

Declaring and managing conflicts of interest



In accordance with recent enhanced securities regulations and our commitment to transparency and fairness with our clients, Investia Financial Services Inc. (Investia or we) is reviewing how we address all existing material conflicts of interests and reasonably foreseeable material conflicts of interest between us and our clients. Investia seeks to manage conflicts of interest in the best interests of our clients. A conflict of interest arises when the interests of different persons, specifically your interests and those of Investia or one of our employees, representatives, administrators, or managers are incompatible or divergent.

Accordingly, conflicts of interest may occasionally arise between you and:

- Investia or your Representative;
- a person or company with whom we have a relationship.

We have adopted policies and procedures to effectively address conflicts of interest in our clients' best interests.

- We seek to avoid or minimize conflicts where reasonably possible.
- We avoid conflicts prohibited by law as well as material conflicts that we cannot effectively manage in your best interests.
- We control or manage acceptable conflicts by physically separating different business functions, restricting the internal exchange of information in person or through systems, reducing the possibility of one part of our organization unsuitably influencing another, removing any financial incentives for employees to favour a particular product or service over another that may be more suitable, and setting up and testing our operational review and approval processes.

Investia is a member of the iA Financial Corporation Group

We are a wholly owned subsidiary of iA Financial Corporation Inc. (**iA Financial**). Our relationship to iA Financial and its other financial services subsidiaries (the iA Financial group) creates conflicts of interest when we provide products and services to you that are sourced from or provided by other members of the iA Financial Group. This means that we may encourage you to do more business with us and the other members of the iA Financial Group, and we may engage affiliates to provide us with products and services for your account, but will always do so in a way that we consider in your best interests. We will only enter into these transactions or arrangements where we are permitted under applicable securities laws and where we believe they are in your best interests. Any relationships that an Investia director or officer might have with another iA Financial Group entity do not raise material conflicts as none of the individuals is in a position to personally influence clients of Investia to invest in any of the investment products of the iA Financial Group, nor are they compensated by any of the iA Financial Group entities on a commission or other basis that could result in decisions being made, or influence being exerted, against the interests of any of our customers. The following iA Financial Group entities are related registrants and/or connected issuers to Investia: IA Clarington Investments Inc., a manager of mutual funds and a portfolio manager; – iA Private Wealth Inc., a securities dealer; – FIN-XO Securities Inc., a securities dealer; – Industrial Alliance Investment Management Inc., a portfolio manager; – PPI Management Inc., an insurance brokerage agency; – iA Global Asset Management Inc., a portfolio manager; – IA Securities (USA) Inc., a broker-dealer, and; – iA Private Wealth USA, a Registered Investment Advisor (RIA).

All advice, products and services provided to clients by representatives who act on behalf of Investia shall be made in the normal course of business, without iA Financial Group or one of the entities currently connected or affiliated with it being involved. Investia shall maintain its decision-making and operational autonomy with respect to the advice, products and services that it offers while considering the best interests of clients.

Investia's approved product shelf is made up of both non-proprietary and proprietary funds. Please note that

IA Clarington Investments Inc. manages the IA Clarington family of investment funds. IA Clarington investment funds are related and connected issuers to Investia. All mutual funds offered to our clients, whether they are non-proprietary or proprietary, are assessed for suitability and subject to the same due diligence review process to ensure that the recommendation is in the best interest of the client based on the recorded KYC / risk profile. There is no incentive or additional compensation to Investia and your Representative for recommending IA Clarington mutual funds.

Compensation to Investia – Mutual funds or other investments

When you purchase or hold a mutual fund or another investment product through Investia, Investia may receive a commission at the time of the sale and may also earn an ongoing commission (also known as a trailer fee) for as long as you hold the product. These sales charges and ongoing commissions are paid to Investia by the manager or administrator of the product. For investments that are distributed publicly under a prospectus, there is full disclosure of these payments in the Fund Facts document and prospectus documents for the investments.

IA Clarington Series L securities

Effective June 1, 2022, Series L funds are closed to all new purchases. Clients are only able to switch existing holdings to another Series L fund that they may hold in their portfolio or redeem the existing holding. For existing holdings in Series L securities of IA Clarington mutual funds, IA Clarington as the manager of the funds paid us an up-front commission at the time of purchase. If the holding is redeemed within three years of the purchase date, Investia will repay the commission to IA Clarington. This arrangement is disclosed in the Fund Facts document you received at the time you invested in the Series L units.

Investia nominee account fee-waiving program

Investia has developed a fee-waiving program for its clients holding nominee accounts. As such, when you hold \$25,000 or more of funds of IA Clarington Investments Inc., we will waive the nominee account administrative fees which would normally be charged to you. IA Clarington Investments Inc. will not provide additional compensation to Investia nor its representatives in connection with this fee-waiving program.

Compensation of representatives

We may compensate our representatives by a combination of one or more of the following:

- base salary;
- compensation based on the value and/or types of assets under administration;
- percentage of sales commissions and trailer fees received by Investia; and
- approved referral arrangements.

Fee-based accounts

Different products may have differing levels of compensation, and different account types (fee-based and transactional). To avoid duplicate fees being charged in fee-based accounts, products with embedded commissions will be excluded from your assets for the purpose of calculating fees.



Outside activities

At times, our employees, representatives, administrators, managers, associates or staff may participate in outside activities. Before engaging in any outside activity, our policies require these individuals to disclose situations where a conflict of interest may arise and to determine how such conflicts may be addressed. Investia's approval is required prior to engaging in the activity.

Gifts and entertainment

Our representatives, executives and employees are not permitted to accept gifts or entertainment beyond what we consider consistent with reasonable business practices and applicable laws. We set maximum thresholds for permitted gifts and entertainment to avoid any perception that the gifts or entertainment will influence decision-making.

Before engaging in any outside activity, our policies require these individuals to disclose situations where a conflict of interest may arise and to determine how such conflicts may be addressed.

Personal dealings with clients

To address these conflicts, Investia has policies and procedures in place which strictly prohibit personal financial dealings with clients who are not family members.

Referral arrangements

Referral arrangements may exist between Investia and other iA Financial Group members and/or other regulated or non-regulated entities. A referral arrangement happens when a prospective client is referred to or from Investia by a party and that party or Investia may receive a referral fee. The purpose of referrals is to introduce our clients or potential clients to qualified persons who are best suited to help clients achieve their financial objectives. Investia's due diligence of all approved referral arrangements includes consideration to any excessive referral compensation with comparable alternatives and to ensure that fees charged to clients are reasonable when compared to investments offered through Investia. If a referral arrangement is in place, a written disclosure will be provided to you explaining the specific details of the referral arrangement.

Leverage strategies

Borrowing money to invest ("leverage") is not suitable for all investors. Please review the risks and important factors outlined in the Relationship Disclosure Information Document prior to implementing a leverage strategy and discuss with your Representative whether or not it is appropriate for you. Given that the leveraged purchase of mutual funds may provide a financial incentive to the Representative, we address the potential conflicts inherent in the proposed leverage strategy by ensuring that the Representative complies with Investia's leveraging policy and we review all leveraged investments to ensure that it is suitable for the client and in their best interest.