

# Relationship Disclosure Information

for your Managed Account with  
Silver Heights Capital Management Inc.



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## WHO WE ARE

Silver Heights Capital Management Inc. (“Silver Heights” or “we”) is a portfolio management firm with its principal place of business in Toronto, Ontario. Silver Heights was founded in 2006 by Kevin Kuebler and Lung-Ming Lam. Kevin and Ming are the two Portfolio Managers providing investment advice on behalf of the firm.

Silver Heights is a discretionary investment management firm focused on achieving superior, long-term risk-adjusted returns through a value-oriented, high-conviction, absolute return (benchmark agnostic) approach. Silver Heights employs a bottom-up, fundamentally-driven investment research approach. Silver Heights seeks to invest in high-quality businesses, only acquiring shares when prices are below our estimate of the intrinsic value of the business. When such investment opportunities arise, Silver Heights will take meaningful positions, building concentrated portfolios of stocks that can ideally be held for the long term. Silver Heights is focused on capital preservation while growing capital over time. We define risk as the risk of permanent capital impairment, and not the commonly-used notion of benchmark risk.

Silver Heights is registered as an adviser in the category of portfolio manager in most of the provinces of Canada (currently not in PEI or New Brunswick), as an exempt market dealer in Ontario, and as an investment fund manager in Ontario, Newfoundland and Labrador, and Quebec. The Ontario Securities Commission is its principal regulator.

## HOW WE WORK

Silver Heights offers its discretionary investment management services on a segregated account basis to private individuals, affluent families, single and multi-family offices and select institutions. A client’s accounts and related accounts are typically managed in aggregate as one pool of capital (“Managed Account”) rather than each account in the group being managed individually. Our minimum Managed Account size is \$5 million, but we may waive or lower minimum account sizes on a case-by-case basis. We also manage the investments of one or more pooled funds established, managed and advised by Silver Heights (collectively the “Silver Heights Funds”) and distribute units of these funds under various prospectus exemptions. We offer a single equity investment philosophy and generally do not tailor this philosophy to the needs of individual clients although Silver Heights may agree, upon client request, to specific investment restrictions. Silver Heights and the client will mutually determine if Silver Heights’ investment approach is appropriate for the client’s circumstances (please see “What You Should Know”, pages 4-6).

This disclosure document is intended for clients who have engaged, or are considering engaging, Silver Heights to manage their investments on a fully discretionary basis in a Managed Account and not those who have made direct purchases of units of one or more Silver Heights Funds.

### Account Agreement Documentation

The operation of your account with us is governed by the managed account agreement (“Managed Account Agreement”) entered into between you and us, which includes your investment policy statement (“IPS”). Information referred to as know-your-client information that we collect from you is used to create and develop your Managed Account Agreement and IPS.

Once we have established a Managed Account for you, we will manage your account on a discretionary basis, which means we have the ability to determine the securities to be purchased or sold for each client account. We exercise this discretion in a manner consistent with your IPS and considering your investment objectives.

## **Fees and Expenses**

### **Operating Charges – Management Fees**

Silver Heights receives a management fee in consideration for the advisory services provided to its clients. Management fees are payable monthly, in arrears, based on the month-end market value of the Managed Account and are pro-rated on a daily basis for certain cash flows and for the month a Managed Account is opened or terminated. Management fees are deducted directly from each client's Managed Account.

Appendix A to your Managed Account Agreement with Silver Heights establishes the management fee applicable to your Managed Account. Where investment management fees are charged by Silver Heights directly to a series of units of a Silver Heights Fund held by a Managed Account, no additional investment management fees will be charged to that Managed Account with respect to those assets.

### **Other Fees and Expenses**

In addition to the management fees described above, clients generally will incur other direct third-party trading and account related expenses, which will include brokerage commissions, custodial charges, costs associated with foreign exchange transactions and other transaction costs, taxes and duties, in connection with the implementation of their investment management strategy.

Fees and expenses directly reduce the return that a Managed Account could have otherwise earned. Investment returns earned, retained and reinvested by a Managed Account can compound to generate incremental earnings on previous earnings. Paying fees and expenses reduce the amount of capital a Managed Account can invest in securities or funds, thereby decreasing any potential benefit of compounding investment returns.

## **Account Statements**

### **Statements from Silver Heights**

Silver Heights provides quarterly account statements to its clients. These reports include a portfolio statement showing the holdings of the client's account at the end of the quarter and, for clients of greater than one year, reporting of the performance over specific periods and since inception. Silver Heights provides an annual statement detailing all management fees from your Managed Account.

### **Statements from the Custodian**

Clients also receive statements directly from the custodian of their accounts. These custodian statements are sent monthly for any month in which there is a transaction in the account. The custodian will also provide an annual statement detailing all charges from your Managed Account over the year. The custodian statements include:

- (1) Information about each transaction conducted for you during the time period covered by the statement (including the date of a transaction, whether the transaction was a purchase, sale or transfer, the name of the security, the number of securities, the price per security and the total value of the transaction).
- (2) Information about each security held (including the number of shares held, the cost of those shares and the market value as at the statement date) and the cash balance in your account at the end of the time period covered by the statement.

We encourage you to compare the statements that you receive from us with those from the custodian to ensure accuracy and consistency.

## **Qualified Custodian**

Client assets are held in Canada in a fully disclosed, segregated account at National Bank Independent Network (“NBIN”, the “Custodian”) which is acting on behalf of National Bank Financial (“NBF”), a wholly owned subsidiary of National Bank of Canada. NBF is a member of, and is regulated by, the Investment Industry Regulatory Organization of Canada (“IIROC”) with its principal place of business in Toronto, Ontario.

NBIN is a member of the Canadian Investor Protection Fund (“CIPF”) and client accounts held at NBIN are provided with CIPF coverage in an amount up to \$1,000,000. You can find more information on conditions and limits at [www.cipf.ca](http://www.cipf.ca).

NBIN is a qualified custodian under applicable securities laws.

Silver Heights has trading authority over client assets held at NBIN, but does not have access to client assets held at the Custodian and is not authorized to transfer securities or cash into or out of client accounts held at the Custodian, except to debit client accounts monthly to pay its management fees. NBIN is independent of Silver Heights, is required to segregate client assets from its own assets and is subject to regulatory oversight, minimum capital and insurance requirements. NBIN may hold securities on behalf of the client in its name, as nominee of the client. NBIN may appoint sub-custodians to hold client assets in foreign jurisdictions or to hold client assets other than cash or securities.

There are risks associated with the custody of assets. Client assets are subject to risk of loss:

- (i) if the Custodian becomes bankrupt or insolvent;
- (ii) if there is a breakdown in the Custodian’s information technology systems; or
- (iii) due to the fraud, willful or reckless misconduct, negligence or error of the Custodian or its personnel.

Silver Heights has reviewed the Custodian’s reputation, financial stability, relevant internal controls and ability to deliver custodial services and has concluded that the Custodian’s system of controls and supervision is sufficient to manage risks of loss to client assets in accordance with prudent business practice.

## Relationship with the Custodian

Under a services agreement with Silver Heights, NBIN provides a number of services to our clients. Clients of Silver Heights also have a direct relationship with NBIN which they enter into by completing NBIN account opening documents. Both Silver Heights and NBIN have responsibilities to clients of Silver Heights. Our responsibilities are described in this document and in the Managed Account Agreement that you enter into with us.

NBIN provides the following brokerage and custodial services for your Managed Account(s):

- Establish and maintain account(s) in the name of the clients of Silver Heights subject to the completion of approved documentation by the client.
- Provide custodial services in respect of securities held by the clients.
- Trade and clear securities on such securities markets or over-the-counter markets as directed by Silver Heights.
- Charge interest on margin account debits and credit interest on free credit balances for accounts of clients of Silver Heights, according to an interest rate structure set by NBIN.
- Act as Qualified Intermediary on behalf of Silver Heights with respect to processing of certain U.S. withholding taxes.
- Issue account statements to clients as described previously under the sub-heading “Statements from the Custodian”.
- Both Silver Heights and NBIN are responsible for ensuring that clients receive complete and accurate information in their statements.
- Issue all tax receipts for clients of Silver Heights.

## WHAT YOU SHOULD KNOW

### Obligation to Assess Suitability

As a portfolio manager, unless you are not an individual and are a permitted client within the meaning of National Instrument 31-103 who has waived our suitability requirement, we have an obligation to assess whether the investments we make for your account are suitable for you having regard to your particular circumstances. We are also required to act in your best interests, given the discretionary nature of your account. To meet this suitability obligation, we collect information from you at the time you open an account with us and we are knowledgeable about the investments that we make for you. In addition, in order to allow us to assess suitability on an ongoing basis after you open your account, we ask you to update your information periodically. If there have been any updates to your information or the information contained in your IPS, please contact us immediately. In cases where suitability has been waived, we may collect less information from you, and do not have the requirement to schedule periodic updates, however, we ask that you keep us informed of any changes so that the information we have about you is accurate.

## Annual Review Meeting

Silver Heights generally meets with clients annually to review the performance of their investments, discuss portfolio holdings and to update client information. Where a non-individual permitted client has waived suitability, the frequency and nature of our update meetings may vary. However, we encourage all clients to reach out to us if they have a question or would simply like to chat about investing or their account with us. We are always happy to connect with our clients.

## Collection of KYC Information

Silver Heights must collect certain information about our clients so that, among other things, we understand our clients' financial objectives and goals and personal and financial circumstances. We need this information about you, so we can manage your assets in accordance with your financial objectives and make decisions that are suitable for you. We ultimately need to understand whether our method of investing is suitable for you and your financial needs.

The information we collect is referred to as know-your-client ("KYC") information and will be collected via our account opening procedures and during meetings and other communications with us, including on an ongoing basis.

To allow you to open an account with us, we ask you to provide us with the following KYC information:

- (a) Your intended use of the account: this describes your purpose for investing (e.g., retirement savings, education, capital reserve, etc.).
- (b) Your investment experience: this provides insight into your experience with investing and various financial investments.
- (c) Your investment knowledge: this reflects your understanding of investing, investment products and their associated risks, and the advice we provide in making investment selections.
- (d) Your approximate income: this should represent annual income from all relevant sources (employment, investments, pension, etc.).
- (e) Your approximate net worth: this is your estimated liquid assets plus fixed assets less estimated liabilities.
- (f) Your liquidity needs: this is your need to access all or a portion of your investments to meet your ongoing and short-term expenses and financial obligations or fund major planned expenditures.
- (g) Your investment time horizon: this is the period from the time of investment to when you will need to access a significant portion of the money in your account.
- (h) Your investment objectives: these are the results you want from your investments, and should relate to the type of investments that will be purchased and/or have been purchased by you.

- (i) Your risk profile: this is your willingness to accept risk and your ability to withstand declines in the value of your portfolio.

Risk means different things to different people and we need to understand your tolerance to different types of risk such as:

- (i) volatility or short-term fluctuations in the value of your investments,
  - (ii) possibility of permanent loss / permanent capital impairment,
  - (iii) returns varying from a chosen benchmark,
  - (iv) inadequate or timing mismatch of returns to meet requirements for cash.
- (j) Your Reporting Insider Status: this tells us whether you are an insider of a reporting issuer or any other issuer whose securities are publicly traded.
- (k) Whether you are using leverage or are borrowing to finance the purchase of securities.

We also have to establish the identity of all clients. For a client that is an entity, we must establish the nature of the entity's business and the identity of beneficial owners.

## Privacy of Your Information

Silver Heights protects your privacy and the confidentiality of your personal information that we collect, store and use.

A copy of our Privacy Policy was provided to you as part of your Managed Account Agreement and you consented to the collection and use of this information at that time. The Privacy Policy specifies: how we define personal information, how and why we obtain your personal information, how we protect your information, how we communicate with you, and asks you to reach out to our Privacy Officer if you have any questions or concerns or simply would like to validate the accuracy of the information we have. If you would like another copy of this Privacy Policy, please let us know.

## Risks

You should carefully consider whether a Managed Account with us is appropriate for you in light of your experience, investment time horizon, objectives, financial resources and other relevant circumstances. You should understand the nature of our relationships, the way we manage your accounts and the extent of your exposure to risk. If you have any questions or concerns about the risks associated with your investments, or the appropriateness of those risks given your specific circumstances, please contact us immediately. Some of the significant investment risks associated with investing with Silver Heights are:

### "Long-Only" Investment Style

Although Silver Heights may modify its investment program in response to market conditions, it is nonetheless anticipated that client portfolios generally will invest on a "long-only" basis in a limited number of stocks selected by Silver Heights. This is in contrast to certain alternative investment programs that may also sell certain stocks short and/or establish a "market neutral" position (having neither a long nor a short bias), and/or otherwise "hedge" portfolios, which will carry different



investment risks and benefits than a long-only program. As a result of Silver Heights' long bias, clients may be more exposed to losses than a long/short or market neutral program in times of general market downturns and declining prices of equity securities, individually and generally.

## Fundamental Analysis

Silver Heights seeks to measure the intrinsic value of the securities that it purchases for its clients by considering various economic and financial factors from a variety of sources to determine if the security is underpriced or overpriced. In contrast to technical analysis and other alternative analytical methodologies, fundamental analysis does not attempt to anticipate broad market movements or trends, and focuses instead on seeking to ascertain the intrinsic value of specific securities and to identify mispricings that we believe indicate attractive trading opportunities. However, this presents potential risks, as fundamental analysis involves uncertainties, and is subject to error. Stock prices reflect what buyers are willing to pay and sellers are willing to accept, which will not always reflect the intrinsic value of the issuer. As a result, even when the fundamental analysis is sound, the price of a security could rise or fall as a result of overall market movements, sentiment, and macro-economic and other factors, although the fundamental economic and financial factors considered in evaluating its intrinsic value would suggest that the stock's price should rise.

## Concentration Risk

Silver Heights expects its client portfolios to be concentrated, holding investments in a limited number of underlying securities (typically 10-20 core positions in a mature account). Due to this concentration, a change to the market value of any individual security may have a greater impact on the value of a client's portfolio than if the client's portfolio were less concentrated.

## Equity Securities

Silver Heights expects that it will trade primarily in equity securities on behalf of its clients. Common stock and similar equity securities generally represent the most junior position in an issuer's capital structure and, as such, generally entitle holders to an interest in the assets of the issuer, if any, remaining after all more senior claims to such assets have been satisfied. Holders of common stock generally are entitled to dividends only if and to the extent declared by the governing body of the issuer out of income or other assets available after making interest, dividend and any other required payments on more senior securities of the issuer. The value of equity securities tends to fluctuate in response to specific situations for each company, industry and market conditions and general economic environments. The securities of smaller companies can involve more risk, their prices could be subject to more volatility and they can be less liquid (and, therefore, less capable of being monetized for the benefit of clients at a desirable time or price) than larger companies.

## Liquidity Risk

Silver Heights can invest in less-liquid securities for which limited trading takes place, which may include (among others) securities of small- to micro-cap companies, public companies whose shares are quoted on the "pink sheets" and traded over-the-counter, and privately-placed securities for which there may be no public market at the time of purchase. The time required to sell or acquire these less-liquid securities may be much longer than the time required to sell or acquire more liquid securities, making it more difficult to effect transactions in such securities at desired times and/or prices. Market values of less-liquid securities are potentially subject to greater volatility than the market

values of more-liquid securities. In some cases, the disposition of the securities will be dependent upon a subsequent event, such as their listing by the issuer or a major liquidity event (e.g., a sale of the issuer). In addition, Silver Heights may not be able to obtain the same quality and amount of research and public information regarding the finances and operations of the issuers of such securities, which could negatively impact Silver Heights' ability to assess the intrinsic value of such securities. Accordingly, investments in less liquid securities may expose clients to different or additional risk when compared to investments in the equities of larger public companies.

### International Securities and Currency Risk

Silver Heights currently invests primarily in Canada and the U.S., but may also invest in the securities of issuers located in other jurisdictions where we believe an attractive investment opportunity exists. Non-Canadian investments may be denominated in currencies other than the Canadian dollar. In addition to the factors which would normally impact the value of these investments if they were denominated in Canadian dollars, the value of these investments are also subject to changes in the currency exchange rates. The impact of changes in the currency exchange rates on the value of these investments, and on the value of a client's portfolio, may be significant. Although Silver Heights may determine to utilize derivative instruments to hedge against currency fluctuations in a particular case, we are not required to do so, typically have not done so, and there can be no assurance that such hedging transactions, if undertaken, will be effective.

### Market Risk

Silver Heights' opinions will sometimes differ from the views of the broader market and its investment decisions for clients will be based on its opinions. The value of a client's portfolio is directly related to the market value of the securities in their portfolio. The market value of the securities will fluctuate with: the financial performance of the issuer of the securities; the predominant views of the business and/or its prospects; general economic conditions; conditions in debt, equity, other securities or commodities markets; currency rates; political, economic or social developments; or instability in the relevant capital markets. Over the short to medium term, the value of the client's portfolio may experience very significant volatility. Individual securities, as well as the overall portfolio, may experience a very significant decline in value. In addition, if Silver Heights' expectations on the pricing of a security are not ultimately realized, clients could fail to realize profits on their investments in such securities, and could be exposed to significant losses.

### Portfolio Duplication Risk

Silver Heights does not publicly disclose all of its portfolio holdings given the nature of Silver Heights' concentrated investment approach. Since we hold relatively few names, we view our portfolios as our intellectual property. As we anticipate being net buyers of stock over the long term, we prefer not to discuss our holdings in the public domain to avoid any promotion of those names, as our goal is always to buy the next share at the lowest price possible. In our Managed Account Agreement, our clients agree not to disclose the holdings of, or activities in their Silver Heights accounts to any third party. Our clients further agree not to replicate or copy, in whole or in part, or contribute to the copying of, their Silver Heights portfolio, in any manner in the management or investing of any monies or accounts not managed by Silver Heights. However, Silver Heights cannot guarantee that the overall portfolio will remain proprietary. Attempts to mimic Silver Heights' proprietary portfolio, given its concentrated nature, could negatively impact Silver Heights' ability to purchase additional shares at the most favourable prices.

## Cyber Risk

Silver Heights, our clients and our service providers and other market participants increasingly depend on complex information technology and communications systems to conduct business functions. These systems are subject to a number of different threats or risks that could adversely affect us and our clients, despite our efforts and those of our service providers to adopt technologies, processes and practices intended to mitigate these risks and protect the security of their computer systems, software, networks and other technology assets, as well as the confidentiality, integrity and availability of information belonging to us and our clients. For example, unauthorized third parties may attempt to improperly access, modify, disrupt the operations of, or prevent access to our systems, our clients, our service providers, counterparties or data within these systems. Third parties may also attempt to fraudulently induce employees, clients, third-party service providers or other users of such systems to disclose sensitive information to gain access to the confidential data. In addition, these systems are susceptible to damage or interruption from computer viruses, network failures, computer and telecommunication failures, usage errors, power outages and catastrophic events such as fires, tornadoes, flood, hurricanes and earthquakes.

Although Silver Heights has implemented various measures to manage risks relating to these types of events, these systems could still become compromised, become inoperable for extended periods of time or cease to function properly. A successful penetration or circumvention of the security of such systems could result in the loss or theft of data or assets, the inability to access electronic systems, loss or theft of proprietary information or client or corporate data, physical damage to a computer or network system or costs associated with system repairs. Such incidents could cause Silver Heights to incur regulatory penalties or reputational damage, and Silver Heights or its clients to incur additional costs or financial losses.

## Risk of Using Borrowed Money to Finance an Investment

We do not lend money, extend credit or provide margin to our clients.

If at any time you use borrowed money to finance any part of a purchase of a security it is important to know that 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. Please let us know if you intend to borrow money to invest with us, so that we can discuss these risks with you.

## Temporary Holds on Accounts or Transactions

Silver Heights may place a temporary hold on transactions, withdrawals, transfers or an account where we have a reasonable belief that financial exploitation of a vulnerable client has occurred, has been attempted or will be attempted, or where there are concerns about a client's mental capacity to make decisions involving financial matters.

The placing of a temporary hold in these specific situations is an option for, but not an obligation of, Silver Heights. A temporary hold would only be placed in very unusual circumstances, after communication (or attempted communication) with the client to resolve the concerns, and where we reached the conclusion that there was no other better approach to protect the client, given the

situation. Where a temporary hold is placed, we will communicate this, verbally or in writing, to the client and provide our rationale for the hold. On a reasonably frequent basis, we will review the relevant facts to determine whether continuing the hold is appropriate and communicate the status of the hold with the client at least as frequently as every 30 days.

## **Investment Performance Benchmarks**

Silver Heights is benchmark agnostic, and its investment strategy does not track any index. Where we present index information in reports or in our quarterly letter to you, this is for reference only. Silver Heights' investment mandate results in portfolio composition that differs materially from any index.

## **Conflicts of Interest**

From time to time, we will be faced with conflicts of interest in providing our discretionary investment management services to clients. We will take reasonable steps to identify material conflicts of interests between us and our clients, and address such material conflicts of interest in the best interests of our clients. Additional information regarding material conflicts of interest between Silver Heights and our clients and how we address them is set out in our Conflicts of Interest Disclosure Statement that was provided to you in your quarterly package for Q2-2021 or, if you joined after June 30, 2021, when you opened your Managed Account with us. The most current version of this statement is also available on our website at [www.silverheights.com](http://www.silverheights.com).

## **Brokerage Practices and Use of Client Commissions**

Generally, unless otherwise agreed in a particular case, Silver Heights will be responsible for selecting the executing brokers to be utilized for client account transactions, and clients will not be permitted to direct Silver Heights' selection of such brokers. Silver Heights selects dealers for trade execution with the best interest of the client being the paramount consideration. Silver Heights seeks to obtain execution of transactions in a manner that achieves the best qualitative execution for clients while considering the full range and quality of a dealer's services including, but not limited to, the quality of research received, access to issuers, competitive commission costs, financial soundness and demonstrated execution capabilities.

Silver Heights directs the payment of commissions to dealers to affect transactions with the understanding that the dealer may apply a portion of these commissions towards research and other brokerage-related products and services. These products and services are part of the investment process and benefit all clients and will be limited to those that are permitted by applicable Canadian securities laws. These laws allow portfolio managers (such as Silver Heights) to pay for certain research and brokerage services with commission dollars generated by client transactions.

Silver Heights may derive substantial direct or indirect benefit from these research and brokerage services, particularly to the extent it directs "client commissions" to pay for research or other expenses which it would otherwise be required to pay. To the extent that Silver Heights receives the benefits of such services, a potential conflict of interest exists between Silver Heights' duty to act in the best interests of its clients and to obtain best execution, and Silver Heights' desire to receive the potential benefits of these research and brokerage services. This may give Silver Heights an incentive to select certain brokers to execute client transactions, based upon the other research and brokerage products and services that they provide. In the last fiscal year, Silver Heights has acquired research reports

including information on individual companies, industries and the economy, discussions with research analysts, meetings with corporate executives and attendance at industry conferences with the brokerage commissions generated by its clients. In connection with its utilization of these benefits, Silver Heights has made a good faith determination that the commissions paid to the broker providing such benefits are reasonable in relation to the value of the services provided by such brokers.

Silver Heights monitors trade execution and commissions paid on an ongoing basis to ensure that commissions paid are reasonable in relation to the combined value of research and brokerage services provided by the brokers-dealers. In addition, the Chief Compliance Officer and our Silver Heights portfolio managers meet semi-annually for a formal review of the commissions paid during the period.

## **Fair Allocation of Investment Opportunities**

Silver Heights has established policies intended to fairly allocate investment opportunities across client accounts, including any proprietary funds, with the goal of ensuring that all clients are treated fairly over time and that no client is systematically disadvantaged by the aggregation, placement, or allocation of orders. Investment allocations are determined, at the Managed Account level, prior to submitting the trade to a broker for execution. In certain circumstances, partial orders could be placed in advance of allocation determination where we think that this is in the best interest of the clients. Once an order is filled, the trades are processed into client accounts using the average price obtained on the entire order. In situations where an order for multiple clients is only partially filled, Silver Heights endeavours to distribute the securities purchased on a pro-rata basis between clients. Where a strict pro-rata allocation is not practical, orders will be allocated on a basis believed to be fair and equitable to clients over time.

## **Voting Client Securities**

Unless otherwise agreed in a particular case, clients authorize Silver Heights to exercise any voting rights attached to any of the securities in the client accounts that Silver Heights is managing pursuant to the terms of the Managed Account Agreement entered into between Silver Heights and the client. We have adopted policies and guidelines to ensure that proxies are voted in the best interest of clients. This will generally mean voting proxies with a view to enhancing the value of the shares or securities managed by Silver Heights. Clients generally may not direct specific proxy votes for the securities held in their accounts.

Clients may obtain a copy of Silver Heights' complete proxy voting policies and procedures and/or information about how Silver Heights voted any proxies on behalf of their account(s) upon request.

## **Complaint Policy**

Should you ever have any questions, concerns or complaints regarding your accounts at Silver Heights, we invite you to contact us. And while lots of organizations say this, we mean it. Pick up the phone, or send us an email. From the time of our inception, we have built Silver Heights with a focus on high-quality service. We have hand-picked a staff of exceptional people. We have developed a small and exclusive group of clients whom we value highly. And if things aren't right, we would like the chance to make them right.

If you have a complaint or a question about our services or a product, contact us. We will acknowledge your complaint and reach out to you for clarification or more information to help us resolve your complaint. We will do this as soon as possible and no later than five days after we receive it and will work with you to come to a resolution.

### Independent Dispute Resolution Service

If you are not satisfied with our resolution of your complaint, you may be eligible for the independent dispute resolution service offered by the Ombudsman for Banking Services and Investments (OBSI). If you are a Quebec resident, you may consider the free mediation service offered by the Autorité des marchés financiers.

You are eligible for OBSI's free and independent dispute resolution 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
- we do not provide our decision within 90 days after you made your complaint, or you are not satisfied with our decision.

You must file your complaint with OBSI according to its time limits below:

- 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.

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

OBSI's service is available to clients of our firm. However, 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 that there are time limits for taking legal action.

### Filing a Complaint with OBSI

Email: [ombudsman@obsi.ca](mailto:ombudsman@obsi.ca)

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

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

For more information about OBSI, visit [www.obsi.ca](http://www.obsi.ca).

## HOW TO REACH US

### Lung-Ming Lam

(416) 342-5626  
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### Kevin Kuebler

(416) 342-5625  
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### General/Main

(416) 342-5624  
[info@silverheights.com](mailto:info@silverheights.com)



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