HARBOURFRONT
WEALTH MANAGEMENT

Statement of Policies Regarding Related and Connected Issuers

Under certain circumstances we may advise you in respect of securities transactions where the issuer of the securities or the other party to the transaction is a corporation or party having an ownership or business relationship with us.

Since these transactions may create a conflict between our interests and yours, we are required by securities laws to disclose to you certain relevant matters relating to the transactions. When we trade in or advise with respect to securities of certain other issuers to which we are related or connected, we are required to do so only in accordance with particular disclosure and other rules. Those rules require us to inform you of the relevant relationships and connections with the issuer of the securities prior to trading with or advising you.

Issuers that are **related** to Harbourfront are those that, through the ownership of or direction or control over voting securities or otherwise, exercise a controlling influence over Harbourfront, or Harbourfront exercises a controlling influence over them.

Issuers that are **connected** to Harbourfront are those that have any relationship with Harbourfront or any of its related issuers, or any officers or directors of either, that may lead a reasonable prospective purchaser of the securities to question if we and the issuer are independent of each other in a distribution of the connected issuers securities.

Before we advise you with respect to the purchase or sale of any securities of a related issuer, or in the course of an initial distribution of securities of a connected issuer, we will disclose the relationship to you prior to giving advice.

Before entering into a contract for the sale or purchase of the securities of a related issuer, and before accepting payment in connection with any such trade, our relationship with the related issuer will be specifically disclosed to you.

If you have given us the authority to exercise discretion in the purchase or sale of securities for your managed account we will not exercise that discretion for the types of transactions described above unless we have disclosed the relevant relationship to you and you have given your specific written consent.

The confirmation which is prepared and sent to you for the trade of any securities of a related issuer will contain the required disclosure.

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Related Issuers:

Harbourfront has a relationship with the following issuers:

- Forsyth Private Real Assets Pool
- Laurier Private Equity Pool
- Percy Harris Global Equity Pool
- Rockridge Private Debt Pool
- Jaxton Park North American Equity Pool
- Brandsen Global Income Opportunities Pool
- WBY Private Markets Pool
- Birchmont Absolute Return Pool
- KJH Income Opportunities Fund
- KJH Strategic Investors Fund
- KJH Founders Fund
- KJH Opportunities Fund
- KJH Energy Partners Fund
- KJH Technology & Growth Fund
- KJH Senior Loan Fund
- KJH Fixed Income Fund

Connected Issuers:

Harbourfront has appointed National Bank Independent Network, a division of NBF Inc. (the "Carrying Broker") as its agent for trading, clearing and settling transactions with you. The Carrying Broker is affiliated with National Bank of Canada ("NBC"), and with Natcan Trust Company.

Harbourfront is a connected issuer with NBC by virtue of certain agreements entered into by Harbourfront and one of its major shareholders with NBC and two of its affiliates, National Bank Financial & Co. Inc. and National Bank Financial Ltd., the latter being a securities registrant, whereby NBC has agreed that certain payments will be made to Harbourfront and/or its major shareholder, so long as the Carrying Broker is the carrying broker for Harbourfront, for maintaining client investment loans with NBC, where a proportion of the loan proceeds are invested in NBC investment products and for generating revenues resulting from the purchase by Harbourfront clients of specified products and services of NBC or its affiliates.

Harbourfront has entered into strategic business relationships with Majestic Asset Management LLC, and HF Brandt Limited Partnership whereby the following funds are considered connected issuers:

- Penmore Balanced Portfolio
- Nova Institutional Asset Allocation Pool
- HF Brandt Limited Partnership

Harbourfront is also connected to the Cumberland and Galliant Funds listed below. Cumberland Private Wealth Management Inc., Cumberland Investment Counsel Inc., or NCM Asset Management Ltd. act as portfolio manager to each of the Cumberland Funds. Galliant Advisors LP acts as IFM and adviser to the Galliant Fund.

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- Cumberland Capital Appreciation Fund
- Cumberland Income Fund
- Cumberland International Fund
- Cumberland Canadian Equity Fund
- Cumberland Global Fund
- Galliant Equity Long/Short Fund LP

Harbourfront is connected to the NCM Funds & Kipling Funds as its affiliate NCM acts as the investment fund manager and principal distributor of these funds. An affiliate of Cumberland Private Wealth acts as portfolio manager or sub-advisor to each of the NCM or Kipling Funds. A full listing and information about the NCM public mutual funds can be found on their website www.ncminvestments.com. For additional information on their pooled funds listed below, please contact your investment advisor.

Pooled Funds

- Kipling Strategic Income Fund
- Kipling Global Enhanced Dividend Fund
- Kipling Global Enhanced Growth Fund

If you have questions or require further information with regards to the relationship between Harbourfront and the above listed persons or companies, please contact us.

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