

# CONFLICTS OF INTEREST STATEMENT



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We are required under CRO rules and securities laws to identify and have policies and procedures in place to address material conflicts of interest in your best interest. We must also disclose these conflicts of interest to you and explain how they might impact you and what we have implemented to address them in your best interest. Conflicts of interest may arise in a variety of circumstances, including where we may be influenced to put our interests ahead of your interests, and may arise:

- Between you and our firm, as well as between you and your representative.
- Between you and other clients; we act for many clients and we must conduct our activities so as not to intentionally favour one client over another.

## ADDRESSING CONFLICTS OF INTEREST

Sightline Wealth Management LP (“Sightline”) has taken steps to identify existing and reasonably foreseeable material conflicts of interest that may exist between you and us and address them in your best interest. Our employees are familiar with our policies and procedures and are required to conduct their responsibilities in compliance with such policies and procedures.

Sightline may adopt one or more of the following measures or procedures when addressing conflicts of interest:

**CONTROL OF INFORMATION** - preventing or controlling the exchange of information between opposing sides of a conflict of interest, for example, by establishing a firewall.

**SEPARATE SUPERVISION** – ensuring that employees on opposite sides of a conflict of interest are supervised by different people.

**NEUTRALIZING FINANCIAL INCENTIVES** – removing the financial incentive of an employee to favour a particular product or service.

**REMOVING INAPPROPRIATE INFLUENCE** – preventing one employee from inappropriately influencing another employee where such influence could impair integrity or judgment.

**SEGREGATION OF TASKS** – controlling the simultaneous or sequential involvement of employees in separate tasks or services.

**DISCLOSURE AND CONSENT** – disclosing the conflict to you and obtaining your written consent to act.

**AVOIDING** – avoiding conflicts that cannot be addressed in your best interest.

The material conflicts we have identified and how these conflicts are addressed in your best interest are described below.

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## Trading or Advising Proprietary Products / Related and Connected Issuers

The principal business activity of Sightline Wealth Management LP is to trade securities on behalf of clients and provide investment advice in respect of these trades. In providing trading and advisory services to our clients it is important that our clients understand our interests in the service or transaction.

We must make certain disclosures where we (a) act as your dealer/ broker; or (b) advise you, with respect to securities issued by us, by a related issuer or, in the course of a distribution, by a connected issuer (collectively, “Proprietary Products”).

In these situations, we must disclose our relationship with the issuer of the securities. We must also make disclosure to you where we know or should know that, as a result of our acting as your dealer/broker, Proprietary Products will be purchased or sold by you through us.

The following is a list of the time and manner in which these disclosures must be made:

- Where we purchase or sell securities for your account, the required disclosure will be contained in the confirmation of trade and monthly statement, which we prepare and send to you.
- Where we advise you with respect to the purchase or sale of securities, the disclosure must be made prior to our giving the advice.
- If there is a significant change to the information previously disclosed to you, Sightline will notify you of the change in a timely manner and, if possible, before making the next purchase or sale of the securities for you or providing advice to you to purchase or sell the securities.

Securities regulation requires Sightline Wealth Management LP to disclose to clients whether any securities it recommends to clients to purchase or sell are Proprietary Products. An issuer is related to Sightline if, through the ownership of, or control over, voting securities or otherwise, the issuer is an influential securityholder of Sightline, Sightline is an influential securityholder of the issuer or if each of them is a related issuer of the same third party. An issuer is connected to Sightline if it has a business relationship with Sightline that, in connection with a distribution of securities of that issuer, may lead a reasonable prospective purchaser to question if the issuer and Sightline are independent of each other.

Ninepoint Partners LP (“Ninepoint”), an affiliated entity of Sightline Wealth Management LP, is an investment fund manager and portfolio advisor to the Ninepoint mutual funds, hedge funds and specialty products listed at [www.ninepoint.com](http://www.ninepoint.com). Each of the Ninepoint mutual funds, hedge funds and specialty products is a related

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and/or connected issuer of Sightline. We may advise you to invest in the Ninepoint mutual funds, hedge funds and specialty products, which is a potential conflict of interest given our relationship with Ninepoint.

To manage the conflicts inherent in making investment recommendations or taking investment actions for your account in related or connected issuers, we will only cause your account to be invested in securities of related or connected issuers, if we consider such securities to be suitable for your account and we consider that investing in such securities is in your best interest. Recommendations or investments made in securities issued by a related or a connected party are evaluated using the same process used to evaluate securities issued by a third party. We also ensure that our representatives are not compensated in a way that incentivizes them to recommend or cause your account to be invested in Ninepoint funds and products over non-related party funds and products that we make available to our clients.

### Referral Arrangements

To the extent that Sightline Wealth Management LP engages the services of, or invests in financial products offered by, another service provider, including our affiliates, in return for a referral fee, Sightline would be subject to a conflict of interest and could impose a risk and impact to you. Sightline ensures that it selects or refers another service provider to assist a client only if it is in the client's best interest. In addition, to the extent that any fees are to be paid by a service provider to Sightline as compensation for a client referral, Sightline and the service provider shall (i) disclose to the client the amount of the fees paid in connection with the referral; and (ii) obtain the written acknowledgement and consent of the client.

### Fair and Equitable Allocation

Sightline Wealth Management LP manages similar accounts for multiple clients and may be trading in the same security on their behalf at the same time. The potential for a conflict exists if one client is given preferential pricing or execution terms over another client. Sightline endeavours to allocate investment opportunities in a fair and equitable manner across client accounts. In summary, this process involves allocating purchases and sales of securities pro rata based on account value among accounts invested in similar strategies, subject to cash flow requirements such as subscriptions to and redemptions from the accounts.

### Roles with Multiple Entities

Officers or directors of Sightline Wealth Management LP may also be officers or directors of Ninepoint. Conflicts may arise as a result of the time commitment required by each role, and confidential client information received in one role. To address this conflict, both Sightline and Ninepoint have adopted policies and procedures that minimize the potential for conflicts of interest resulting from these relationships. All individuals are required to observe such policies in carrying out their duties. Each individual will have sufficient time in

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their work week to fully and properly discharge their responsibilities at Sightline and Ninepoint. In order to protect client confidentiality, each individual holding positions with multiple entities shall be prohibited from disclosing any confidential client information to any person other than the staff of the relevant entity or for the purpose of performing the relevant services for the client.

### Outside Activities

At times, representatives of Sightline Wealth Management LP may participate in outside activities such as serving on a board of directors, participating in community events or pursuing personal outside business interests, which could cause the representative to put such interest ahead of the interests of clients. Sightline has policies in place which require individuals to disclose situations where a conflict of interest may arise prior to engaging in any outside activity. Representatives of Sightline may only engage in such outside activities if approved pursuant to our policies. Additionally, most outside activities are required to be disclosed to securities regulators and securities regulators must be satisfied that the outside activity does not create a conflict of interest.

### Personal Trading

Employees of Sightline Wealth Management LP could use non-public information about you and the securities in your account for their personal trading. To address this potential conflict, we have an employee personal trading policy that requires employees to put the interests of clients ahead of their own personal interests. All personal trades by employees (other than exempt securities) are subject to an approval process. All account statements of employees and their family members who reside under the same household are reviewed monthly to ensure pre-approvals were obtained and to ensure compliance with the employee personal trading policy.

### Personal Dealings with Clients

From time to time, our executives and representatives may have additional relationships or dealings with our clients. Conflicts of interest can arise where an employee has personal financial dealings with clients, including the lending of money to or the borrowing of money from them, paying clients' losses out of personal funds, and sharing a financial interest in an account with a client. To address these conflicts, Sightline Wealth Management LP has policies and procedures in place which prohibit personal financial dealings with clients who are not family members and employees are not permitted to provide any different services or recommendations to clients whom they have personal relationships with than they would for unrelated clients.

### Gifts and Entertainment

The receipt of gifts and/or entertainment from third parties that are excessive or frequent may be a potential conflict. Employees of Sightline Wealth Management LP and members of their immediate families are not permitted to accept excessive entertainment nor gifts beyond a nominal value from third parties, including individuals, clients,

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brokers, trustees, banks, financial institutions or company representatives doing or seeking to do business with Sightline. We set maximum thresholds to avoid any perception that the gift or entertainment will influence such decision making. All employees are required to attest and disclose to our compliance team if they have accepted any gifts.

### Commission and Trailer Fees

Sightline Wealth Management LP may receive a commission or other forms of compensation (new issue or private placement commission/broker warrants) from the product manufacturer at the time of your purchase. Sightline may also receive an ongoing commission (known as a trailer or service fee) from the product manufacturer for as long as you hold the investment in your account. All information with respect to the fees and costs associated with you making and holding the investment and the compensation paid by the product manufacturer to Sightline is set out in the product manufacturer's offering document and disclose to prior to trade entry. Additionally, we ensure that we conduct due diligence on any products in which you may invest and make investment recommendations that are suitable for you and that we put your interests first.

### Transaction-based, Managed and Fee-based Accounts

We offer transactional accounts and charge a commission for each transaction made, and managed or fee based accounts where the monthly fees are charged as a percentage of the market value in your account. All fees and the method of calculation for a fee-based account are disclosed to you in the fee based agreement at the time of account opening. We regularly review whether a fee-based account is appropriate, given your circumstances and investment needs. Products with embedded commission will be excluded from your assets for the purpose of calculating fees.

### Compensation Arrangements

Our internal compensation practices are designed to ensure that employees, including Investment Advisors are not incentivized or influenced to make investments in your account in specific financial products, or services, including any specific account type.

The compensation that is paid to our employees is designed to put your interest first and to minimize any financial impact that could be imposed on you. It is comprised mainly of base salary and discretionary bonus. The criteria for a discretionary bonus depends, in part, on the level of sales (specific to Investment Advisors) but as well as other criteria, all designed to encourage compliant and ethical behavior of Investment Advisors and employees. Investment Advisors may receive commission payments based on revenue, however the commission is based on the results of a standard grid for all products and services recommended to you, in order to ensure they do not face the conflicts in respect of those recommendations made to you. Specifically, our Investment Advisors are

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not incentivized to make recommendations for Ninepoint Partners LP products distributed through Sightline Wealth Management LP over a third party product.