

ALTIMUM MUTUALS INC.

94 Barbican Trail, St. Catharines, Ontario L2T 4A8

Compliance Policies and Procedures Manual

Revised April 2020

The Mutual Fund Policies and Procedures Manual is designed to give every Altimum Mutuals Inc. Approved Person the necessary information to solicit, process and service mutual funds. It is a responsibility that must be taken seriously. It is impossible for this manual to answer every question. However, it does cover the areas you are most likely to encounter. It is designed to be used by those who are already approved for the sale of mutual funds. You should be familiar with the contents of the manual before you begin the sale of mutual funds.

For any questions you may have which are not directly answered within the contents of this Manual, contact the Chief Compliance Officer (CCO) at Head Office.

New Approved Persons are required to be familiar with the contents of this manual before commencing with the sale of mutual funds.

Familiarity with the contents of this Manual must be documented in writing by completing the Acknowledgment and Certification being the next page of this Manual.

You must not sign the Acknowledgment and Certification on the next page of this manual before reading the manual and until you have had all questions answered to your satisfaction.

ACKNOWLEDGEMENT AND CERTIFICATION
RECEIPT OF MANUAL
MFDA RULES, MFDA POLICIES, N1 81-102, N1 81-105 CP

According to Section 2, 10 of the MFDA Rules:

“Every Member shall establish and maintain written policies and procedures (that have been approved by senior management of the Member) for dealing with clients and ensuring compliance with the Rules, By-Laws and Policies of the Corporations and applicable securities legislation.’

All registered Representatives and employees are required to sign this receipt stating they have received this Manual, read and accepted its contents, and that he or she will abide by the policies and procedures as outlined.

I have received and read the Altimum Mutuals Inc. (“Altimum”) Policies and Procedures Manual, and I agree to conduct my affairs in accordance with its contents. I understand that I am responsible for keeping my copy of the Manual up-to-date as amendments are published. I have also received a copy of National Instrument 81-102 and the Rules and Policies of the Mutual Fund Dealers Association of Canada.

I am aware that only products that have been approved by Altimum Mutuals Inc. may be offered for sale. I am aware that I may not discuss or solicit investments until I have obtained the necessary licences and have received approval from Altimum Mutuals Inc. I cannot solicit business for Altimum

This Manual is the confidential property of Altimum.

Date of Manual Version _____

Signed _____ Rep Code 7767 _____

Rep Name (print) _____ Date _____

Accepted by Altimum Mutuals Inc. _____ Date _____

Please return one copy of this page to Head Office and retain one copy for your files.

This second copy must also be provided to the Compliance Officer as part of your next compliance audit.

This receipt will be retained in your employee file at Head Office.

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