

CLIENT DISCLOSURE

1. Investor Information

Applicant Name	Social Insurance Number (Optional – For Identification)		
Co-Applicant Name	Social Insurance Number (Optional – For Identification)		
Co-Applicant Name	Social Insurance Number (Optional – For Identification)		

Address (Single address for all account holders or for an individual account holder)

2. Mutual Fund Dealers Association of Canada Client Complaint Information

Clients of a mutual fund dealer who are not satisfied with a financial product or service have a right to make a complaint and to seek resolution of the problem. MFDA Member dealers have a responsibility to their clients to ensure that all complaints are dealt with fairly and promptly. If you have a complaint, these are some of the steps you can take:

Contact your Mutual Fund Dealer:

Member firms are responsible to you, the investor, for monitoring the actions of their representatives to ensure that they are in compliance with by-laws, rules and policies governing their activities. The firm will investigate any complaint that you initiate and respond back to you with the results of their investigation within the time period expected of a Member acting diligently in the circumstances, in most cases within three months of receipt of the complaint. It is helpful if your complaint is in writing.

Contact the Mutual Fund Dealers Association of Canada ("MFDA"):

MFDA is a self-regulatory organization in Canada to which your Mutual Fund Dealer belongs. The MFDA investigates complaints about Mutual Fund Dealers and their representatives and takes enforcement action where appropriate. You may make a complaint to the MFDA at any time, whether or not you have complained to your Mutual Fund Dealer. The MFDA can be contacted:

- By completing the on-line complaint form at <u>www.mfda.ca</u>
- By telephone in Toronto at (416) 361-6332 or toll free at 1-888-466-6332
- By e-mail¹ at <u>complaints@mfda.ca</u>
- In writing by mail to 121 King Street West, Suite1000, Toronto, ON M5H 3T9 or by fax at (416) 361-9073

Compensation:

The MFDA does not order compensation or restitution to clients of Members. The MFDA exists to regulate the operations, standards of practice and business conduct of its Members and their representatives with a mandate to enhance investor protection and strengthen public confidence in the Canadian Mutual Fund industry. If you are seeking compensation, you may consider the following:

Ombudsman for Banking Services and Investments ("OBSI"):

- You may make a complaint to OBSI after you have complained to the dealer, at either of the following times:
- If the dealer's Compliance Department has not responded to your complaint within 90 days of the date you complained, or;
- After the dealer's Compliance Department has responded to your complaint and you are not satisfied with the response. Please note that you have 180 calendar days to bring your complaint to OBSI after receiving the dealer's response.
- OBSI provides an independent and impartial process for the investigation and resolution of complaints about the
 provision of financial services to clients. OBSI can make a non-binding recommendation that your firm compensate
 you (up to \$350,000) if it determines that you have been treated unfairly, taking into account the criteria of good
 financial services and business practice, relevant codes of practice or conduct, industry regulation and the law. The
 OBSI process is free of charge and is confidential. OBSI can be contacted:
- By telephone in Toronto at (416) 287-2877, or toll free at 1-888-451-4519
- By e-mail at ombudsman@obsi.ca

¹ Clients who choose to communicate by e-mail should be aware of possible confidentiality issues regarding internet communications.

Legal Assistance:

You may consider retaining a lawyer to assist with the complaint. You should be aware that there are legal time limits for taking civil action. A lawyer can advise you of your options and resources. Once the applicable limitation period expires, you may lose rights to pursue some claims.

Manitoba, New Brunswick and Saskatchewan:

Securities regulatory authorities in these provinces have the power to, in appropriate cases, order that a person or company that has contravened securities laws in their province pay compensation to a claimant. The claimant is then able to enforce such an order as if it were a judgment of the superior court in that province. For more information, please visit: Manitoba: www.msc.gov.mb.ca

New Brunswick: <u>www.nbsc-cvmnb.ca</u> Saskatchewan: <u>www.fcaa.gov.sk.ca</u>

Québec:

- If you are not satisfied with the outcome or with the examination of a complaint, the Autorité des marchés financiers ("AMF") can examine your complaint and may provide dispute resolution services.
- If you think you are a victim of fraud, fraudulent tactics or embezzlement, you can contact the AMF to see if you meet the eligibility to submit a claim to the Fonds d'indemnisation des services financiers ("Financial Services Compensation Fund"). An indemnity up to \$200,000 can be payable through monies accumulated in the fund for an eligible claim.

For more information:

- 1. Contact the AMF by telephone at (418) 525-0337 (in Québec) or toll free at 1-877-525-0337
- 2. Visit <u>www.lautorite.qc.ca</u>

3. Summary of 3i Financial Investment Services Inc. Complaint Handling Procedures

3i Financial Investment Services Inc. has procedures in place to handle any written or verbal complaints received from clients in a fair and prompt manner. This is a summary of those procedures, which we provide to new clients, clients who have filed a complaint and that we also make available on our website at <u>www.3ifinancial.com</u>.

The Client Complaint Information Form

We also provide new clients and clients who complain with separate information [or "a separate document"] called the Client Complaint Information Form ("CCIF") that provides general information about their options for making a complaint.

How to File a Complaint with 3i Financial Investment Services Inc. (3iFIS)

Clients wishing to complain to 3iFIS may make their complaint to our head office by contacting: 9040 Leslie Street, Suite 221, Richmond Hill, Ontario, L4B 3M4 - Compliance Department. All complaints are forwarded to qualified compliance or supervisory personnel to be handled. We encourage clients to make their complaint in writing or by e-mail² where possible. Where clients have difficulty putting their complaint in writing, they should advise us, so we can provide assistance. For confidentiality reasons, we will only deal with the client or another individual who has the client's express written authorization to deal with us.

Complaint Handling Procedures

We will acknowledge receipt of complaints promptly, generally within five days. We review all complaints fairly, taking into account all relevant documents and statements obtained from the client, our records, our financial advisor, other staff members and any other relevant source. Once our review is complete, we provide clients with our response, which will be in writing if the complaint was made in writing. Our response may be an offer to resolve your complaint, a denial of the complaint with reasons or another appropriate response. Where the complaint relates to certain serious allegations³, our initial acknowledgment will include copies of this summary and the CCIF. Our response will summarize your complaint, our findings, will contain a reminder about your options with the Ombudsman for Banking Services and Investments, and a copy of the CCIF.

We will generally provide our response within ninety days, unless we are waiting for additional information from you, or the case is novel or very complicated. We will respond to communications you send us after the date of our response to the extent necessary to implement a resolution or to address any new issues or information you provide.

Settlements

If we offer you a financial settlement, we may ask you to sign a release and waiver for legal reasons.

Contacting 3i Financial Investment Services Inc.:

Clients may contact us at any time to provide further information or to inquire as to the status of their complaint by contacting the individual handling their complaint or by contacting Compliance Department - 9040 Leslie Street, Suite 221, Richmond Hill, Ontario, L4B 3M4.

² Clients who choose to communicate by e-mail should be aware of possible confidentiality issues regarding internet communications.

³ Theft, fraud, misappropriation of funds or securities, forgery, money laundering, market manipulation, insider trading, misrepresentation, or unauthorized trading.

Here are some risks and factors that you should consider before borrowing to invest:

Is it Right for You?

Borrowing money to invest is risky. You should only consider borrowing to invest if:

- You are comfortable with taking risk.
- You are comfortable taking on debt to buy investments that may go up or down in value.
- You are investing for the long-term.
- You have a stable income.

You Should Not Borrow to Invest If:

- You have a low tolerance for risk.
- You are investing for a short period of time.
- You intend to rely on income from the investments to pay living expenses.
- You intend to rely on income from the investments to repay the loan. If this income stops or decreases you may not be able to pay back the loan.

You Can End Up Losing Money

- If the investments go down in value and you have borrowed money, your losses would be larger than had you invested using your own money.
- Whether your investments make money or not you will still have to pay back the loan plus interest. You may have to sell other assets or use money you had set aside for other purposes to pay back the loan.
- If you used your home as security for the loan, you may lose your home.
- If the investments go up in value, you may still not make enough money to cover the costs of borrowing.

Tax Considerations

- You should not borrow to invest just to receive a tax deduction.
- Interest costs are not always tax deductible. You may not be entitled to a tax deduction and may be reassessed for past deductions. You may want to consult a tax professional to determine whether your interest costs will be deductible before borrowing to invest. Your advisor should discuss with you the risks of borrowing to invest.

5. Financial Resources Required for Investments Purchased With Borrowed Funds

It is also important that the investor be aware of the terms of a loan secured by securities. The lender may require that the amount outstanding on the loan not rise above an agreed percentage of the market value of the securities. Should this occur, the borrower must pay down the loan or sell the securities so as to return the loan to the agreed percentage. In our example above, the lender may require that the loan not exceed 75% of the market value of the mutual fund units. On a decline of value of the units to \$90,000 the borrower must reduce the loan to \$67,500 (75% of \$90,000). If the borrower does not have cash available, the borrower must sell units at a loss to provide money to reduce the loan. Money is, of course, also required to pay interest on the loan. Under these circumstances, investors who use borrowed funds to purchase their investment are advised to have adequate financial resources available both to pay interest and also to reduce the loan if the borrowing arrangements require such a payment.

6. Financial Advisor Compensation Disclosure

Mutual fund companies compensate 3iFIS, who in turn compensates your Financial Advisor by paying commissions and/or an on-going service fee (trailer commissions).

7. Dealer Compensation Disclosure

Commissions are compensated to authorize distributors of mutual fund products in the following way:

- **Front-Load Funds** Funds that are purchased on a sales charge basis (front-end load) requires the sales commission to be deducted from the amount of the purchase order. The net amount of the investment is then invested in securities of the fund at the net asset value.
- **Deferred-Load Funds** Funds that are purchased without an initial sales charge (back-end load) requires no deduction from the amount of your purchase order at the time of purchase, but your investment may be subject to a redemption charge when all or a portion of the securities is redeemed prior to the expiry of a set schedule.
- Service Fees (Trailer Commissions) Generally, a mutual fund company pays a dealer service fees or trailer commissions as long as you, the client, maintain your investment in the fund with your dealer. Services fees encourage the dealer to provide on-going services to the clients after the date of purchase, for which no sales commission would otherwise be received. Some mutual fund companies do not pay service fees to dealers.
- Fee-Based Compensation There are no sales charges when purchasing or selling a fund, nor trailing commissions with these accounts. Instead, there is an annual compensation that is based on a percentage of the value of your account. This percentage is negotiated between you and your financial advisor.
- Other Sales Incentives Many mutual fund companies also provide additional sales incentives or compensations to

dealers to promote the distribution of their mutual fund. Sales incentives may include marketing support programs providing for reimbursement of advertising or promotional expenses incurred in the solicitation of fund sales; sales conferences and educational programs held. All sales incentives are subject to review by 3iFIS and must comply with the requirements of our Standard of Practice (Mutual Fund Section of PPM) and the Rules of the MFDA.

8. Client Relationship Disclosure

Nature of the Advisory Relationship

You will have an advisory account relationship with 3i Financial Investment Services Inc. In an advisory account relationship, the Approved Person is responsible to give you unbiased advice and recommendations that is suitable based on your investment needs and objectives. However, you are responsible for making all investment decisions in your account(s) and must authorize each transaction, but you can rely on the advice given by the Approved Person.

Products and Services

3iFIS offers the following products: mutual funds and ETFs.

Nature of the Products and Services Offered

An advisory account may be commission-based or fee-based. Fee-based accounts may be administered by 3i Financial Investment Services Inc., or fund companies and intermediaries.

Intermediary Accounts

3iFIS has entered into an arrangement with B2B Bank, another member of the MFDA. These accounts are held and administered by an intermediary company (B2B Bank) and they will be responsible for trade execution and settlement. 3IFIS will be responsible for determining the suitability of, and ensuring appropriate supervision is performed for all trading activity in a B2B Bank account.

Handling of Cash and Cheques

3iFIS and its Approved Persons (Financial Advisors) do not accept cash for the purchases of securities through any of our industry partners.

Suitability of Orders Accepted/Recommendations Made

- 3iFIS is required under securities legislation and MFDA rules to ensure each recommendation made is suitable for the client in relations to the client's investment objectives, risk tolerance and other personal circumstances.
- The obligation to make a suitability determination applies to trades proposed by the client, whether or not a recommendation is made.
- 3iFIS will also assess the suitability of investments in the client's account when the client transfers assets into an
 account at 3iFIS or its Approved Persons become aware of a material change in client information or when there is a
 change in the Approved Person responsible for the client's account at 3iFIS.

9. Account Reporting

3iFIS will send out account statements on a quarterly basis and the CRM2 reports annually. Trade confirmations will be sent promptly after the settlement of the transaction by the issuer.

Quarterly Account Statements

The account statements will include information such as client information, your advisor information, and summary of plans; details about the activity in your account(s) since your last statement which includes the holdings and history of transactions that are consisted of deposits, charges, withdrawals for the given period; the name, quantity, market value and total market value for each investment position in the account; the name, quantity, price and total value of each purchase, sale or transfer and the date of each transaction; any cash balance in the account; the book cost of all investment positions in the account; and a description of how the investments in the account are held.

Annual CRM2 Account Performance Report

3i Financial Investment Services Inc. will include in your December 31st statement, an "Annual Performance of this account" report. Information in this report will include annualized total percentage rate of return in your account using the internal rate of return (RoR), a money-weighted methodology.

Annual CRM2 Charges and Commissions Report

3i Financial Investment Services Inc. will include in your December 31st statement an "Annual Charges and Commissions for this Account" report. The report outlines the compensation 3i Financial Investment Services Inc. received and shared with your advisor for the services and products provided to you. This compensation comes from two sources, namely, "Account Charges", which are fees paid directly by you and relate to servicing your account and include transaction charges; and Commissions Paid to 3i Financial Investment Services Inc. which are the commissions we receive from third parties such as fund companies for instance.

Investment Objectives

- **Safety** Your objective is preservation of capital and you are less concerned with capital appreciation. Investments that will satisfy this objective include Guaranteed Investment Certificates (GIC), high interest saving accounts and money market instruments.
- **Income** Your objective is to generate current income from your investments and you are less concerned with capital appreciation. Investments that will satisfy this objective include fixed income investments such as mutual funds that invest in bond or money market instruments.
- **Balanced** Your objective is a combination of income and growth. An account with a balanced objective should typically include at least 40% in fixed income investments and no more than 60% in equities.
- **Growth** Your objective is capital appreciation and current income from investments is not a requirement. You may have a higher risk tolerance and a longer-term time horizon. This may lead you to hold a relatively high proportion of funds that invest in equities.
- **Speculation** Your objective is capital appreciation and current income from investments is not a requirement. Capital that is needed should not be used for speculation.

Risk Tolerance

- Low Low risk investments demonstrate a low volatility and are for investors who are willing to accept lower returns for a greater safety of capital and may include Guaranteed Investment Certificates (GIC) or money market mutual funds.
- Low to Medium Low to medium risk investments demonstrate a low to medium volatility but a higher volatility than those described above and may include bond or balanced mutual funds.
- **Medium** Medium risk investments demonstrate a medium volatility and are for investors who are looking for moderate growth over a longer period of time and may include Canadian dividend, Canadian equity, US equity and certain international equity mutual funds.
- **Medium to High** Medium to high-risk investments demonstrate a medium to high volatility and are for investors who are looking for long-term growth and may include mutual funds that invest in smaller companies, specific market sectors or geographic areas.
- High High risk investments demonstrate a high volatility and are for investors who are growth-oriented and are
 willing to except significant short-term fluctuations in portfolio value in exchange for potentially higher and a long-term
 return. It may include labour sponsored venture capital funds or funds that invest in specific market sectors or
 geographic areas such as emerging markets, science and technology or funds that engage in any speculative trading
 strategies including hedge funds that invest in derivatives, short sell or use leverage.

Knowledge of Investments

- Novice Little knowledge of investments and new to investing.
- *Fair* Some knowledge of investments.
- Good Good knowledge of investments.
- Sophisticated Extensive knowledge of investments and have used many types of products.

Time Horizon

Please indicate the period from now to when you will need to access a significant portion of the money you invest in this account.

Annual Income

Please indicate the approximate income from all sources.

Net Worth

Please provide an estimate of the value of your assets and liabilities.

11. Privacy Information

Various Canadian laws govern the collection, use, and disclosure of personal information. Please be advised that:

- When you deal with us, we collect and record personal information about you. Only 3i Financial Investment Services Inc (3iFIS) employees and certain agents of our, who need access to this information in carrying out their duties have access to this information. We use this personal information, including that recorded during telephone calls, to:
- Professionally serve your investing needs and ensure quality control.
- Properly identify you and establish and maintain your account with us.
- Develop and offer additional products and services that we feel may be of interest to you; and
- Meet other legal and regulatory requirements.
- 2. We may, from time to time, contact third parties (for example financial institutions) who keep personal information about you in order to gather information necessary to properly service your account. We may share your personal information with third party business suppliers solely in order to permit them to carry out duties that we have given them (for example, third party statement provided by the client in order to process the transfer).

- 3. To ensure you benefit from a full range of products and services we may, from time to time, share with our affiliates or any of our subsidiaries (collectively the "Affiliates") your personal information.
- 4. 3iFIS only collects, uses, and discloses your personal information for a legitimate bona fide business and legal reasons. We otherwise do not disclose your personal information except where required by law.
- 5. By signing the Client Disclosure, I authorize the collection and use of my personal information and consent to this information being kept as long as 3iFIS has a need for it for the purposes described above.

12. Outside Activities

As a Financial Advisor licensed with 3i Financial Investment Services Inc (3iFIS), it is my responsibility to provide my client(s) with full and fair disclosure on the type of service(s) that I can provide and through which company that I provide these service(s) through. This will provide the client(s) with the necessary information before utilizing my service(s).

Name		Is a Financial Advisor of 3iFIS, who also provided the following product(s) / services(s):	
Type of Service	through	Name of Company	
Type of Service	through	Name of Company	
Type of Service	through	Name of Company	
Type of Service	through	Name of Company	
Type of Service	through	Name of Company	

Any outside activities relating to these service(s) are not the business of 3iFIS and are not supervised by 3iFIS. 3iFIS is not responsible for such activities. 3iFIS is a member of the Mutual Fund Dealers Association (MFDA) licensed to distribute mutual funds in the province of Ontario, Canada.

Applicant Name (Please Print)	Applicant Signature	Date (YYYY-MMM-DD)
Co-Applicant Name (Please Print)	Co-Applicant Signature	Date (YYYY-MMM-DD)
Advisor Name (Please Print)	Advisor Signature	Date (YYYY-MMM-DD)
7844 ON		

Dealer Representative Code