

CONFLICT OF INTEREST	ADDRESS BY	HOW CONFLICTS WILL BE ADDRESSED
Individuals registered with us may also be registered with another registered firm	Disclose Control Avoid	<ul style="list-style-type: none"> • These relationships are subject to legislative and industry regulatory requirements that impose restrictions on dealings between related registered firms and/or individuals that are dually registered with a related registered firm. Such restrictions are intended to minimize the potential for conflicts of interest resulting from these relationships. • We have adopted internal policies and procedures that supplement the regulatory requirements, including policies on privacy and confidentiality of information. • We may disclose to you certain outside business activities as required by our regulator.
We may permit certain individuals who are registered with us (including your investment advisor or account representative) to be employed by, participate in, or accept compensation from other persons or firms, outside the scope of his/her relationship with us.	Disclose Control Avoid	<ul style="list-style-type: none"> • These relationships are subject to legislative and industry regulatory requirements that impose restrictions on dealings between related registered firms and/or individuals that are dually registered with a related registered firm. Such restrictions are intended to minimize the potential for conflicts of interest resulting from these relationships. • We have adopted internal policies and procedures that supplement the regulatory requirements, including policies on privacy and confidentiality of information. • We may disclose to you certain outside business activities as required by our regulator.
Individuals may serve on a board of directors or take on other activities that could take time or attention away from your account	Avoid	<ul style="list-style-type: none"> • Securities legislation prohibits an individual from serving as a director of another registered firm that is not an affiliate of our firm.
	Control	<ul style="list-style-type: none"> • When an advisor or representative sits on a board of directors of a charity or undertakes other community activities in any substantive way, they are subject to regulatory guidance on the disclosure and approval of outside business activities
We have discretion or control over transactions in your account if it is a managed account or pooled investment fund	Disclose Avoid Control	<ul style="list-style-type: none"> • Regulations require that we disclose and obtain your specific approval to purchase related and connected securities when we have discretionary power to do so. • We are required by securities legislation to prohibit transactions where the individual advisor may have an interest or have influence or control. • When we have discretionary power to manage your account for you, regulations require that we disclose to you and obtain specific approval to buy securities of either related and connected companies or issuers for whom we are offering securities as syndicate agent.
We may sell you securities which we own (called principal trades) and profit by doing so.	Disclose	<ul style="list-style-type: none"> • We will tell you whether we acted as principal or agent for each transaction on the trade confirmation. • In the case of fixed-income securities we are required to provide you with a stated yield to maturity so you can assess the competitiveness of our pricing.
We engage in trading of securities for our own account (called proprietary trading)	Control	<ul style="list-style-type: none"> • We maintain information barriers between our corporate trading activities and wealth management advisory business. • Firm and employee trades are identified as such and client trades are given priority to firm and employee trades in accordance with industry "client priority" regulations.
We may receive compensation by trading destinations, including electronic communication networks, market makers and exchanges in connection with trades on markets we direct to such destinations through affiliates or directly.	Control	<ul style="list-style-type: none"> • Industry regulations dictate our best price and best execution obligations to you.