

Relationship Disclosure Information



DONVILLE | KENT
asset management inc.

March 1, 2025

Introduction

As a client of Donville Kent Asset Management Inc. (“**DKAM**”, “**Firm**”, “**we**” or “**us**”), it is important that you understand the nature of the services that will be provided by DKAM and what you, as a client and an investor, can and should do to ensure a satisfactory ongoing relationship. To this end, we are providing this Relationship Disclosure Information (“**RDI**”) document, which describes what an investor should know about DKAM to better understand the nature of our role and responsibilities. This document contains the following information:

- The RDI required to be delivered to you in accordance with Section 14.2 of National Instrument 31-103 - *Registrations Requirements, Exemptions and Ongoing Registrants Obligations* (“**NI 31-103**”);
- A description of the services we provide;
- A description of the potential conflicts of interest that could arise;
- A description of the complaints process available to you; and
- A description of our privacy policy.

Importance of this Document and Updates

We encourage you to read this document carefully to understand its contents. We are required under applicable securities laws to deliver to our clients all information that a reasonable investor would consider important about your relationship with us including, but not limited to, the services we offer, the fees and expenses we charge you, how we attempt to mitigate conflicts of interest and the risks that you should consider when making investments. Some of the information we are required to provide about our relationship with you may be contained in other documents we have provided to you or will provide to you from time to time. These additional documents are hereby incorporated by reference into this document.

When this RDI document is updated you will be informed of the updated RDI document through your chosen means of communication with DKAM.

Our Services

DKAM is an asset management firm that manages certain funds (see below) on behalf of individual investors as well as select institutions.

DKAM also acts as exempt market dealer for its proprietary funds, DKAM Capital Ideas Fund LP (the “**Partnership**”) and the DKAM Capital Ideas Trust (the “**Trust**” and together with the Partnership, the “**Funds**”). The Funds are prospectus exempt issuers which means that they are offered without the Funds having to file a prospectus or having the material reviewed by a securities regulator.

The scope of securities that DKAM will consider, facilitate or offer to a client is currently limited to proprietary products such as the Funds.

DKAM is registered under applicable securities legislation in Ontario in the categories of portfolio manager, exempt market dealer and investment fund manager, under applicable securities legislation in British Columbia, Alberta, Manitoba, Nova Scotia and Saskatchewan in the category of exempt market dealer and under applicable securities legislation in Québec in the categories of exempt market dealer and investment fund manager.

You will have an account with us (and be our client) if you invested in the Funds through us and continue to own the Funds. If you redeem your entire position in the Funds, or otherwise cease to own the Funds, you will no longer have an account with us (and will no longer be our client).

Our dealing representatives are available to discuss prospectus exemptions and assess whether you qualify to invest in the Funds.

Know Your Client (KYC) and Suitability

As an exempt market dealer, DKAM has an obligation to take reasonable steps to ensure that, before it makes a recommendation to or accepts an instruction from you to buy or sell a security or takes any investment action, as applicable, the investment action is suitable for you. DKAM must put the client's interest first when it takes an investment action for the client.

To meet this suitability obligation, we collect KYC information from you at the time you open an account with us, such as: information about your personal circumstances, financial situation, investment goals and objectives, investment horizon, investment knowledge and experience, and make a determination regarding your risk profile, which includes your willingness to accept risk (risk tolerance) and ability to endure financial loss (risk capacity).

To meet our suitability obligation, we must also "know" and understand each investment we place you in. Each DKAM dealing representative will analyze every investment we place you in or recommend to you. Without limitation, each dealing representative will generally consider such things as the track record of the investment product, the potential for profit and loss, the associated risk level and potential for conflicts of interest, the investment's time horizon and complexity and the specific features of any investment, including costs and fees, liquidity and redemption rights. The above KYC and suitability obligations may be waived by "permitted clients" as such term is defined under applicable securities laws.

Once we have collected your KYC information and we have conducted our "know your product" process, we use that information to determine whether or not an investment is suitable for you. Should there be any changes to your KYC information during the year, it is your responsibility to let us know as quickly as possible. We will update your KYC information as needed to satisfy our obligations under applicable securities laws. All personal, confidential information we receive from you will be treated in accordance with our Privacy Policy, a copy of which is contained at Appendix A to this document.

Fees and Charges

The costs associated with purchasing any of the Funds are set out in the disclosure documents of the relevant Fund, a copy of which has been provided to you. DKAM will not receive any commission for acting as exempt market dealer in connection with your subscription for units of the Funds but will be entitled to management fees in its capacity as investment manager of the applicable Fund.

A Note about Compounding Returns

Compounding returns is a process by which returns are earned on the principal balance in an account, such as the account of a fund, over multiple periods. If returns are retained and reinvested into the principal balance of the account, they thereby generate incremental returns on the prior returns generated in the account. That is, compounding refers to generating returns on previous returns. The effect of paying fees at the fund level is to reduce the principal balance of the value of the fund. Therefore, the effect of paying fees is the cost of the fees themselves in addition to the fact that there is less principal subject to the effects of compounding returns in the future.

How We Report To You

While you are our client, we will report to you as follows:

- ***Trade confirmations:*** We will promptly deliver to you (or if you consent in writing, to a registered adviser acting for you) a written confirmation of a trade where we have acted on your behalf in connection with a purchase of Units. A trade confirmation delivered to you will include certain transaction information such as the quantity and description of the security, the price paid or

received by you, the commission, sales charge or any other amount charged, the name of the dealing representative and the settlement date of the transaction.

- Account statements - We will provide quarterly (or monthly, upon written request) account statements to you, which will include:
 - Information about each transaction conducted for you during the time period covered by the statement; and
 - Information about each security held in your account at the end of the time period covered by the statement.
- Annual reports on charges and performance - We will provide annual reports of (i) the charges and compensation associated with your account, and (ii) the investment performance of the securities in your account, which will include an annualized total percentage return for your account.

Custody

DKAM does not hold client assets. Subscription proceeds payable to a Fund are initially deposited in an account for the applicable Fund held at a Canadian financial institution in Toronto, Ontario pending the subscription being processed. Any redemption proceeds are moved directly from such account to the redeeming investor. Once accepted, subscription proceeds for units of a Fund are transferred to the applicable Fund's operating account. Securities of the Funds distributed by DKAM are typically uncertificated and ownership of the securities held by the client is recorded in the name of the client in the applicable Fund's registers that are maintained by each Fund's fund administrator and overseen by the manager of the Fund.

As an adviser with discretionary trading authority over the Funds, we typically determine where and how Fund assets are held. The units of the Partnership issued to the Trust are recorded in the name of the Trust in the Partnership's books and records. The assets of the Partnership are typically held in one or more brokerage accounts, in the Partnership's name, with a prime broker that is independent from DKAM and qualified to act as a custodian under applicable securities laws. The Partnership's current prime broker is BMO Prime Brokerage. We have trading authority over the Partnership's brokerage accounts as well as the ability to move cash or assets to another account.

Although prime brokers are subject to various laws and regulations in various jurisdictions that are designed to protect their customers in the event of their insolvency, the practical effect of these laws and their application to the Partnership's assets are subject to substantial limitations and uncertainties. Because of the large number of entities and jurisdictions involved and the range of possible factual scenarios involving the insolvency of a prime broker or any sub-custodians, agents or affiliates, the insolvency of any of the prime brokers or such other service providers could result in the loss of all or a substantial portion of the Partnership's assets held by or through such prime broker and/or the delay in the payment of withdrawal proceeds.

Because the Partnership's strategies may involve the use of margin, short sales (requiring us to borrow securities), derivatives in which leverage is utilized and other forms of borrowing, the prime brokers and counterparties providing those services may hold portfolio assets as collateral or security. In many cases the broker retains the right to use those portfolio assets for their own purposes (such as securities lending). The risk of such prime brokerage arrangements include possible delays in receiving additional collateral, if any, or in recovery of the securities or possible loss of rights in the collateral, if any, should the borrower fail financially.

Investment Risks to Consider

You should be comfortable about where your money is invested. This requires you to think about and understand your own risk tolerance and the risk level of your investments. Please do not hesitate to contact us should you wish to review the specific risks which relate to you. When investing in securities generally as well as the exempt market, there are many risks that you should consider before making a decision, including:

- No guarantee - It is important that you understand that 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 (GICs), most securities are not covered by the Canada Deposit Insurance Corporation or any other government deposit insurer. This means that the value of your investment when you sell it may be more or less than when you bought it.

- Risk-Return Trade Off - Risk and return are closely related. This means that to obtain a higher return, you may have to accept a higher level of risk. A higher risk portfolio is generally less stable and fluctuates more. The more a portfolio's return fluctuates, the more risk is associated with the portfolio. It is therefore important to understand what we mean by "fluctuation" within a given period of time, a security may fluctuate, that is, it may suffer losses and realize gains. High-risk investments generally offer higher long-term returns than safer ones. Since they fluctuate more, high risk investments may post more negative short-term returns, compared to lower-risk investments.
- Risks Relating to Concentration - If you invest a large proportion of your assets in securities issued by one issuer, in a single asset class or in a single sector, it will have risk relating to concentration. When your investments are not diversified, you may experience greater volatility and will be strongly affected by changes in the market value of these securities.
- Risks Relating to Credit - An account can lose money if the issuer or a bond or other fixed income security cannot pay interest or repay principal when it comes due. This risk is higher if the fixed income security has a low credit rating or no rating at all. Fixed income securities with a low credit rating usually offer a higher yield than securities with a high credit rating but they also have the potential for substantial loss. These are known as "high yield securities".
- Risks Relating to the Suspension of Trading - Should an exchange suspend trading generally or halt or otherwise limit the trading in a security traded on that exchange, it may not be possible to liquidate positions, and this could expose an account to losses.
- Risks Relating to Interest Rate Fluctuations - Investments are 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 accounts holding debt or fixed income securities.
- Risks of Using Borrowed Money (Leveraging) to Finance the Purchase of a Security - 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. Securities may be purchased using available cash, or a combination of cash and borrowed money. If cash is used to pay for the security in full, the percentage gain or loss will equal the percentage increase or decrease in value of the security. The purchase of a security using borrowed money magnifies the gain or loss on the cash invested. This effect is called leveraging.
- Risks Relating to Small Entities - Small entities can be riskier investments than larger entities. For one thing, they are often newer and may not have a track record, extensive financial resources or a well-established market. This risk is especially true for private companies or companies that have recently become publicly traded. They generally do not have as many shares trading in the market, so it could be difficult to buy or sell small companies' stock or debt when it needs to.
- Risk Relating to Liquidity - Liquidity refers to the speed and ease with which an asset may be sold and converted into cash. Securities distributed by EMDs are typically not very liquid, i.e., which may not be sold quickly or easily. Such securities may not be liquid because of legal restrictions, the nature of the investment and/or certain characteristics of the security. The lack of purchasers interested in a given

security or market could also explain why a security may be less liquid. The difficulty of selling illiquid securities may result in a loss or a reduced return for you.

- **Risks Relating to Specialization** - Some clients prefer a mandate which invests in a particular industry or geographic area. If you invest in this way, it can be more volatile. Specialization lets you focus on specific areas of the economy, which will affect the performance of your investment depending upon changes in the sector and the businesses in the sector. Events or developments affecting that sector or part of the world may have a greater effect on such investments than if it had been more diversified.
- **Risks Relating to Investing in securities of the Funds** – The applicable offering memorandum and/or subscription agreement of the Funds, as applicable, detail the risk factors associated with securities of the Funds. The main risk factors that are described in those offering documents are hereby incorporated by reference into this document.

In purchasing any of the Funds, you should consider you or your entity's own risk tolerance and the risks involved with making an investment in the Funds. You must accept that an investment in any of the Funds is not guaranteed, and you could lose part or all of your investment. **A list of risks related to the purchase of securities of the Funds can be found in the applicable Fund's offering document. You should consult your own legal, tax and financial advisors with respect to the potential consequences of investing in a Fund with respect to your particular circumstances.**

Redemption, Liquidation and Resale Restrictions

The securities of the Funds are subject to redemption, liquidation and resale restrictions, the details of which are contained in the offering memorandum and/or constating documents of the applicable Fund. These provisions can impact an investor's ability to receive a return of their investment on short notice because proceeds will only be returned to an investor in accordance with the terms of the offering memorandum and/or constating documents. Further, since securities of the Funds are not publicly listed, they are not trading freely on an exchange and are subject to resale restrictions under applicable securities law and pursuant to the governing documents applicable to each Fund.

Conflicts of Interest

Under applicable Canadian securities laws, we are required to address and manage existing, as well as reasonably foreseeable, material conflicts in the best interests of our clients. A conflict of interest can include any circumstance where:

- a) the interests of different parties, such as the interests of the firm and those of a client, are inconsistent or divergent;
- b) the firm or one of its registered representatives may be influenced to put their interests ahead of a client's interests; or
- c) monetary or non-monetary benefits available to the firm or a registered representative, or potential detriments to which they may be subject, may compromise the trust that a reasonable client has in the firm or the individual.

Whether a conflict is "material" or not depends on the circumstances. In determining whether a conflict is material, we will typically consider whether the conflict may be reasonably expected to affect the decisions of our clients in the circumstances, and/or the recommendations or decisions of the Firm or its registered representatives in the circumstances.

What follows below are details regarding the specific material conflicts of interest that we have identified to date. In case other material conflicts of interest arise, which may happen from time to time, we will inform you

of the nature and extent of any such other conflicts of interest prior to any of your subsequent transactions with us or our advice to you.

1. Proprietary Products and Connected Issuers

For the purposes of this summary, (i) the word “connected” is intended to involve a state of indebtedness to, or other relationship with, the registrant or those “related” to the registrant that, in connection with a distribution of securities, would be material to a purchaser of the securities; and (ii) the word “related” is intended to involve positions permitting, through ownership or otherwise, a controlling influence, and would include all companies under a common controlling influence.

DKAM’s business model includes managing the Funds. The Funds are connected/related to DKAM because the Firm established the Funds and acts as their portfolio manager and investment fund manager. DKAM established the Funds and acts as their portfolio manager and investment fund manager. DKAM receives management fees based on a percentage of the net asset value of the Partnership and is affiliated with the general partner of the Partnership and the entity entitled to receive the profit allocation from the Partnership.

Regulators have noted that where a registered firm distributes securities of connected/related issuers, a material conflict of interest exists because DKAM may have an incentive to recommend the Funds to its clients over other third-party funds that do not provide similar incentives. DKAM may also be incented to fail to disclose or provide inadequate disclosure to investors about the Funds in cases where there is negative information (for example, where a company owned by one of the Funds is experiencing financial difficulty), resulting in investors taking on more risk than they could, or wish to, bear.

DKAM takes the following steps to mitigate the actual and potential conflicts of interest described above:

- On an annual basis, DKAM conducts an analysis of similar funds available to a similar client base. DKAM is comfortable that the Funds compare favorably to these similar funds.
- DKAM has policies and procedures in place to ensure that its representatives conduct a suitability analysis for each client accepted into the Funds. This suitability analysis ensures that the Funds are appropriate for that client. Certain types of clients may be able to waive this suitability.
- In conducting its suitability analysis for a client, each representative of DKAM will have a thorough understanding of: (i) the structure and features of the Funds; and (ii) amongst other client information, the personal and financial circumstances of that relevant client.
- DKAM has retained independent legal and regulatory counsel to provide periodic training regarding a representative’s suitability obligations when accepting a client into the Funds.

2. Internal Compensation Arrangements

DKAM’s employees may be perceived as incentivized to recommend certain products or services over others. Certain dealing representatives receive variable compensation tied to the level of assets that are invested in the Funds. Certain dealing representatives are also minority shareholders of DKAM. As a result, DKAM employees could be perceived as motivated by the Firm to encourage the purchase of any of the Funds. This increases the risk that a client may be placed in an unsuitable investment.

DKAM takes the following steps to mitigate the actual and potential conflicts of interest described above:

- Any variable element of employee compensation is generally smaller than the fixed component. Accordingly, the primary compensation driver for DKAM employees is not tied to any selling or activities.
- DKAM has developed client profiles outlining the types of investors for whom the Funds may be suitable.
- Over the course of several years, the commission structures for the products distributed by DKAM are considered to be neutral.
- DKAM has policies and procedures in place to ensure that its representatives conduct a suitability analysis for each recommendation they make. This suitability analysis ensures that any recommendation is appropriate for that client. Certain types of clients may be able to waive this suitability assessment.
- DKAM monitors the performance of the Funds to satisfy its know-your-product and suitability obligations and to assess whether securities of the Funds are competitive with comparable alternatives in the market.
- The Chief Compliance Officer reviews a sample of client files and suitability assessments of registered DKAM employees receiving variable compensation from time to time. DKAM employees understand that any variable bonus compensation could be affected if suitability issues are found during these reviews.

3. *Conflicts at the Supervisory Level*

One of the mitigation tools that DKAM uses to control for the compensation conflicts of its employees (see Item 3 above) is a Chief Compliance Officer review of suitability recommendations. However, it may be perceived that the Chief Compliance Officer could be conflicted during these reviews because the Chief Compliance Officer may receive a discretionary bonus that may vary based on Fund performance and the level of assets under management and because the Chief Compliance Officer is also a minority shareholder of DKAM. This increases the risk that a client may be placed in an unsuitable investment due to ineffective oversight of the activities of registered representatives. To address this conflict, DKAM has structured the compensation of its Chief Compliance Officer such that any variable bonus compensation represents a small portion of his overall compensation package.

4. *Outside Activities and Director Positions with Issuers*

DKAM's registered individuals may become involved in other activities outside of their employment with DKAM (e.g., sitting on boards of directors or providing volunteer services for a charity). These outside activities could: (i) impact the amount of time a DKAM registered individual spends on DKAM employment or registration obligations; and (ii) create a conflicting interest as to how a DKAM registered individual discharges its obligations to DKAM or its clients.

DKAM has policies and procedures to ensure that all outside activities are reported to and considered by its Chief Compliance Officer. The Chief Compliance Officer will only approve such outside activities that do not conflict with DKAM's operations or obligations.

5. *Best Execution*

DKAM may hire a brokerage firm to execute trades on behalf of the Funds based on a pre-existing relationship, rather than objective qualitative or quantitative considerations. This is considered a best execution conflict of interest. This conflict creates a risk that portfolio managers execute trades with broker-dealers for relationship or other reasons and pay higher commissions or other fees than those that may be charged by other broker-dealers or otherwise do not obtain best execution for the Funds which could impact returns to Fund investors.

DKAM has policies and procedures to ensure that when DKAM directs brokerage transactions to brokers, the service is comparable to that which DKAM may obtain from other brokers and the commission rates are equivalent to or better than those that would have been normally charged by the broker. DKAM monitors the level of service provided by any broker retained on behalf of the Funds with respect to the cost and execution of trades.

6. *Fair Allocation of Investment Opportunities*

DKAM owes its clients a duty to treat each client fairly. This duty must be considered when allocating investment opportunities. The potential impact and risk of this conflict is that DKAM could be motivated to provide select investment opportunities to certain clients in preference over other clients. In addition, registered representatives of DKAM and/or employees of DKAM (and/or its affiliates) may also invest in securities of the Funds alongside clients. The latter presents a material conflict of interest because it may impact the recommendations or decisions of dealing representatives including prioritizing their own purchases and/or redemptions of securities over those of their clients.

Over the time period in which DKAM acts as an exempt market dealer for a client, no client shall receive preferential treatment over any other client. It is DKAM's policy that all clients should be treated fairly and in allocating securities or investment opportunities among clients, all clients should receive equivalent treatment on an aggregated basis.

Because of the differences in client investment objectives and strategies, risk tolerances, tax status and other criteria, there may be differences among clients in invested positions and securities held. The following factors may be taken into account by DKAM in allocating securities among its clients: (i) client's investment objective and strategies, (ii) client's risk profile, (iii) client's tax status, (iv) any restrictions introduced by the client, (v) size of the client's investment or ability to invest, (vi) nature of the security to be allocated, (vii) size of available position, (viii) supply or demand for a security, (ix) current market conditions, (x) timing of cash flows and account liquidity, (xi) previous opportunities offered to a client, and (xii) any other information determined to be relevant to the fair allocation of securities.

Investments in the Funds by DKAM personnel do not receive preferential treatment and are subject to the same processes as any other DKAM client. If applicable, transactions for clients shall have priority over transactions for DKAM personnel so that no client's interest is adversely affected as a result of such transactions.

7. *Valuation of the Funds*

DKAM could be presented with a material conflict of interest when determining the valuation of the Funds or in dealing with a pricing error, should one occur.

The potential impact and risk of these conflicts is that DKAM may be motivated to support a valuation of a Fund or deal with a pricing error in a manner that would be in its interest as a firm rather than purely in the interest of the applicable Fund.

In addition to disclosing this conflict of interest to you, we use independent, third-party service providers to assist us with calculating the net asset value of the Funds and to determine pricing. Our policies and procedures establish standards for any correction to the calculation of a net asset value in a consistent manner and in accordance with industry guidelines.

8. *Pricing and Account Errors for the Funds*

DKAM could be presented with a pricing error. The potential impact and risk of this conflict is that DKAM could be motivated to pass the cost of an error to the Funds rather than to have the cost absorbed by the firm.

DKAM has a written policy that establishes standards for the correction of discrepancies in the calculation of net asset value in a consistent manner and which is in accordance with industry guidelines.

9. *Profit Allocation*

An affiliate of DKAM will share in profits of the Partnership by receiving distributions. This profit allocation creates a potential conflict of interest because of the incentive for DKAM to cause the Partnership to make investments that are riskier or more speculative than would be the case in the absence of distributions payable to DKAM or an affiliate based on the performance of the Partnership. This conflict is addressed by ensuring that investments will only be made in the context of a portfolio that meets the Partnership's investment objective and risk tolerance and DKAM must act in the Partnership's best interest when selecting investments.

10. *Fund Expense Allocation*

DKAM can be presented with a material conflict of interest when determining whether certain expenses should be allocated to it or to fund that it manages (in which case, the expense being borne by the fund will reduce its potential investment return to its unitholders).

The nature of this conflict of interest and risk is that it could be in DKAM's interest to allocate expenses to a fund rather than to itself, as expenses allocated to a fund are indirectly borne by its holders rather than by the firm. The amount of expenses charged to a fund has a direct impact on its management expense ratio and will reduce its potential investment return to its holders.

DKAM has a duty to make sure that expenses are allocated to itself or to the relevant fund in a fair, accurate and appropriate manner and in accordance with the requirements of applicable Canadian securities laws. Similarly, DKAM's expense allocation practices must be consistent with the terms of the agreements governing the fund and the disclosure of such terms in the relevant fund's offering documents.

To address this potential conflict of interest, DKAM has adopted an expense allocation policy and makes its expense allocation determinations in accordance with the policy.

11. *Referral Arrangements*

DKAM does not currently have any referral arrangements in place. DKAM may enter referral arrangements from time to time pursuant to which another party may refer clients to us for whom we pay a referral fee, or we may refer clients to another party and receive a referral fee. We will provide affected clients with the details of any such arrangement where applicable, including the parties to the arrangement, the manner in which the referral fee is calculated and the party to whom it is paid. Entering into referral arrangements presents a material conflict of interest because the payment of a referral fee to obtain a client, or the receipt of a referral fee to refer a client, can influence a registrant to put their interests in growing their business or receiving referral fee revenue ahead of their client's interests.

12. Personal Trading

When individual portfolio managers and other DKAM personnel invest in the same securities as the funds they manage, there is a perceived or potential conflict of interest that the portfolio manager or other personnel may benefit from opportunities at the expense of the funds. This type of conflict can amount to a material conflict. DKAM has policies and procedures in place that set forth standards of business conduct intended to manage this conflict of interest and prevent diversions of corporate opportunity or appearances of impropriety as well as prohibited practices such as self-dealing and front running. DKAM has established policies and procedures for monitoring personal trades of employees, officers and directors who have access to information regarding the Fund portfolios so that DKAM personnel do not place their interests ahead of the Funds.

13. Gifts and Entertainment

While it is recognized that conducting business may involve some modest exchange of gifts and business-related entertainment, the value of such gifts and entertainment must not create a real or perceived conflict of interest and must not impair the independence or objectivity of the recipient.

The potential impact and risk of this conflict is that receiving gifts or business entertainment from a client outside of acceptable standards may lead an individual to put that client's interests ahead of other client's interests. Additionally, providing gifts or business entertainment to a client outside of acceptable standards may be viewed as an undue attempt to gain a client's favour.

DKAM has policies and procedures in place with respect to the receipt or giving of gifts and/or entertainment. These policies and procedures require employees to contact the Chief Compliance Officer with any concerns about the receipt or giving of a gift or entertainment and whether that may create a conflict of interest. Further, employees are required to notify the Chief Compliance Officer upon receipt of a gift or entertainment in excess of \$200 (on an individual basis).

Verification of Client Identity

Canada's anti-money laundering regulations and enhanced international information reporting obligations require us to verify your identity before we can execute any transactions on your behalf. The methods of identity verification are prescribed in the regulations of the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* (Canada) and the *Income Tax Act* (Canada) and CRA guidance related thereto.

Benchmarks

An investment performance benchmark is a market or industry sector index against which you can measure the relative performance of your investment. By comparing your investment to an appropriate benchmark, you can see how your investment performed compared to the market or industry sector in general. Benchmarks should reflect a similar asset class, industry sector and/or risk level so they are comparable to the investment you are comparing the performance to. We do not currently offer benchmark comparisons to our clients.

Statement of Policies Concerning the "Self-Dealing" Restrictions

DKAM is subject to the "self-dealing" restrictions in applicable securities legislation, which prohibit it from purchasing a security of an issuer in which a "responsible person" (as such term is defined in applicable securities legislation) of DKAM or an "associate" (as such term is defined in applicable securities legislation) thereof is a partner, officer or director unless this fact is disclosed to the client and the written consent of the client to the purchase is obtained before the purchase.

Certain Funds currently own, and/or may in the future own, securities of issuers in which a responsible person of DKAM or an associate thereof is a partner, officer or director. DKAM has policies and procedures to ensure that any responsible person of DKAM or an associate thereof only acts in the best interest of the applicable Funds and to avoid any conflict of interest that may arise from such individual's relationship with an issuer described in the preceding paragraph. Such policies and procedures are generally designed to segregate the role that such individual plays in the affairs of DKAM with respect to any applicable Funds from the role that such individual plays in the

affairs of such issuer, and includes the requirements prohibiting disclosure of information about such issuer to DKAM and vice versa, as well as the requirements for such individual to recuse himself or herself from being involved in making any decisions of such issuer relating to any Funds and from being involved in making any decisions of DKAM on behalf of any of the Funds relating to such issuer. DKAM will ensure that such policies and procedures are enforced at all times.

Privacy

We have adopted a privacy policy in accordance with the *Personal Information Protection and Electronic Documents Act* (Canada) with respect to personal information of our clients. This policy states that we will only disclose this information to third parties or its affiliates in limited specific circumstances on a strictly confidential basis. Please see Appendix A for our privacy policy.

Complaints

If you have a complaint we will make every reasonable effort to deal with it to your satisfaction. You may make your complaint orally or in writing. However, we request that you make your complaint in writing and provide as many relevant details as possible. Please see Appendix B for our complaint process.

If you are a resident of Quebec: Your independent service will be the Autorité des marchés financiers (the “AMF”). For more information about the AMF, please visit autorite.qc.ca. You can contact the AMF via telephone toll-free at 1-877-525-0337.

Your relationship with us

It is important that you actively participate in our relationship. In particular, we encourage you to:

- Keep us fully and accurately informed regarding your personal circumstances, and promptly advise us of any change to information that could reasonably result in a change to the types of investments appropriate for you, such as a change to your income, investment objectives, risk tolerance, time horizon or net worth.
- Review the documentation and other information we provide to you regarding your account, transactions conducted on your behalf and the holdings in your portfolio.
- Ask questions of and request information from us to address any questions you have about your account, transactions conducted on your behalf or the Units that you hold, or your relationship with us or anyone acting on our behalf.

Appendix A Privacy Policy

The privacy of our investors is very important to us. Set forth below are our policies with respect to personal information of subscribers, investors and former investors that we collect, use and disclose. In connection with the offering and sale of the Funds, we collect and maintain personal information about subscribers. We collect your personal information to enable us to provide you with services in connection with your investment in the Funds, to meet legal and regulatory requirements and for any other purpose to which you may consent in the future. Investors' personal information is collected from the following sources:

- subscription agreements or other forms that you submit to us;
- your transactions with us and our affiliates; and
- meetings and telephone conversations with you.

Unless you otherwise advise, by providing us with your personal information you have consented to our collection, use and disclosure of your information as provided herein. We collect and maintain your personal information in order to give you the best possible service and allow us to establish your identity, protect us from error and fraud, comply with the law and assess your eligibility in our products.

We may disclose your personal information to third parties, when necessary, and to our affiliates in connection with the services we provide related to your subscription for Units of the Funds, including:

- financial service providers, such as banks and others used to finance or facilitate transactions by, or operations of, the Funds;
- other service providers to the Funds, such as accounting, legal, or tax preparation services; and
- taxation and regulatory authorities and agencies.

We seek to carefully safeguard your private information and, to that end, restrict access to personal information about you to those employees and other persons who need to know the information to enable us to provide services to you. Each employee of Donville Kent CI GenPar Inc. and Donville Kent Asset Management Inc. is responsible for ensuring the confidentiality of all personal information they may access.

Investors' personal information is maintained on our networks or on the networks of our service providers and are accessible at 40 King Street West, Suite 6202 Toronto, Ontario M5H 3Y2. Personal information may also be stored on a secure off-site storage facility. You may access your personal information to verify its accuracy, to withdraw your consent to any of the foregoing collections, uses and/or disclosures being made of your personal information and may update your information by contacting DKAM Asset Management Inc. at the following number: (416) 364-8505. Please note that your ability to participate in the Funds may be impacted should you withdraw your consent to the collection, use and disclosure of your personal information as outlined above.

Pursuant to applicable securities laws, DKAM is required to periodically file a report of exempt distribution (the "**Report**") on behalf of the Funds, as applicable, with certain regulatory authorities, including the Ontario Securities Commission (the "**Regulators**"). The Report is required to include certain personal information about the purchasers of the Funds and details of the distribution including, without limitation: a subscriber's name, address telephone number, e-mail address, the number and type of securities purchased; the date of the distribution; the purchase price of the securities issued; the prospectus exemption relied on; and whether the subscriber is a registrant under applicable securities laws. Such information is collected indirectly by the applicable Regulator under the authority granted to it in securities legislation for the purposes of the administration and enforcement of such securities legislation in the local jurisdiction. When signing the subscription agreement, the subscriber authorizes such indirect collection of the information by the applicable Regulator. The contact information for the public official in the local jurisdiction who can answer questions about the Regulator's indirect collection of the information is as follows:

PUBLIC OFFICIAL INFORMATION RE: INDIRECT COLLECTION OF PERSONAL INFORMATION

Alberta Securities Commission

Suite 600, 250 - 5th Street SW
Calgary, Alberta T2P 0R4
Telephone: (403) 297-6454
Toll free in Canada: 1-877-355-0585
Public official contact: FOIP
Coordinator

**British Columbia Securities
Commission**

P.O. Box 10142, Pacific Centre
701 West Georgia Street
Vancouver, British Columbia V7Y 1L2
Inquiries: (604) 899-6506
Toll free in Canada: 1-800-373-6393
Email:
Public official contact: Privacy Officer

The Manitoba Securities Commission

500 - 400 St. Mary Avenue
Winnipeg, Manitoba R3C 4K5 Telephone:
(204) 945-2561
Toll free in Manitoba 1-800-655-5244
Public official contact: Director

**Financial and Consumer Services
Commission (New Brunswick)**

85 Charlotte Street, Suite 300
Saint John, New Brunswick E2L 2J2
Telephone: (506) 658-3060
Toll free in Canada: 1-866-933-2222
Email: info@fcnb.ca
Public official contact: Chief
Executive Officer and Privacy Officer

**Government of Newfoundland and
Labrador, Office of the Superintendent
Department of Digital Government and
Service NL**

P.O. Box 8700, Confederation Building
2nd Floor, West Block, Prince Philip
Drive
St. John's, Newfoundland and Labrador
A1B 4J6 , Attention: Director of Securities
Telephone: (709) 729-2571
Public official contact: Superintendent of
Securities

Government of the Northwest

**Territories Office of the Superintendent
of Securities**
P.O. Box 1320
Yellowknife, Northwest Territories X1A
2L9
Telephone: (867) 767-9305
Public official contact: Superintendent of
Securities

Nova Scotia Securities Commission

Suite 400, 5251 Duke Street Duke
Tower P.O. Box 458
Halifax, Nova Scotia B3J 2P8
Telephone: (902) 424-7768
Public official contact: Executive
Director

**Government of Nunavut
Office of the Superintendent of
Securities**

Legal Registries Division
P.O. Box 1000, Station 570
4thFloor, Building 1106
Iqaluit, Nunavut X0A 0H0
Telephone: (867) 975-6590
Public official contact: Superintendent of
Securities

Ontario Securities Commission

20 Queen Street West, 22nd Floor
Toronto, Ontario M5H 3S8
Telephone: (416) 593-8314
Toll free in Canada: 1-877-785-1555
Email:
exemptmarketfilings@osc.gov.on.ca
Public official contact: Inquiries Officer

**Prince Edward Island Securities
Office**

95 Rochford Street, 4th Floor Shaw
Building P.O. Box 2000
Charlottetown, Prince Edward Island
C1A 7N8
Telephone: (902) 368-4569
Public official contact:
Superintendent of Securities

**Government of Yukon Department of
Community Services**

Office of the Superintendent of Securities
307 Black Street
Whitehorse, Yukon Y1A 2N1
Telephone: 867-667-5466
Email: securities@gov.yk.ca
Public official contact: Superintendent of
Securities

**Financial and Consumer Affairs
Authority of Saskatchewan**

Suite 601-1919 Saskatchewan Drive
Regina, Saskatchewan S4P 4H2
Telephone: (306) 787-5842
Public official contact: Executive Director,
Securities Division

Autorite des marches financiers

800, Square Victoria, 22e etage
C.P. 246, Tour de la Bourse
Montreal, Quebec H4Z 1G3
Telephone: (514) 395-0337 or 1-877-
525-0337 Facsimile: (514) 873-6155
(For filing purposes only)
Email:fonds_dinvestissement@lauri
te.qc.ca (For investment fund issuers)
Public official contact: Secetaire
generate

Appendix B

What To Do If You Have A Complaint

Our complaint process

Filing a complaint with us

If you have a complaint about our services or a product, contact us at

40 King Street West, Suite 6202
Toronto, ON, M5H 3Y2
Phone: (416)364-8505

You may want to consider using a method other than email for sensitive information.

Tell us:

- what went wrong
- when it happened
- what you expect, for example, money back, an apology, account correction

We will acknowledge your complaint

We will acknowledge your complaint in writing, as soon as possible, typically within 5 business days of receiving your complaint.

We may ask you to provide clarification or more information to help us resolve your complaint.

We will provide our decision

We normally provide our decision in writing, within 90 days of receiving a complaint. It will include:

- a summary of the complaint
- the results of our investigation
- our decision to make an offer to resolve the complaint or deny it, and an explanation of our decision

If our decision is delayed

If we cannot provide you with our decision within 90 days, we will:

- inform you of the delay
- explain why our decision is delayed, and
- give you a new date for our decision

If you are not satisfied with our decision

You may be eligible for the independent dispute resolution service offered by the *Authorité des marchés financiers* (Québec) (if you are a resident of Québec) or by the Ombudsman for Banking Services and Investments (OBSI) (if you are a resident of another Canadian jurisdiction) free of charge to you.

Taking your complaint to OBSI

You may be eligible for OBSI's free and independent dispute resolution service if:

- we do not provide our decision within 90 days after you made your complaint, or
- you are not satisfied with our decision

Help us resolve your complaint sooner

- Make your complaint as soon as possible.
- Reply promptly if we ask you for more information.
- Keep copies of all relevant documents, such as letters, emails and notes of conversations with us.

A word about legal advice

You always have the right to go to a lawyer or seek other ways of resolving your dispute at any time. A lawyer can advise you of your options. There are time limits for taking legal action. Delays could limit your options and legal rights later on.

OBSI can recommend compensation of up to \$350,000. OBSI's service is available to clients of our firm. This does not restrict your ability to take a complaint to a dispute resolution service of your choosing at your own expense, or to bring an action in court. Keep in mind there are time limits for taking legal action.

THE AMF (QUÉBEC)

If you are a resident of Québec and are dissatisfied with our processing of the complaint or the outcome, you can request that our complaint record be examined by the Autorité des marchés financiers (Québec). The Autorité will examine the complaint records and may, with the parties' consent, act as conciliator or mediator regarding the complaint or designate a person to act as such. Applicable Québec securities laws provides that conciliation or mediation may not, alone or in combination, continue for more than 60 days after the date of the first conciliation or mediation session unless the parties consent. Conciliation and mediation are free of charge to you.

Who can use OBSI

You have the right to use OBSI's service if:

- your complaint relates to a trading or advising activity of our firm or by one of our representatives
- you brought your complaint to us within 6 years from the time that you first knew, or ought to have known, about the event that caused the complaint, and
- you file your complaint with OBSI according to its time limits below

Time limits apply

- If we do not provide you with our decision within 90 days, you can take your complaint to OBSI any time after the 90-day period has ended.
- If you are not satisfied with our decision, you have up to 180 days after we provide you with our decision to take your complaint to OBSI.

Filing a complaint with OBSI

Contact OBSI

Email: ombudsman@obsi.ca

Telephone: 1-888-451-4519 or 416-287-2877 in Toronto

OBSI will investigate

OBSI works confidentially and in an informal manner. It is not like going to court, and you do not need a lawyer.

During its investigation, OBSI may interview you and representatives of our firm. We are required to cooperate in OBSI's investigations.

OBSI will provide its recommendations

Once OBSI has completed its investigation, it will provide its recommendations to you and us. OBSI's recommendations are not currently binding on you or us.

OBSI can recommend compensation of up to \$350,000. If your claim is higher, you will have to agree to that limit on any compensation you seek through OBSI. If you want to recover more than \$350,000, you may want to consider another option, such as legal action, to resolve your complaint.

Information OBSI needs to help you

OBSI can help you best if you promptly provide all relevant information, including:

- your name and contact information
- our firm's name and contact information
- the names and contact information of any of our representatives who have been involved in your complaint
- details of your complaint
- all relevant documents, including any correspondence and notes of discussions with us

For more information about OBSI, visit www.obsi.ca