

## | RELATIONSHIP DISCLOSURE INFORMATION

The Securities Regulators require that we provide all clients with enhanced disclosure. We therefore provide you with the following information.

Beacon Hill Wealth Management Ltd. (Beacon Hill) is a privately owned, independent Adviser registered as a Portfolio Manager in British Columbia, Alberta, Saskatchewan, Manitoba, Ontario and Quebec. Beacon Hill is also licensed with the SEC in the US, and certain members of our firm may also be licensed with the Insurance Council of BC. We offer investment planning and investment advisory services to our clients both in Canada and the USA.

It is important to be aware of the potential for risk inherent in investing in the capital markets. Generally, investments are not guaranteed. Factors that may affect the value of your investments include general economic factors, market and business conditions, fluctuations in securities prices, interest rates, and foreign currency exchange rates, changes in government regulations, and catastrophic events. On a personal level, investment decisions should be based on what is appropriate for your circumstances. Beacon Hill makes an investment decision on your behalf by examining your financial circumstances, risk tolerance and your investment needs and objectives. Following this detailed analysis, Beacon Hill closely monitors your portfolio to ensure that your investment needs are being met.

Clients may or may not borrow to invest in their Investment Account. There are certain risks involved in using borrowed money to finance the purchase of a security. 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. Generally, one should only borrow to invest if:

- a) You are comfortable with taking risk.
- b) You are comfortable taking on debt to buy investments that may fluctuate in value.
- c) You are investing for the long-term.
- d) You have a stable income.

Conflicts of interest may arise or exist where an action or decision by us could benefit us or others at your expense. When faced with a conflict with respect to services provided its clients, Beacon Hill and its staff will exercise the business judgment of responsible persons uninfluenced by considerations other than the best interests of the clients of Beacon Hill.

We have policies and procedures in place to address how we handle conflicts of interest. We avoid conflicts prohibited by law and conflicts we cannot effectively manage. In all other situations, the interests of Beacon Hill's clients are placed above personal interests of the staff through the application of the highest standards of integrity and ethical business conduct, to ensure the fair treatment of clients of Beacon Hill at all times. We disclose information about conflicts to you so that, when you evaluate our recommendations and actions, you can assess independently whether conflicts are significant for you.

As governed by our Investment Management Agreement with clients, Beacon Hill is entitled to a management fee for managing your Investment Account. The following is the annual fee structure will apply for managing your Canadian domiciled accounts with Beacon Hill:

- For households with total Assets Under Management (AUM) <\$1mm, a flat fee of 1.25% will apply.
- For households with total (AUM) from \$1mm-\$5mm, a tiered cost structure will be applied:

AUM	COST
<\$1mm	1.00%
\$1mm-\$3mm	0.75%
>\$3mm	0.50%

- For households with total AUM >\$5mm, a flat fee of 0.5% will apply.
- For households with total Assets >\$10mm, a flat fee of 0.45% will apply.

Beacon Hill delivers a client statement to all clients at a minimum of once every three months. The statement contains the following:

- (a) the name and quantity of each security in the account
- (b) the market value of each security in the account
- (c) the total market value of each security position in the account
- (d) any cash balance in the account
- (e) the total market value of all cash and securities in the account.

Beacon Hill has an obligation to assess whether a purchase or sale of a security is suitable for all of its clients, prior to executing a transaction or at any other time.

The cornerstone of our relationship with you is our Investment Application Form (KYC Form) and Investment Management Agreement.

We are required to establish the following information before we open account for you:

- a) Your identity
- b) Whether you are an insider of a publicly traded company
- c) Your investment needs and objectives
- d) Your financial circumstances; and
- e) Your risk tolerance

Therefore, if there are any changes to your circumstances, please inform us.

## | What to do if you have a complaint

### **Filing a complaint with us:**

If you have a complaint about our services or a product, contact us at:

Beacon Hill Wealth Management Ltd.  
1133 Fort Street  
Victoria, BC  
V8V 3K9  
Attn: Dixie Klaibert, Chief Compliance Officer

You may want to consider using a method other than email for sensitive information.

### **Tell us:**

- what went wrong
- when it happened
- what you expect, for example, money back, an apology, account correction

### **We will acknowledge your complaint:**

We will acknowledge your complaint in writing, as soon as possible, typically within 5 business days of receiving your complaint. We may ask you to provide clarification or more information to help us resolve your complaint.

### **Help us resolve your complaint sooner:**

- Make your complaint as soon as possible.
- Reply promptly if we ask you for more information.
- Keep copies of all relevant documents, such as letters, emails and notes of conversations with us.

### **We will provide our decision:**

We normally provide our decision in writing, within 90 days of receiving a complaint.

It will include:

- a summary of the complaint
- the results of our investigation
- our decision to make an offer to resolve the complaint or deny it, and an explanation of our decision

### **If our decision is delayed:**

If we cannot provide you with our decision within 90 days, we will:

- inform you of the delay
- explain why our decision is delayed, and
- give you a new date for our decision

You may be eligible for the independent dispute resolution service offered by the Ombudsman for Banking Services and Investments (OBSI).

### **If you are not satisfied with our decision:**

You may be eligible for OBSI's dispute resolution service.

### **If you are a Québec resident:**

You may consider the free mediation service offered by the Autorité des Marchés Financiers.

### **A word about legal advice:**

You always have the right to go to a lawyer or seek other ways of resolving your dispute at any time. A lawyer can advise you of your options. There are time limits for taking legal action. Delays could limit your options and legal rights later on.

**Taking your complaint to OBSI:**

You may be eligible for OBSI's free and independent dispute resolution service if:

- we do not provide our decision within 90 days after you made your complaint, or
- you are not satisfied with our decision

OBSI can recommend compensation of up to \$350,000. OBSI's service is available to clients of our firm. 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 there are time limits for taking legal action.

**Who can use OBSI:**

You have the right to use OBSI's 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
- you file your complaint with OBSI according to its time limits below

**Time limits apply:**

- 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.

**Filing a complaint with OBSI:****Contact OBSI:**

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

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

**OBSI will investigate:**

OBSI works confidentially and in an informal manner. It is not like going to court, and you do not need a lawyer. During its investigation, OBSI may interview you and representatives of our firm. We are required to cooperate in OBSI's investigations.

**Information OBSI needs to help you:**

OBSI can help you best if you promptly provide all relevant information, including:

- your name and contact information
- our firm's name and contact information
- the names and contact information of any of our representatives who have been involved in your complaint
- details of your complaint
- all relevant documents, including any correspondence and notes of discussions with us

**OBSI will provide its recommendations:**

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.

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

If you have any questions about the information provided, please do not hesitate to contact us.