

DISCLOSURES RELATING TO BEST EXECUTION AND MULTIPLE MARKETPLACES

In this section you will find a summary of our best execution policy.

As a market participant, Laurentian Bank Securities (“LBS”) is obliged under Investment Industry Regulatory Organization of Canada (“IIROC”) Dealer Member Rule 3300 to provide best execution when accepting Clients instructions to transact in securities, listed and unlisted (“OTC”), quoted or traded, on Canadian marketplaces.

As per IIROC Dealer Member Rule 3300.2, LBS shall establish, maintain and ensure compliance with written policies and procedures that are reasonably designed to achieve best execution when acting for a client. In this context, best execution means that LBS will diligently pursue to obtain the best possible result when executing, placing or transmitting client orders on behalf of a client or when dealing on a Request for Quote (“RFQ”). We aim to provide best execution both for orders individually and for all clients’ orders in aggregate.

Despite any instruction or consent of the client, achieving best execution for a client order for any listed security remains subject to compliance with the Order Protection Rule under Part 6 of the Trading Rules.

Best Execution Factors

In providing best execution, amongst other things, we take into account the following factors:

- Price;
- Speed of execution;
- Certainty of execution;
- Overall cost of the transaction to the client;
- Conflicts of interest for order handling and execution;
- Order size;
- Reliability of quotes;
- Instruction of the client;
- Liquidity; and
- Market Impact.

Execution Fees & Other Costs

LBS may incur costs and may also receive payments associated to trading on one venue versus another one. LBS may pass these costs or potential costs saving to its clients. However, LBS does not structure or charge commissions in a way to discriminate unfairly between execution venues. Any execution costs passed on will be disclosed to the client.

Securities

Securities that are covered by this policy are:

- Common stocks;
- Preferred stocks;

- Debt Securities;
- Convertible Debentures;
- Rights/ Warrants;
- Exchange Traded Funds;
- Structured Products;
- Exchange Traded Derivatives.

To achieve best execution, LBS may route orders to any Canadian marketplace which may include both lit and dark market venue. LBS may also route orders to foreign marketplaces through intermediaries or affiliates taking into account foreign exchange rates, market conditions and any potential liquidity in Canada.

Marketplace Trading Hours

Orders received prior to the opening at 9:30 a.m.: will be entered for execution at the opening of a marketplace with trading hours of 9:30 a.m. to 4:00 p.m., unless otherwise specified by the Client.

Orders received after 4:00 p.m.: new order received after 4 .p.m. and “Good till Cancelled” orders will be entered the next business day to the pre-opening of a marketplace with market hours from 9:30 a.m. to 4:00 p.m., unless specified by the investor for execution in the after-hours markets or pre-market open the next day. These orders will not be routed automatically to an alternative marketplace.

ORDER TYPES

Market Orders

Market orders are orders to buy or sell a security at the current prevailing market price, to help ensure a complete and full execution. LBS immediately routes market orders via its computerized system, which checks every available market and books the order on the market that guarantees the best price, unless LBS considers that delaying the execution of the order is in the clients' interest.

Limit Orders

A Limit Order is an order for a security at a specific minimum sale price or maximum purchase price that is not to be exceeded. Limit Orders will be handled in accordance with the “Standard Handling of Orders”. The order will expire, if not filled in full, upon the close of the marketplace where the last portion of the order remains live.

Stop Loss Orders

Stop Loss Orders are orders that become limit orders when a board lot is traded at, or superior to, the stop loss price on the marketplace in which the order has been booked. These orders will only be directed to the TSX until executed or expiry, whichever comes first. If the order is filled when the relevant stock or overall market is experiencing rapid price declines, the client may receive a price that is much lower than expected. As an alternative, a client can place stop loss limit orders. A stop loss limit order allows a client to define the lowest price the client is prepared to sell at once the “on stop” is activated, in effect creating a price range for the client's sell order.

DURATION ORDERS OR GOOD-TIL-CANCELLED ORDERS

Day Orders

This type of order, which is valid for one day only, instructs the receiving market to automatically expire the order if it has not been executed in the same trading day.

Good-Til-Cancelled Orders or Good Through Orders

This type of order remains active until it is cancelled by the client or until it exceeds its set duration. The maximum duration for this type of order is 90 calendar days. Clients are responsible for monitoring the evolution of their orders and to contact their Investment Advisors to extend their orders before they expire. Orders can also have a set expiry date within the 90 day period.

Special Terms Orders

Special Terms Orders are orders with specific terms that are not executable in the regular marketplace. Special Terms Orders will only post to the Special Terms Market of the principal marketplace, unless they are immediately executable on an alternative marketplace at the time of entry. Special Terms Orders will expire at the close of the principal marketplace.

Market-on-Close Orders

The "market-on-close" designation means that the order is, in whole or in part, to be executed at the official closing price of the marketplace it is entered upon. Not all markets support this type of order in their systems. For more details, please contact your Investment Advisor.

OTC Securities

In order to meet its best execution obligation for OTC securities, LBS pursues fair and reasonable pricing at the time of execution. Pricing is dependent on various factors, such as:

- Liquidity of the security;
- Relative fair market value of the security;
- Indicative pricing of other similar securities or benchmark references;
- Cost analysis, including any costs associated with the execution of the transaction;
- Notional amount of the trade; or
- If both parties agree on a price such as when LBS acts only as an agent for execution purposes.

LBS provides liquidity by:

- Acting as a principal;
- Acting as agent by:
 - sourcing and pricing securities through the Inter-dealer network;
 - participating in third-party request for quote vendor platforms; or

- sourcing bids or offers for a security from either our customers or another dealer.

LBS may choose not to either quote a security or participate as a market maker where market conditions are not favorable or where liquidity is not obtainable.

If you have any questions, please contact your LBS Representative.

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