturn. The price of equity securities of certain companies or companies within a particular industry sector may fluctuate differently than the value of the overall stock market because of changes in the outlook for those individual companies or industries.

Specific Issuer Risk

The value of all securities will vary positively or negatively with developments within the specific companies that issue the securities. Changes in the value of the business of the specific issuer may affect the value of your portfolio. The price of a security is influenced by larger economic conditions, the market and by the specific outlook for the issuer.

Regulatory Risk

Changing government regulations may significantly affect the value of your portfolio and the value of the Fund’s securities. Restrictions on ownership, environmental laws, taxation, deregulation, monopoly grants, subsidies imposed or removed are just a few examples of regulatory risk.

Stock Market Risk

The value of most securities, in particular equity securities, are affected by general economic and market conditions.

Speculative Investment Risk

Nalmont proposes investment strategies that may be deemed speculative and are not intended as a complete investment program. Nalmont's proposed investment strategies should be considered only by persons financially able to maintain their investment and who can bear the risk of loss associated with an investment in these investment strategies. Investors should review closely the investment objectives and investment strategies to be utilized by Nalmont as outlined herein to familiarize themselves with the risks associated with an investment in the proposed investment strategies.

There is no assurance that the investment strategies will be able to achieve their investment objectives.

Risks relating to Foreign Investments

A Portfolio that invests in foreign countries may face increased risk because the standards of accounting, auditing and financial reporting in these countries may not be as stringent as in Canada and the U.S. These countries may be less regulated, and firms may receive less complete information on the securities they buy. A change of government or a change in the economy can affect foreign markets. Governments may impose exchange controls or devalue currencies. This would restrict the ability of a firm to withdraw investments. Some foreign stock markets are less liquid and more volatile than the North American markets. If a market has lower trading volumes, it can restrict the firm's ability to buy or sell securities. This increases the risk for a portfolio that only invests in foreign securities.

Commodities

To the extent Nalmont invests your assets in commodities within sub-sectors such as energies, metals, grains, soft commodities, your assets will be influenced by changes in the price of such commodities. Commodity prices can change significantly as a result of supply and demand, speculation, international monetary and political factors, government and central bank activity, and changes in interest rates and currency values.

Derivatives

A derivative is a contract between two parties. The value of the contract is "derived" from the market price or value of an underlying asset, like currency or stock, or an economic indicator such as interest rates or stock market indices.

Examples of derivatives include:

Options – which are securities that give the mutual fund the ability to buy or sell a security at a pre-set price until a future date, but the mutual fund need not elect to do so.

Forward Contracts – which are similar to options, but instead they require a mutual fund to purchase or sell a security or commodity at a pre-set price at a future date or exchange the equivalent value of the forward contract in cash. The counterparty (i.e., the person (normally an investment dealer or financial institution) with whom a mutual fund enters into a derivative transaction) to the forward contract will be obliged to pay the mutual fund any increase in the value of the forward contract, or the mutual fund will be obliged to pay the counterparty any decrease in the value of the contract.

Futures Contracts – which are standardized forward contracts that trade on a futures exchange.

Swaps – which are arrangements under which a mutual fund agrees to exchange cash flows from different financial instruments with another party. Some examples include an interest rate swap in which a mutual fund agrees to exchange a fixed rate of interest on a bond for a floating rate of interest on another bond of the same amount, and a credit default swap in which a premium is paid by a mutual fund for a right to receive payment if a bond issuer commits certain specified defaults.

Nalmont may use derivatives to:

- offset or reduce the risk of changes in currency values, securities prices or interest rates (otherwise known as hedging);
- lower transaction costs, provide greater liquidity, and increase the speed with which a mutual fund can change its portfolio; and/or

- increase profits by entering into futures contracts based on stock market indices or by using derivatives to profit from declines in financial markets.

The use of derivatives does not guarantee that there won't be a loss or that there will be a gain or that hedging strategies will be effective. As well, there are risks to using derivatives, including that:

- there may not be a market when a fund wants to meet the terms of its derivative contract;
- the other party to the derivative may be unable to fulfill its obligations;
- a fund may have a derivative contract with a dealer who goes bankrupt;
- the derivative may be based on a stock market index where trading is halted on a substantial number of stocks in the index or there is a change in the composition of the index; and/or
- a fund may be unable to close out its positions because of daily trading limits on options and futures contracts imposed by stock exchanges.

Interest Rate Risk

Your Portfolio can be affected by interest rate fluctuations. A drop in interest rates may reduce the return of money market securities. An increase in interest rates may reduce the return of portfolios holding debt or fixed income securities.

Time Horizon

The time horizon of an account has a direct effect on the amount of risk you can withstand, and on the return your portfolio can generate. The holdings in your portfolio corresponding to the current IPS will generally be held long term. As a general rule, the longer the time horizon, the more risk can be taken in your Portfolio and therefore the higher the level of equity that can be included in the asset mix. As your circumstances may change over time, so will our investment decisions and we may then recommend you change your IPS.

Liquidity and Market Characteristics

In some circumstances, investments may be relatively illiquid making it difficult to acquire or dispose of them at the prices quoted on the various exchanges. Accordingly, your Portfolio's ability to respond to market movements, especially on the OTC market, may be impaired and your Portfolio may experience adverse price movements upon liquidation of its investments. Settlement of transactions may be subject to delay and administrative uncertainties.

Trade execution and selection of brokers and dealers

Many of the trading techniques used by Nalmont require the rapid and efficient execution of transactions. Inefficient executions can result in Nalmont being unable to exploit the small pricing differentials that we may seek to exploit and impact, possibly materially, the profitability of a Portfolio's positions. Our policy regarding purchases and sales for its Portfolios is that primary consideration will be given to obtaining the most favorable execution of the transactions in seeking to implement the investment strategy of the relevant Portfolio. We will effect transactions with those brokers, dealers, banks and other counterparties (collectively, "**brokers**" and "**dealers**") which we believe provide the most favorable net prices and who are capable of providing efficient executions. Additional considerations include the ability of brokers and dealers to provide internal and external research services, special execution capabilities, clearance, settlement or other services including communications and data processing and other similar equipment and services and the furnishing of stock quotation and other similar information. We may cause a broker or dealer who provides certain services to be paid a commission or, in the case of a dealer, a dealer spread for executing a portfolio transaction, which is in excess of the amount of commission or spread another broker or dealer would have charged for effecting that transaction.

Short Positions

A Portfolio may generate a short exposure through cash settled contracts for difference or financial derivative instruments. Short exposure allows the investor to profit from declines in market prices. The extent to which a Portfolio has short exposure will depend upon our investment strategy and perception of market direction. The generation of short exposure typically involves trading on margin and can involve greater risk than investments based on a long exposure. A short exposure involves the risk of a theoretically unlimited increase in the market price of the underlying security.

Counterparty Risk

A Portfolio will be subject to the risk of the inability of any counterparty (including the clearing broker) to perform with respect to transactions, whether due to insolvency, bankruptcy or other causes.

Credit Risk

The ability, or perceived ability, of an issuer of a debt security to make timely payments of interest and principal on the security will affect the value of the security. It is possible that the ability of the issuer to meet its obligation will decline substantially during the period when a Portfolio owns securities of that issuer, or that the issuer will default on its obligations. An actual or perceived deterioration in the ability of an issuer to meet its obligations will likely have an adverse effect on the value of the issuer's securities.

If a security has been rated by more than one nationally recognised statistical rating organisation, we may consider the highest rating for the purposes of determining whether the security is investment grade. A Portfolio will not necessarily dispose of a security held by it if its rating falls below investment grade, although we will consider whether the security continues to be an appropriate investment for a Portfolio. Some Portfolios may invest in securities which will not be rated by a nationally recognised statistical rating organisation, but the credit quality will be determined by us.

Credit risk is generally greater for investments issued at less than their face values and required to make interest payments only at maturity rather than at intervals during the life of the investment. Credit rating agencies base their ratings largely on the issuer's historical financial condition and the rating agencies' investment analysis at the time of rating. The rating assigned to any particular investment does not necessarily reflect the issuer's current financial condition, and does not reflect an assessment of an investment's volatility and liquidity. Although investment grade investments generally have lower credit risk than investments rated below investment grade, they may share some of the risks of lower-rated investments, including the possibility that the issuers may be unable to make timely payments of interest and principal and thus default.

Taxation

The after-tax return from an investment will depend in part on the composition for tax purposes of the distributions paid to a Client's account from the securities the Client has invested in (a portion of which may be fully or partially taxable or in exceptional circumstances may constitute non-taxable returns of capital). This composition may change over time, thus affecting the after-tax return to a Client's account, and the tax rates applicable to different types of income may change as a result of changes in government policies.

Changes in Tax Laws

There can be no assurance that Canadian federal income tax laws and the administrative policies and assessing practices of the Canada Revenue Agency will not be changed in a manner that may adversely affect your account.

Legal and/or Insider Issues

Securities regulations require that any client deemed an insider of a publicly traded company must disclose this to us. It is required for you to inform us, during the KYC process, if you are an insider of any public company or issuer.

Lack of Diversification

Since your portfolio may not be widely diversified, it may be subject to more rapid change in value than would be the case if the Portfolio were required to maintain a wide diversification among companies or industry groups.

Foreign Currency Risk

Many of the investments in your Portfolio, at any time, will consist of securities denominated in currencies other than the Canadian dollar (primarily the US dollar) and, accordingly, the net asset value will, when measured in Canadian dollars, be affected by fluctuations in the value of such currencies relative to the Canadian dollar.

Unique Preferences

There are no unique preferences or constraints that will affect ongoing investment decisions. If any changes in your situation should occur, please advise us as soon as possible so that we can take appropriate action.

Cybersecurity

As use of the internet and other technologies has become more prevalent in the course of business, organizations have become more susceptible to operational and financial risks associated with cybersecurity. Cybersecurity incidents can result from targeted attacks on systems and applications, malicious software, phishing attacks and theft of data, and may involve attempts to fraudulently induce employees or third-party service providers to disclose sensitive information to gain access to our data. While we have developed measures which are designed to reduce the risks associated with cybersecurity, there is no guarantee that those measures will be effective, particularly since the techniques that are employed tend to change frequently, and risk can originate from a variety of sources that have also become increasingly sophisticated. As such, cybersecurity failures or breaches of our systems or those of our service providers have the potential to cause operational disruptions, financial loss, misappropriation, or unauthorized release of confidential, financial or personal information, damage to computers and systems, violations of applicable privacy and other laws, regulatory penalties, additional compliance costs and reputational damage.

Nalmont will deploy best efforts to minimize the impact of these risks when investing your assets or recommending investments.

Leveraging

Borrowing of cash by Nalmont on your behalf and using that cash to purchase additional securities or other portfolio assets could magnify the impact of any movement in the prices of your Portfolio's underlying investments and, therefore, the value of your investment. Consequently, these investments may produce more volatile gains or losses compared to investing in the same investments without the use of borrowing.

We do not recommend that you borrow money to invest in the strategies we propose. If you borrow money to purchase securities, your responsibility to repay the loan and pay interest as required by its terms remains the same even if the value of the securities purchased declines.

Fees and Operating Charges Payable

The management fees paid by each PM Client to Nalmont are set out in your IMA with us. In consideration of the services to be rendered by Nalmont acting as a discretionary adviser, the PM Client shall pay to Nalmont a monthly management fee (and applicable taxes) with respect to the assets managed by Nalmont.

As an EMD Client, we do not directly charge you any fees in respect of the distribution of products/securities or our recommendations relating thereto, but you may indirectly pay embedded fees which consist of fees associated with the operation and/or management of the specific investment product or fund that you own. These fees and expenses are not charged directly to you but rather are charged directly to the product or fund as a percentage of its total assets. When you receive information about the value of your investment, such fees and expenses associated with that investment will typically already have been factored into the information, including any information about the investment's performance. Information regarding the fees associated with and any compensation paid to us will be included in the applicable offering documents of the investment.

Other fees and charges that you may incur in respect of the operation of your account(s) may include:

- **Administrative fees** – e.g., fees for automated services, registered account trustee and administrator fees;

- **Brokerage fees** – e.g., fees paid to dealers executing the trades following our instructions to buy or sell securities on your behalf;
- **Service fees** – e.g., custodial fees, account transfer fees, wire transfer fees; and
- **Interest charges** – e.g., if your account is on margin or in the event you do not make full payment when due in your cash account, we will charge interest on the overdue balance.

We will give you 60 days prior written notice of any changes to our management fee that relate to your account (such fees do not include interest charged to your account or commissions charged for executing trades).

Third party managers or other professionals (accountants, lawyers, tax experts, etc.) usually charge fees for their services. If you elect to use these services in addition to Nalmont services, these fees will be at your expense.

The fees, charges and other expenses described above will affect the returns on your investments in your account(s) by reducing the returns in proportion to the fees, charges and expenses. When considering the fees, charges and other expenses applicable to your account(s) and the investments you hold, you should understand that a fee, charge or other expense charged in relation to your account(s) and/or the investments you hold will compound over time as a deduction to the overall value of your investments. Every dollar used to cover fees or other expenses is one less dollar left to invest to compound and grow over time.

Referrals

We may enter in referral arrangements with certain third parties who refer Clients who may want to have an account or make investments at the Firm. A referral fee is any monetary or non-monetary benefits provided for the referral. If a potential Client is referred to the Firm, such Client will be provided with an appropriate referral notice, before the Firm acts for such Client, setting out, among other things, the parties involved, their specific roles and the referral fee to be paid (or how it is to be calculated) by the Firm to the third party.

Brokerage Expenses

When placing an order for and on behalf of an Account, Nalmont will use the brokers and dealers who, in our opinion, can provide best execution (after considering all transaction costs, research, and other benefits).

For more detailed information about how we select dealers to execute trades on your behalf, please refer to Nalmont's *Best Execution Policy*, attached to your IMA.

Custody of and Access to Your Assets

We do not hold physical custody of your investment assets. As a PM Client, for your protection, your assets must be segregated and held by a custodian that is subject to regulatory oversight, minimum capital, and insurance requirements. Custodians may register securities in their name, but you are the beneficial owner of those securities.

If you invest in segregated securities (individual stocks and bonds) with us, a custodian is required to custody those assets. You must select your own custodian, as we will not provide any recommendation of a particular custodian. Nalmont does not have custody over your assets. You will receive investment statements concerning your portfolio from your custodian. We encourage you to carefully review the custodial statements and to compare them with those received from Nalmont.

The Portfolio Valuation Report in your quarterly account statement package shows where your assets are held.

Investment assets held by a custodian may potentially be at risk of loss: (i) if the custodian becomes bankrupt or insolvent; (ii) if there is a breakdown in the custodian's information technology systems; or (iii) due to fraud, willful or reckless misconduct, negligence, or error of the custodian or its personnel. When acting as PM on your behalf, Nalmont has trading authority over your assets held by the custodian you select which allows us to buy, sell and settle trades for securities on your behalf in accordance with your Investment Policy Statement. We may in limited circumstances also have access to your assets held by the custodian where you have granted Nalmont written authorization. Those circumstances may include:

- if you have granted Nalmont authority to transfer funds from your investment account to your bank account or third party (for pre-existing arrangements only);
- to withdraw funds from your investment account to pay Nalmont's quarterly investment management fees; and
- if you have granted Nalmont authority to transfer assets between your investment accounts held at Nalmont.

Nalmont is not authorized to transfer securities or funds into or out of your investment account in any other circumstances. Granting Nalmont access to your assets—even in the limited circumstances set out above—exposes you to a potential risk of loss: (i) if there is a breakdown in our information technology systems; or (ii) due to fraud, willful or reckless misconduct, negligence, or error of Nalmont or its personnel. To reduce the risk of loss, Nalmont has strict operational controls and is required under securities laws to insure against the risk of loss from any access it may have to your investment assets.

As an EMD Client, your ownership interest in an investment will be registered on the security ledger of the applicable issuer of the security and will not be held in a custodial account. As such assets are not held by a custodian, they are not afforded the same protections as described above. For EMD clients, we do not hold or have access to client assets. During the subscription process, client funds will be held in a third party trust account/or in the investor's account at a financial institution prior to the issuance of the applicable securities, at which time the client's ownership interest will be registered on the securities ledger of the issuer. Any distributions paid to a client in respect of their ownership of an investment as an EMD client will be paid directly to the EMD client.

Know Your Client (KYC)

As a registrant under Canadian securities legislation, we are subject to "know-your-client" (**KYC**) obligations. These rules require us to collect certain information about each client and keep the information collected current. The information we collect during the KYC process includes information related to your personal and financial circumstances, investment needs and objectives, investment knowledge, risk profile, and investment time horizon. For clients that are not individuals, the information we collect during the KYC process includes information concerning the nature of the client's business, control structure, and specified beneficial ownership.

The information we obtain during the KYC process allows us to:

- establish your identity, and if necessary, make reasonable inquiries as to your reputation;
- establish whether you are an insider of a reporting issuer or any other issuer whose securities are publicly traded; and
- ensure that we have sufficient information to satisfy our suitability assessment for your account.

Upon opening an account with us, we will require that you complete a New Account Application Form in order to collect the required KYC information. The personal information gathered through this process allows us to evaluate the suitability of the securities we may transact for your account.

On an annual basis, or on an ad hoc basis as circumstances require, we will update your KYC information to ensure that it contains current information which we require to make suitable investment decisions for you.

Your Responsibility

It is important for us to maintain current KYC information to ensure that we can accurately assess your Account's suitability. It is therefore important that you notify us whenever there is a significant change in your circumstances so that we may update your KYC documentation. We are not responsible for any losses you may incur as the result of your failure to do so.

What is a significant change?

A significant change is a change that affects your personal or financial situation, your investment needs and objectives, your risk profile or your investment time horizon, as well as any change that can reasonably be expected to have a significant impact on your net worth or on your income since the last update of your file.

Suitability

To assess the suitability of proposed investments, we are required to ensure that all actions taken on behalf of your Account are not only suitable but are also placed in your best interests, and ahead of our own. As such, we have internal procedures to ensure that we place your interests first. In the event we are in the view that such a transaction or holding is not suitable or does not place your interests first, we will inform you accordingly.

Conflicts of Interest

For more information about Conflicts of Interest relating to our activities, we refer you to Nalmont's *Conflicts of Interest Disclosure*, attached here.

Reporting

We will ensure that you receive regular reports about your accounts/investments. The timing and frequency of the reports will vary depending on your activity and relationship. It is important that you carefully review each report that is sent to you and inform us promptly if you feel that there are any errors or discrepancies or if you have any questions or concerns.

Trade Confirmations

If you are an EMD Client, we will provide you with trade confirmations promptly after the completion of any purchase or sale of an investment.

Account Statements

In accordance with applicable securities laws, clients who are individuals and have Managed Accounts with us will receive an account statement, at least quarterly, an annual report on charges and other compensation as well as an annual investment performance report.

The account statement will include a record of each transaction which took place during the period. The statement will also outline the estimated net asset value of the applicable account. Other reports and statements may be obtained by each Client upon request.

In addition, your custodian(s) will also send you reports relating to your accounts. Clients having a Managed Account with us may or may not receive a trade confirmation from their custodians.

Annual Statements

On an annual basis, we will ensure that you receive a statement that provides the total amount of charges applicable to us providing services to you, including, but not limited to, any referral fees we received, plus any payments we received from issuers or other parties when having provided services specific to your account/investments.

Nalmont maintains Client information and documentation in the strictest confidence in accordance with Nalmont's Privacy Policy. A copy of the policy is published on our website.

Investment Performance Benchmark

A benchmark is an independent standard against which the performance of an investment portfolio can be evaluated. Benchmarks do not account for the impact of transaction charges or other expenses related to your investment account. Benchmarks are often a market index or combination of indices, which allow investors to compare the relative performance of their investment portfolios. An index tracks the performance of a broad asset class, such as all securities listed on a particular stock exchange, or narrower portion of the securities listed on an exchange (e.g., financial services company stocks).

You should refer to your account statement for further details on the benchmark used for your account or speak with your registered representative. Where requested by a client, Nalmont may provide customized performance reporting against a benchmark.

Trusted Contact Person & Temporary Holds

Trusted Contact Person

By choosing to provide information about a trusted contact person, the client authorizes Nalmont to contact the trusted contact person and disclose information about their investments to that person in the following circumstances:

a. Possible financial exploitation of the client;
b. Concerns about the client's mental capacity as it relates to financial decision-making or lack of decision-making;
c. The name and contact information of any of the following:
    a. A legal guardian of the client;
    b. An executor of an estate under which the client is a beneficiary;
    c. A trustee of a trust under which the client is a beneficiary; or
    d. Any other personal or legal representative of the client; or
d. To obtain the client's current contact information.

Temporary Holds

A temporary hold means a hold that is placed by Nalmont on the purchase or sale of a security on the client's behalf or on the withdrawal or transfer of cash or securities.

Nalmont will not place a temporary hold on client investments unless they reasonably believe that:

a. The client is a vulnerable client;
b. The client has been financially exploited, financial exploitation is occurring, has been attempted or will be attempted; or
c. The client does not have the mental capacity to make decisions involving financial matters.

Should a temporary hold be placed on client investments, Nalmont will provide notice of the temporary hold and the reasons for the temporary hold as soon as possible. The Firm will continue to review the relevant facts on an ongoing basis in order to determine if continuing the hold is appropriate. Within 30 days of placing the temporary hold and, until the hold is revoked, Nalmont will update clients on a monthly basis to inform them if they have revoked the temporary hold or provide notice of its decision to continue the hold, and the reasons for that decision.

Allocation of Investment Opportunities and Standards of Fairness

For more information as to how we allocate investment opportunities amongst our clients, we refer you to Nalmont's *Fair Allocation Policy* attached to your investment management agreement or subscription agreement.

Proxy Voting

Nalmont generally has discretion as to how to vote the securities in an Account. In exercising such discretion, and to minimize potential for conflicts of interest, Nalmont has proxy voting policies and procedures which attempt to ensure that securities are only voted in the best interests of its Clients. Nalmont also does not invest in securities of issuers in order to exercise control over, or to participate in, the management of those issuers. A copy of Nalmont's *Proxy Voting Policies and Procedures* is available upon request.

Borrowed Money

Using borrowed money to finance the purchase of securities involves greater risk than a purchase using cash resources only. If you borrow money to purchase securities, your responsibility to repay the loan and pay interest as required by its terms remains the same even if the value of the securities purchased declines.

Complaint Process and Dispute Resolution Service

We encourage you to direct any complaint (whether written or verbal) you have about Nalmont to our Chief Compliance Officer so we may have the opportunity to resolve your complaint, telling us what went wrong, when it happened, and what you expect to happen as a resolution, the whole in accordance with our Complaints Policy, a copy of which is available upon request. As part of its Complaints Policy, Nalmont has a Client dispute resolution process in place should a Client have a dispute.

We are also a member of the Ombudsman for Banking Services and Investments (**OBSI**). OBSI resolves complaints between participating firms and their clients (residing outside Québec) when they cannot come to a resolution on their own.

For Quebec Residents

1. Our Commitment

We are committed to providing our clients with the highest standard of service and maintaining your trust. If you are dissatisfied with a product, service, or experience with our firm, you have the right to make a complaint and to be treated with fairness and respect throughout the process.

2. What is a Complaint?

A complaint is any verbal or written expression of dissatisfaction regarding a product, service, or representative of Nalmont where a final response is expected. Simple requests for information or service, a request to correct a clerical error or mistake in calculation, a claim of indemnity or communication of a comment or feedback are not considered complaints unless they meet the above criteria.

3. How to File a Complaint

If you wish to file a complaint, please contact us in writing and clearly indicate that your message is a complaint. This ensures your request is handled under our official complaint processing policy.

You can submit your complaint via:

- **Email:** compliance@nalmontcapital.com
- **Mail:** 1 Carre Westmount, Suite 1405, Westmount QC, H3Z 2P9

Please include:

- Your name and contact information
- A description of your complaint
- Any relevant documents or details

4. Complaint Handling Procedure

<u>Basic Complaint Handling Process (“Basic Process”):</u>

Once your complaint is received:

- We will acknowledge receipt within 10 days, unless a simplified process (as described below) is followed.
- We will investigate your complaint and aim to provide a response with a final written decision within 60 days, or 90 days in exceptional circumstances (if additional time is required, we will inform you and explain the reasons thereof); and

- Issue a settlement offer, if applicable, within 30 days of acceptance by a complainant.

Simplified Complaint Handling Process (“Simplified Process”):

If Nalmont believes that the complaint may be resolved within 20 days, the Simplified Process may be used.

Once a complaint is received:

- We will acknowledge receipt, investigate your complaint and provide a response with a final written decision within 20 days; and
- Issue a settlement offer, if applicable, within 30 days of acceptance by a complainant.

Pursuant to the Simplified Process, we are not required to send a written acknowledgement within 10 days; however, we will send a written acknowledgement if the complaint is not resolved within the 20-day period, in which case the timelines listed under the Basic Process will be followed.

5. If You Are Not Satisfied

If you are not satisfied with our final response or if more than 60 days have passed since you submitted your complaint, you may request that your complaint file be transferred to the Autorité des marchés financiers (AMF), who offers a free dispute resolution service.

AMF’s Complaint Handling and Dispute Resolution Services

If you elect to escalate your complaint to the AMF, Nalmont will forward your file to the AMF for further investigation. You may also complete and send a Transfer Form to Nalmont that it will then forward with all relevant documentation to the AMF.

Upon receipt of your file, the AMF may:

- Offer conciliation or mediation services.
- Examine the situation as part of its supervisory activities related to the financial markets.
- Use the information shared to remind a firm or representative of its or their obligations. The AMF may also open an investigation and institute penal proceedings.

Further guidance and information related to the AMF’s complaint handling process can be found at the following link: https://lautorite.qc.ca/en/general-public/assistance-and-complaints/making-a-complaint

Contact Information – AMF:
Autorité des marchés financiers
Place de la Cité, tour Cominar
2640, boulevard Laurier, bureau 400
Québec (Québec) G1V 5C1
Phone: 1 877 525-0337
Website: https://lautorite.qc.ca/grand-public

This policy is in accordance with the Regulation respecting Complaint Processing and Dispute Resolution in the Financial Sector (CQLR c. E-6.1, r. 1.2) and applicable securities regulations.

Last Update: October 6, 2025

Conflicts of Interest Disclosure

Last Updated February 2026

A conflict of interest ("COI") can occur where the interests of a client and those of Nalmont Capital Inc. ("Nalmont" or the "Firm"), or individuals acting on Nalmont's behalf, are inconsistent or differ. Nalmont employees and individuals acting on its behalf must never allow themselves to be placed in a position where their personal interests are in conflict (or could be a potential conflict) with the interests or business of the client. In general, Nalmont manages conflicts in one or more of the following ways:

- ***Avoid:** avoid the COI;*
- ***Control:** controlling the COI by determining if intra-firm adjustments, policies and procedures and controls can be implemented; or*
- ***Disclosure:** disclosing the COI to all interested parties that may affect the service Nalmont provides prior to any decision being made that affects the interested party.*

Below is a list of potential material COIs and the primary methods we use to manage them. COIs that cannot be effectively managed in the best interests of the client will be avoided.

Potential Conflict of Interest	Details	How is the Conflict Managed	How We Address
Affiliated Firms and Related Registrants Providing Other Products or Services	A related registrant means a securities registrant for which Nalmont's principal shareholders, officers, partners or directors act as shareholders, officers, partners or directors (a **Related Registrant**). Entities registered with securities regulators or SROs in foreign jurisdictions will be included as Related Registrants for the purposes of the present Register. The Firm was founded in a partnership with LFIS Capital (**LFIS Capital**), headquartered in Paris, France, Walter Global Asset Management Inc. (**WGAM**) and Nalmont's Managing Partners. Founded in 2012, LFIS Capital is an investment management firm with a quantitative DNA and a derivative expertise focused on alternative asset classes and structured solutions. WGAM is the manager for the WGAM Strategic Partnership Fund L.P. (**WGAM Fund**). The WGAM Fund is a private equity fund which has taken ownership positions in organizations related to the asset management industry (each a **Portfolio Partner**). WGAM is a member of the Walter Group Inc. (the **Walter Group**), a diversified investment holding company based in Westmount, Quebec. The Walter group of companies consists of an ecosystem of businesses comprising a core portfolio	Disclosure/ Control	Nalmont discloses this material conflict of interest (**COI**) to each Client at the time of account opening via its *Conflicts of Interest Disclosure* contained within the *Relationship Disclosure Information* (**RDI**). Nalmont may, as part of its business activities, use the services offered by a related registered entity. Should Nalmont decide to do so, it will be done in accordance with applicable securities legislation and in your best interests. When transacting with affiliates, the Firm will ensure that the terms and conditions governing these transactions are comparable to those offered by unrelated parties. Nalmont initially intends to use the proprietary portfolio management system (**PMS**) developed by LFIS Capital, as well as other administrative services (i.e., back office etc.) offered by LFIS Capital. It is important to note that the use of the PMS as well as any other administrative services by Nalmont will be carried out in accordance with Nalmont's obligations relating to the protection of personal information and its cyber security system. More specifically, if and when Nalmont utilizes the proprietary products developed by LFIS Capital, it will manage any potential conflicts of interest by: • clearly disclosing to Clients the fact that Nalmont is a partner of LFIS Capital; • obtaining consent to the purchase of proprietary/ related products; • ensuring that the purchase of the proprietary/ related products is suitable and places the client's interests first;

Potential Conflict of Interest	Details	How is the Conflict Managed	How We Address
	of public investments managed by Walter Public Investments Inc. and private assets that are managed by three private equity teams: Walter Capital Partners Inc., Walter Global Asset Management Inc. and Walter Ventures S.L. As of the date hereof, please refer to Appendix A for a list of the Portfolio Partners – each is a Related Registrant of Nalmont as WGAM is the manager of the WGAM Fund.		• conducting ongoing oversight of the quality of services provided; and • regularly updating and testing models to ensure they are adapting to evolving market and technological conditions. Nalmont and each Related Registrant adhere to applicable securities legislation as well as their own internal policies and procedures (i.e., each Related Registrant has its own conflict of interest policies, codes of conduct and ethics governing their actions and compliance with applicable securities legislation and internal policies and procedures). Compliance with both internal and external regulations, policies and procedures is monitored at all levels of Nalmont under the guidance of the CCO. Nalmont has adopted certain policies to minimize the occurrence of such conflicts or to deal fairly where those conflicts cannot be avoided. In no case will Nalmont put its own interests ahead of those of its Clients. If a conflict of interest is sufficiently contrary to the interests of a Client and Nalmont controls such conflict by way of disclosure, Nalmont will avoid such conflict.
Related Issuers, Connected Issuers and Proprietary Products	Nalmont, in its capacity as investment fund manager and portfolio manager, may from time to time launch proprietary funds. Such funds may be recommended to EMD Clients, or may be purchased in the account of a PM Client as part of the overall investment strategy. An issuer may be considered a “Related Issuer” of Nalmont if the issuer owns 20% or more of the voting securities of Nalmont, or if Nalmont owns 20% or more of the voting securities of the issuer, or the same third party owns 20% or more of the voting securities of Nalmont and the issuer. An issuer may be considered to be a “Connected Issuer” of Nalmont if it has a relationship with Nalmont or its affiliated parties, or the directors, officers or partners of such parties, that may lead a reasonable prospective purchaser to question if the issuer and such parties are independent.	Disclosure/ Control	Nalmont will disclose, via its *Conflicts of Interest Disclosure* and RDI, the nature and extent of its relationship with the issuer of the securities. The Firm has and will continue to take steps to ensure that it and its Registered Individuals always act in the best interests of their Clients. For example: • Nalmont will obtain the consent of each client to the purchase of a related/connected issuer/ proprietary product; • Nalmont will only make recommendations/ investments that are suitable for the client and place their interests first; • all investment decisions relating to buying, selling and/or holding securities for a Client will be made in the ordinary course in accordance with market conditions; • decisions on behalf of a Client will be made in the best interests of Clients uninfluenced by any other considerations; • any conflicts of interest that arise will be appropriately reported to the CCO as noted. Please refer to Appendix A for a list of Issuers that are “Related Issuers” or “Connected Issuers” of Nalmont by virtue of the ownership of equity interests, directly or indirectly, by WGAM Fund.

Potential Conflict of Interest	Details	How is the Conflict Managed	How We Address
			Nalmont's CCO is responsible for proper documentation of its KYP obligations on an ongoing basis.
Sub-advisory Engagements	Nalmont will enter into sub-advisory engagements wherein Nalmont will sub-advise and provide portfolio management services to third party investment funds. These sub-advisory engagements may create conflicts as between these engagements and as between these engagements and direct clients of Nalmont as it relates to allocation of investment opportunities.	Control/ Disclosure	Nalmont has enacted policies and procedures to ensure a fair allocation of investment opportunities across all of its mandates whether sub-advisory in nature or direct engagement mandates, which will provide for a pro rata allocation of investment opportunities.
Shared Resources	In order to benefit from economies of scale and to generate benefits for our clients, Nalmont may share resources with LFIS Capital.	Disclosure/ Control	As of the date hereof, Nalmont may from time to time rely on certain services provided by LFIS Capital. As a result of using such services, Nalmont will disclose the same to its clients, as necessary. Nalmont will ensure that it respects its obligation to act in its Clients' best interests when selecting all service providers. In addition, all client information will remain confidential and will not be shared with related entities even when resources are shared.
Referral Arrangements	Paid referral arrangements are inherent conflicts of interest which are almost always material, whereas registered firms must document their oversight of all such arrangements. Nalmont does not actively seek out referral arrangements. However, from time to time, Nalmont may enter into referral arrangements where another party refers clients to us or where we refer clients to a third party for a fee.	Avoidance/ Disclosure	Nalmont does not currently have any referral arrangements; however, Nalmont has developed policies and procedures for controlling this material conflict of interest if the Firm decides to engage in referral arrangements in the future, which is disclosed to Clients. In order to mitigate any actual or potential conflicts, Nalmont will bring the referral relationship and the terms of that referral relationship to its Clients' attention in accordance with NI 31-103. The CCO, or their designate, will be responsible for monitoring and supervising Nalmont's Referral Arrangements.
Outside Activities (OA)	Conflicts can arise when Registered Individuals, Officers, Permitted Individuals of Nalmont are involved in OA, for example, because of the compensation they receive for these activities or because of the nature of the relationship between the individual and the outside entity (including Related Registrants). An individual's involvement in an OA may be perceived as a potential conflict of interest as it relates to: • compensation for the outside activity;	Disclosure/ Control	Nalmont's Registered Individuals, Permitted Individuals, Officers and Employees must disclose all OAs. All OAs must be pre-approved by the CCO and are monitored by the CCO or designate on an ongoing basis. Before the CCO approves an OA, the CCO shall consider potential conflicts of interest arising from involvement in the outside activity. If Nalmont cannot properly control a potential conflict of interest in the best interest of its clients, such individual will be prohibited from engaging in the OA. The Shareholders and Directors, who are not employees of the Firm, are exempt from the requirement to obtain the CCO's pre-approval of their OA engagement, provided that such OA relates to the

Potential Conflict of Interest	Details	How is the Conflict Managed	How We Address
	• the nature of the relationship between the individual and the outside entity; • possible confusion arising from the Client's view that the OA is part of Nalmont's activities; • possible confusion of confidential information between the outside entity and Nalmont; • business competition between the outside company and Nalmont; • a position of influence; • familiarity of the employee of Nalmont with his/her duties for the outside company; and • excessive demand on time and attention of the employee of Nalmont.		Walter Group of Companies' business details whereby certain Shareholders and Directors of the Firm may be a shareholder or director of certain acquisition companies.
Directorships	A director position at another registered firm, at an unregistered firm or at a reporting issuer or an issuer held by a Registered Individual, Permitted Individual and/or an Employee, where the person has access to confidential or market sensitive information ("Access Person"), is an example of an outside activity that can be considered a material conflict of interest. In such a situation, the person will have a duty to keep such information confidential and to not use the information for his or her personal benefit or other parties.	Disclosure/ Control	Any individual acting on behalf of the Firm is not permitted to accept or engage in any outside directorships or serve on any board of directors of any companies or other organizations without the prior written consent of the CCO. This includes directorships in "for profit" organizations as well as "non-profit" organizations such as charities, political associations or societies. When considering an outside directorship role, individuals must ensure such directorship appointment is not, and cannot be, perceived as presenting a conflict of interest with their relationship with the Firm. All requests for approval must be done in writing which includes a brief description of what the company or organization does and whether those activities involve or impact the Firm, its business activities or its Clients in any way.
Internal Compensation Arrangements and Incentive Practices	It is a material conflict of interest for the Firm to create incentives to sell or recommend certain products or services over others and for its Registered Individuals to receive greater compensation from the Firm for the recommendation of certain securities or strategies over others.	Control/ Disclosure	In order to control such conflicts, the Firm: • maintains internal compensation arrangements for Registered Individuals that do not solely tie the Registered Individual's compensation, either directly or indirectly, to commission revenue that is based on Referral Fees; • in the event the Firm recommends third-party products in which it receives compensation, the CCO will monitor recommendations to determine whether predominance is given to securities/ derivatives that provide third-party compensation or higher third-party compensation, and to assist in evaluating whether the conflict is being addressed in the best interest of the Client; • prescribed that the major portion of the remuneration of the CCO is based on salary and is not tied to sales or revenue.

Potential Conflict of Interest	Details	How is the Conflict Managed	How We Address
Third Party Compensation	It is an inherent conflict of interest for Nalmont to receive third-party compensation as it creates a potential incentive to choose products that include such compensation when purchasing or recommending securities to/for clients. Third party products are not offered at this time.	Disclosure/ Avoidance	Nalmont avoids the use of third-party products that pay compensation, wherever possible, and as a general rule. In the event the Firm recommends third-party products in which it receives compensation, the CCO will monitor recommendations to determine whether predominance is given to securities/ derivatives that provide third-party compensation or higher third-party compensation, and to assist in evaluating whether the conflict is being addressed in the best interest of the client.
Dual Registration and Dual Employment	Registered Individuals, Permitted Individuals and/or Employees of the Firm may also be dually employed with other non-registered entities that are affiliated with the Firm.	Disclosure/ Avoidance	The CCO is responsible for reviewing, assessing and approving such engagements and any individuals who engage in such activities will adhere to applicable securities laws and disclosures (i.e., reporting the same as an OA). Pursuant to section 4.1 of NI 31-103, the Firm must not permit an individual to act as a dealing, advising or associate advising representative of the registered firm if either of the following apply: (a) the individual acts as an officer, partner or director of another firm registered in any jurisdiction of Canada that is not an affiliate of the first-mentioned registered firm; (b) the individual is registered as a dealing, advising or associate advising representative of another firm registered in any jurisdiction of Canada.
Marketing with Misleading or Inaccurate Performance	Nalmont has an interest in showing positive performance to attract more clients which could potentially conflict with Nalmont's fiduciary responsibility to its clients and prospective clients to provide accurate performance reporting.	Control/ Disclosure	Nalmont ensures that promotional and marketing materials are factually accurate and free from material omissions. In addition, Nalmont's CCO reviews any marketing material and signs off prior to any dissemination.
Fee Dispersion	Where a client is charged more than other clients for the same or substantially similar products or services, there could be a breach of the registrant's duty to treat clients fairly, honestly and in good faith.	Control/ Disclosure	Regardless of client AUM or fee structure, each client is treated in a consistent manner. All fee arrangements that are specific to clients are disclosed in the IMA or Sub-Advisory Agreement. All fees and charges are disclosed in the Fee Schedule at time of account opening. Annual fees and operating charges paid each calendar year are reported via annual reports.
Valuation of Portfolios/ Funds	As Nalmont's revenue is based on a percentage of the market value of each Client's account or fund that it manages, Nalmont may have a conflict of interest in those instances where Nalmont is responsible for valuing portfolio securities. Valuation impacts the fees earned by the Firm and the performance reported to Clients as well as marketed.	Avoidance/ Control	Individual securities held in client segregated accounts are valued on a daily basis using market prices, foreign exchange rates and forward exchange rates obtained from independent sources. In the case of both equities and bonds, prices are sourced from independent third-party sources and loaded directly into our portfolio management system (**PMS**).

Potential Conflict of Interest	Details	How is the Conflict Managed	How We Address
Fair Allocation of Investments	There can be competing interests among clients, and a registrant may have difficulty trying to address these conflicts in the best interest of all their clients simultaneously.	Disclosure/ Control	The Firm may manage various portfolios and may enter into various sub-advisory arrangements. All trades will be allocated on a fair and equitable basis among the Firm's Clients.
Trading and Pricing Errors	Nalmont may have a potential conflict of interest when determining when, and how, to deal with a pricing error. The risk is that Nalmont may not take steps to correct or otherwise address the error due to the cost or other implications to Nalmont.	Disclosure/ Control	The Firm will receive a report from the custodian on a daily basis. The Firm will identify any trades that have failed. Trade, payment and record keeping errors in Client accounts will be handled in accordance with the following principles: • the Firm will act in a timely manner when an error is detected to ensure Clients are treated fairly; • the Firm will assign an individual within the Firm who will be responsible for investigating the error by confirming the trade information and contacting the corresponding settlement agent; • the Firm is responsible for reviewing the results of such investigations and approving (in writing) any payment or other compensation to be made to a Client; • all investigations, review and approvals for payment of compensation will be documented in writing and maintained by the Firm for a period of no less than seven (7) years; and • the UDP will review errors or pattern of errors to determine whether the procedures and processes that have been adopted by the Firm need to be amended to avoid or minimize the reoccurrence of such errors.
Tied Selling	It is an inherent conflict of interest where purchase of one service is conditional on buying another as well, which is prohibited by securities laws.	Disclosure/ Avoidance	Nalmont prohibits tied selling.
Purchasing Assets from Clients Outside the Normal Course of Business	The purchase of an asset from a client outside of the normal course of Nalmont's business may create a material conflict of interest.	Avoidance	Nalmont directors, officers and employees are prohibited from purchasing or selling securities or assets of any type (including property) from clients outside the normal course of a registrant's business. Managed accounts and sub-advised accounts are prohibited from purchasing or selling to a "responsible person" (as defined under securities laws).

Potential Conflict of Interest	Details	How is the Conflict Managed	How We Address
Soft Dollars	Soft dollar arrangements occur when brokers have agreed to provide other services (relating to research and trade execution) at no cost to the Firm in exchange for brokerage business from the Firm's managed accounts. Although the brokers involved in soft dollar arrangements do not necessarily charge the lowest brokerage commissions, the Firm will nonetheless enter into such arrangements when it is of the view that such brokers provide best execution and/or the value of the research and other services exceeds any incremental commission costs. The Firm may enter into soft dollar arrangements in accordance with industry standards when it is of the view that such arrangements are for the benefit of its clients; however, not all soft dollar arrangements will benefit all clients at all times.	Control/ Disclosure	The Firm has policies and procedures in place with respect to the selection of brokers and the utilization of soft dollars to ensure, to the extent they are received, that they are used in the best interests of clients.
Gifts & Entertainment	The giving or receiving of gifts or covering entertainment costs to or from brokers and service providers could create a conflict of interest through the appearance of purchasing influence.	Control/ Disclosure	Individuals acting on behalf of the Firm and members of their immediate families are prohibited from directly or indirectly accepting or receiving bonuses, fees, commissions, excessive gifts or gratuities, excessive entertainment or any other similar form of consideration, from any person, business or association with which the Firm does or seeks to do business. The Firm maintains prescribed limits which are monitored by the CCO.
Full Control or Authority Over Financial Affairs of Clients	Having full control or authority over the financial affairs of a Client is an inherent conflict of interest.	Avoidance	Having full control or authority over the financial affairs of a client is an inherent conflict of interest, where the conflict should be avoided unless a firm can clearly demonstrate that the appointment is in the client's best interests. Nalmont prohibits the practice of having full control or authority over the financial affairs of any clients.
Employees/ Access Persons Could Benefit from Trading with Knowledge of Portfolio Transactions for Clients (e.g., front running a trade)	Individuals may find themselves in situations where their personal interests are in conflict with those of a Client or account in which it acts as a Sub-Advisor. When individuals at Nalmont invest in the same securities or products as Clients of Nalmont or accounts in which it has trading authority, there is a perceived or potential conflict of interest that such individuals at Nalmont may benefit from opportunities at the expense of Nalmont's Clients or accounts in which it has trading authority as a Sub-Advisor.	Avoidance/ Control	Any individual working for or acting on behalf of Nalmont who has access to non-public information concerning portfolio holdings, trading activities, trading strategies, investment decisions or the ongoing investment programs at Nalmont are required to comply with an Access Persons & Personal Trading Policy. The CCO or designate reviews employee personal trading on a regular basis. The Firm's policy is that employees are not permitted to engage in personal trading in the same markets that the Firm trades. The Firm has managed this conflict in the best interests of its clients by maintaining its policies and procedures.

Appendix A

List of Portfolio Partners of WGAM Fund

- LionGuard Capital Management Inc.
- Validus Risk Management Ltd.
- LFIS Capital
- Quadra Capital Partners LLP
- Auspice Capital Advisors Ltd.
- Kilgour Williams Capital Inc.
- Bonnefield Financial Inc.
- Samara Financial Group Inc.
- Innocap Investment Management
- Madryn Asset Management, LP
- Saranac Partners
- Brightspark Capital Inc.
- Brio Platform
- Nalmont Capital Inc.

List of Related Issuers or Connected Issuers

- WGAM Strategic Partnership Fund L.P.