

### **Trade Desk Hours of Operation**

In light of recent developments within the financial markets in Canada, we would like to take this opportunity to outline Assante Capital Management Ltd's policies with respect to trading equities.

We believe that this will have little to no impact on you, and it will not have any effect on mutual fund transactions.

Assante Capital Management Ltd. (ACM) has a carrying broker arrangement with National Bank Correspondent Network (NBCN), which acts agent on behalf ACM for all equities traded on the Toronto Stock Exchange (TSX) and other marketplaces.

Through our carrying broker NBCN, ACM's Trade Desk will provide to you and your financial advisor full order execution services between the hours of 9:30 AM and 4:00 PM, Toronto Time (hereinafter referred to as "EST"), during days on which the TSX is open for business (excluding statutory holidays).

While some marketplaces will provide order execution services outside the hours currently available on the TSX, ACM will not, as a standard, expand its hours due to concerns that, in the absence of adequate market liquidity, we may not, nor our carrying broker NBCN, be able to achieve the best order execution for our clients.

We cannot guarantee order acceptance or execution outside of our standard hours.

### **Primary Marketplace and Routing of Orders**

For securities listed on the TSX, which may also trade on one or more ATS (Alternative Trading System), the TSX will be designated as the principal marketplace at the time of order entry.

Unless otherwise agreed to by you and your financial advisor or authorized representative, the following policies will apply:

- All orders received by ACM prior to 9:30 AM EST will be released by ACM to NBCN to be entered onto the pre-opening of the TSX;
- Orders entered after 4:00PM will be flagged with the "AM" indicator and will not be released by ACM to NBCN until the pre-opening on the next business day.
- All orders received by ACM between the hours of 9:30 AM and 4:00 PM EST which are immediately executable (including market orders or limit orders within the bid/ask spread on a trading facility or marketplace) will immediately be forwarded to NBCN to be executed on the trading facility or marketplace which offers the best price for that order. During regular market hours NBCN achieves best price execution by using automated systems that will source the best price for the execution of a client order from the multiple Canadian marketplaces. All available markets are considered during the sourcing process including both visible markets and markets that offer no pre-trade transparency (Dark Pools); and
- All orders received by ACM between the hours of 9:30 AM and 4:00 PM EST which are not immediately executable (including limit orders outside the bid/ask spread) will be forwarded to NBCN to be entered on a transparent trading facility or marketplace in accordance with ACM's and NBCN's policies as established from time to time.

- ACM's financial advisors or authorized representatives may delay entering all or part of a client order on a trading facility or marketplace to achieve best execution if specifically requested by the client. This procedure will not be affected by the introduction of new trading facilities or marketplaces.
- For Overseas trades, NBCN will facilitate buys in overseas markets as long as they have a relationship with a registered dealer on that exchange. NBCN will sell securities in overseas markets on condition a) Securities must get sold on the market where the client bought it and b) A physical certificate has been fully deposited.

### **Market Orders**

All client orders which will result in immediate execution will be executed by NBCN on behalf of ACM on the trading facility or marketplace which displays the best price (or prices) available to our client. All such market orders received outside of the TSX's trading hours (or on a day when TSX is not open for trading) will be released by ACM to NBCN during the pre-opening of the next trading session of the TSX for that security.

### **Limit Orders**

A client limit order will be considered to be any order that includes a minimum sale price or maximum purchase price set by the client. Where such an order is received between the hours of 9:30 AM and 4:00 PM EST but is not immediately executable (the minimum sale price is below the best bid or the maximum purchase price is above the best offer), the order will be entered in accordance with ACM's and NBCN's policies in effect at the time. Where a limit order is received outside of the hours of 9:30 AM and 4:00 PM EST or on a day when TSX is not open for trading, the order will not be released by ACM to NBCN until the TSX opens its regular trading (regardless of which trading facility or marketplace's order book will be utilized).

### **Special Terms Orders**

Special terms orders have specific, non-standard terms attached to them which are not executable on a regular trading facility or marketplace (i.e. orders with a non-standard settlement period). Unless otherwise agreed to by you and your financial advisor or authorized representative, ACM will communicate to NBCN to enter all such orders on the TSX. NBCN will make the determination if such orders are immediately executable on another trading facility or marketplace at the time the order is entered.

### **“Day Orders”**

**Unless otherwise agreed to by you and your financial advisor or authorized representative**, an unfilled “day order” on the TSX and not priced at the last trade price on the TSX will expire at the close of trading of the TSX which is currently 4:00 pm EST. However, if an order is priced at the last trade price on the TSX, the order will remain eligible for trading on the TSX until the extended trading session is over at 5:00 pm EST unless you have instructed your financial advisor to cancel the order. If, however, your order was initially booked on another trading facility or marketplace, the day order will expire at the close of trading for that facility or marketplace.

### **“Good ‘til Cancelled” Orders**

Client orders specified as “good ‘til cancelled” (“GTC”) will be entered and will remain on a trading facility or marketplace until they are executed or expire. Unless otherwise directed by a client, “good ‘til cancelled” orders shall reside on the TSX until they are executed or they expire. Our carrying broker will only allow the entry of orders with a 30 calendar-day maximum GTC. It is your responsibility as the client to ensure what the date of expiry will be and to contact your financial advisor on or before the order's expiry date should you wish to have the order re-instated.

## **“Stop-Loss” Orders**

Stop-loss orders will be entered in the order book of a transparent trading facility or marketplace in accordance with ACM’s and NBCN’s policies in effect at the time the order is received. The stop loss order will become an active order once the trigger price is achieved on the trading facility or marketplace on which the order is housed. Once triggered, NBCN will undertake, on a best efforts basis, to ensure that the best possible fill price is obtained taking all available trading facilities and marketplaces into consideration at the time.

## **“Fill or Kill” Orders**

NBCN will accept from ACM “fill or kill” orders but will only execute these orders on the understanding that they will execute the fills on the trading facility or marketplace which will provide the best price for our client. All trading facilities and marketplaces will be reviewed for “fill” opportunities before the order will be “killed.”

## **Market-on-Close Orders**

Currently the TSX is the only marketplace which offers a market-on-close (“MOC”) facility. All orders must be entered on the TSX’s MOC facility prior to 3:40 pm EST and will be executed at the calculated closing price for that security on the TSX. It should be noted that trading on the MOC facility will be executed at the same time as other trading facilities or marketplaces will be offering quotes on their visible order book and therefore ACM and NBCN cannot guarantee that the order will be executed at the best price.

## **Disclosure of Marketplaces on Trade Confirmations**

If a trade has been made on more than one marketplace, one trade confirmation will be issued identifying each marketplace the trade was executed, along with the quantity and price received on that marketplace.

## **Trading on a Specified Marketplace**

ACM and NBCN are subject to certain obligations to the Canadian equities market. NBCN is obliged to consider execution opportunities on all Canadian trading facilities and marketplaces for our clients and cannot accept instructions from ACM to trade on a specific trading facility or marketplace. NBCN is obliged to execute on behalf of ACM all trades at the best available price regardless of where such a price may be quoted.

## **Relationship with Alpha Trading Systems Limited Partnership**

Alpha Trading Systems Limited Partnership (Alpha) is an ATS operating in Canada offering a broad range of trading services and options. As part of NBCN’s regulatory obligations to secure best execution for all client orders, its parent corporation, NBF (National Bank Financial), is a subscriber to Alpha. Its automated trading systems probe Alpha’s available liquidity on all orders. NBF is a limited partner of Alpha and a shareholder of Alpha Trading Systems Inc., the general partner of Alpha, and also has representation on the Board of Directors of Alpha.

## **Questions**

Your Assante Capital Management Financial Advisor will gladly provide you with details should you have any questions or require further clarification.