

Regulatory Disclosures

Dated December 9, 2022



TABLE OF CONTENTS

INTRODUCTION	2
DESJARDINS GLOBAL ASSET MANAGEMENT INC. STATEMENT OF PRINCIPLES ON CONFLICTS OF INTEREST	2
PERSONAL INFORMATION PROTECTION	7
HANDLING OF COMPLAINTS	10
FAIRNESS POLICY	13
DECLARATION OF RISK	15

INTRODUCTION

This document is intended to provide clients with all the information they would consider important about their relationship with **Desjardins Global Asset Management Inc.** (“DGAM”), as required under section 14.2 of *Regulation 31-103 respecting Registration Requirements, Exemptions and Ongoing Registrant Obligations* (“Regulation 31-103”).

DGAM is an indirect wholly owned subsidiary of the Fédération des caisses Desjardins du Québec (the “Federation”). Its head office is located in Montreal, in the province of Quebec, where it is registered in accordance with the applicable securities legislation as a portfolio manager, investment fund manager, exempt market dealer and derivatives portfolio manager. DGAM is also registered, with non-resident status, as a portfolio manager and/or an investment fund manager and/or an exempt market dealer and/or an advisor in the following provinces and territories: Alberta, British Columbia, Manitoba, Nova Scotia, Saskatchewan, New Brunswick, Newfoundland and Labrador, Northwest Territories, Nunavut, Prince Edward Island and the Yukon. In Ontario, DGAM is registered as a portfolio manager, an investment fund manager, an exempt market dealer and a commodity trading manager. DGAM is regulated by Autorité des marchés financiers du Québec (“AMF”). DGAM is also registered as a “Securities Company” with the Financial Services Commission in Barbados.

On September 1, 2021, DGAM acquired the Montreal management firm Hexavest, which specializes in global equity and emerging market investment strategies, to strengthen its asset management expertise.

DGAM offers its portfolio management services and products under discretionary and non-discretionary management agreements to institutional clients (“clients”).

DGAM offers its clients a range of asset classes on public and private markets. Investment solutions include:

- Active and passive portfolio management of fixed income and common equity securities on Canadian, global and emerging markets
- Strategic and tactical asset allocation
- Systematic, quantitative and neutral market strategies
- Management of managers: selection and monitoring of external managers for specific mandates
- Investment in infrastructure and real estate

In all its investment approaches, DGAM includes environmental, social and governance (ESG) criteria in its analytical processes. In addition, DGAM's portfolio managers work with DGAM's responsible investment specialists to select securities based on ESG criteria.

This document is updated regularly. It is available on the DGAM website at:

<https://www.desjardins.com/ca/business/investment/global-asset-management/>.

Business relationship managers must provide a copy of this document at least once a year when they meet with their clients. The information thus communicated:

- a) Is highlighted and written in a precise, clear and explicit manner for clients
- b) Explains conflict of interest and its possible effect on the services provided to clients

You can also ask your DGAM representative at any time to mail you a copy.

DESJARDINS GLOBAL ASSET MANAGEMENT INC. STATEMENT OF PRINCIPLES ON CONFLICTS OF INTEREST

1. Objective of this document

DGAM wishes to inform its clients of material conflicts of interest that may arise in the course of its business activities and of how they are handled in the best interests of its clients.

A conflict of interest arises when the interests of different parties, namely a client and DGAM or one of its representatives (directors, officers, partners, employees or agents) are incompatible or diverge.

DGAM takes reasonable measures to identify all material conflicts of interest. It assesses the level of risk associated with each conflict and avoids any situation involving a serious conflict of interest or a risk that is too great for its clients

or market integrity. In any other conflict of interest situation, DGAM ensures that appropriate measures are put in place to effectively control the conflict. As a rule, a conflict of interest is significant if it can reasonably be expected to influence the decisions of a client or those of DGAM or its representatives under the circumstances.

Through this Statement of Principles on Conflicts of Interest (the “Statement”), DGAM informs you of the nature and extent of any conflicts of interest that may affect the services it provides to you.

2. Conflicts of interest

Below is a description of the main situations in which DGAM may be in a significant conflict of interest and how it intends to deal with them. If any other material conflicts of interest are identified after the start of a business relationship, DGAM will notify you as soon as possible after they are identified.

2.1 Related products, issuers related or connected to DGAM

As part of its business activities, DGAM may purchase, sell or recommend products developed and managed by DGAM or its affiliates (related products) or by issuers related to or connected with DGAM on behalf of its clients, by exercising its discretionary power under discretionary management agreements.

DGAM's related products include private funds, mutual funds and exchange-traded funds offered by DGAM or its affiliates. Related products are generally considered to cause a conflict of interest that may influence the independence of a company or its representatives in assessing suitability and in acting in the best interests of clients.

An issuer that distributes securities is deemed “related” to DGAM if, due to ownership of the securities, its influence or its control over voting securities, DGAM exercises control over this issuer, this issuer exercises control over DGAM, or a third party exercises control over both the issuer and DGAM.

An issuer that distributes securities is considered an “associated issuer” of DGAM if there is a relationship between this issuer and DGAM, another issuer linked to DGAM or a director, partner or officer of DGAM or of an issuer related to DGAM, which could lead a prospective investor to question DGAM's independence with respect to this issuer in the distribution of its securities.

To limit any such conflict of interest, DGAM discloses its relationships with related and connected issuers to its clients (see the section *Disclosure of issuers related or connected to DGAM* below). DGAM will communicate this information only in accordance with applicable regulations.

In managing its clients' discretionary accounts, DGAM may retain the services of other dealers or advisors to which it is related or connected. In addition, DGAM may, in accordance with applicable regulations, buy, sell or make recommendations, as the case may be, in respect of:

- a) Securities that a person in its group owns
- b) Securities in which DGAM or a person in its group invests
- c) Securities of a related or connected issuer
- d) Securities of an issuer with a director, officer, partner, employee or agent of DGAM or Desjardins Group as its director, officer, partner, employee or agent of DGAM or Desjardins Group

In the case indicated in paragraph (d) above, DGAM will not carry out transactions involving such an issuer unless the client in question has been given advance notice and has expressly authorized the transaction in writing. Where applicable, DGAM will proceed in accordance with the regulations applicable to its operations and always in the interest of its clients.

DGAM manages such conflicts of interest as follows:

- It ensures that such purchases are made in accordance with market conditions and its clients' investment objectives
- It applies a product review process that considers various factors to determine whether these securities should be included in the DGAM service offering to clients

Disclosure of issuers related or connected to DGAM

The entities listed below may be considered as issuers related or connected to DGAM.

Caisses Desjardins: Members of the Fédération des caisses Desjardins du Québec and the Desjardins Ontario Credit Union Inc.

Capital Desjardins Inc.: A wholly owned subsidiary of the Federation, this company is responsible for issuing its own securities on capital markets and investing the proceeds in securities issued by Desjardins caisses.

Capital régional et coopératif Desjardins (“CRCD”): Investment funds whose investment fund manager and portfolio manager is Desjardins Capital Management Inc., a wholly owned subsidiary of the Federation. CRCD raises development capital through public offerings and invests the funds in cooperatives and businesses. Desjardins Trust Inc. is the custodian of CRCD.

Fiera Capital Corporation: A public company in which Desjardins Financial Corporation Inc., a wholly owned subsidiary of the Federation, holds an interest through Fiera Capital L.P. Fiera Capital Corporation is registered as a portfolio manager and investment fund manager. Fiera Capital Corporation acts as a portfolio sub-manager for certain Desjardins Funds.

Desjardins Capital SME L.P.: A limited partnership for which Desjardins Capital Management Inc., a wholly owned subsidiary of the Federation, acts as a general partner.

Desjardins Investments Inc. (“DI”): An indirect wholly owned subsidiary of the Federation. DI is registered as an investment fund manager.

DGAM BFC Energy L.P.: A limited partnership for which 12990644 Canada Inc., a wholly owned subsidiary of DGAM, acts as a general partner.

DGAM Infrastructures PEC S.E.C.: A limited partnership whose limited partners include Desjardins Holding Inc. and for which 12618117 Canada Inc., a wholly owned subsidiary of DGAM, acts as a general partner.

Fédération des caisses Desjardins du Québec (Federation): The cooperative entity responsible for strategic policy, oversight, coordination, treasury operations and development for Desjardins Group. It meets the financial needs of the caisses and other components of Desjardins Group. In this regard, it is mandated to provide institutional funds for the Desjardins network and to play a financial agent role, in particular by providing interbank exchange services, including the financial settlement of compensation.

Desjardins Trust Inc.: This indirect wholly owned subsidiary of the Federation is a trust company of Desjardins Group.

Desjardins Funds: A family of mutual funds for which Desjardins Investments Inc. is the investment fund manager and promoter. Desjardins Funds are reporting issuers. Desjardins Trust Inc. is the trustee and custodian of Desjardins Funds. DGAM is the portfolio manager of Desjardins Funds.

DGAM Funds: A family of investment funds focused on institutional clients, for which DGAM is the investment fund manager and portfolio manager. DGAM Funds are not reporting issuers. Desjardins Trust Inc. is the trustee and custodian of DGAM Funds.

DGAM Global Private Infrastructure Fund, L.P. and DGAM Global Private Infrastructure Fund II L.P.: Limited partnerships through which DGAM Global Private Infrastructure Inc. and DGAM Global Private Infrastructure II Inc., both wholly owned subsidiaries of DGAM, act as general partners.

Hexavest Funds: A family of investment funds focused on institutional clients, for which DGAM is the investment fund manager and portfolio manager. Hexavest Funds are not reporting issuers. RBC Investor Services Trust is the trustee and custodian of Hexavest Inc.

Fiera Capital Mutual Funds: A family of mutual funds for which Fiera Capital Corporation—a company in which Desjardins Financial Holding Inc., a wholly owned subsidiary of the Federation, indirectly holds a significant interest—is the investment fund manager and promoter. Fiera Capital Corporation is also registered as a portfolio manager and acts in that capacity on behalf of Fiera Capital Mutual Funds. Fiera Capital Mutual Funds are reporting issuers.

Desjardins Exchange Traded Funds (“ETFs”): A family of exchange traded funds for which DGAM is the investment fund manager and portfolio manager. Desjardins ETFs are reporting issuers. Desjardins Trust Inc. is the trustee of Desjardins ETFs.

NEI Funds, Northwest & Ethical Investments (“NEI Fund”): A family of mutual funds for which Northwest & Ethical Investments L.P. is the trustee and administrator. Northwest & Ethical Investments L.P. (NEI Investments) also acts as an investment fund manager and portfolio manager for certain funds. The Federation owns 50% of Northwest & Ethical Investments L.P. through its subsidiary Desjardins Financial Holding Inc. NEI Funds are reporting issuers. Desjardins Trust Inc. is the custodian of NEI Funds.

DIM Private Funds (“DIM Funds”): A family of investment funds for which Desjardins Investment Management Inc. is the investment fund manager and promoter. DIM Funds are not reporting issuers.

Desjardins Investment Management Inc. (“DIM”): An indirect wholly owned subsidiary of the Federation registered as a portfolio manager in Quebec, Alberta, Ontario, British Columbia, Nova Scotia, Saskatchewan, Newfoundland and Labrador, and New Brunswick, and as investment fund manager in Quebec, Newfoundland and Labrador, and Ontario for DIM Funds. DIM is also registered as a derivatives portfolio manager in Quebec. DIM Funds are only available to DIM clients in provinces where DIM is registered as a portfolio manager. DIM provides discretionary portfolio management and offers private investment pools and funds to its clients.

Aviso Wealth Inc.: A co-owned subsidiary of Desjardins Financial Holding Inc. and a partnership consisting of five provincial Credit Union Centrals and CUMIS, Aviso Wealth is a national integrated financial services company serving the wealth management needs of virtually all of Canada’s credit unions as well as a range of independent financial organizations. Aviso Wealth Inc. wholly owns NEI Investments.

Northwest & Ethical Investments Inc. (“NEI Investments”): A wholly owned subsidiary of Aviso Wealth Inc., NEI Investments is a mutual fund company registered as an investment fund manager and portfolio manager and acts as such for NEI Funds.

Desjardins Securities (DS): A wholly owned subsidiary of Desjardins Financial Holding Inc., itself an indirect wholly owned subsidiary of the Federation. DS is registered as a securities dealer and offers a full range of securities brokerage products and services. DS uses the trade name “Desjardins Online Brokerage” for its discount brokerage activities. Discount brokerage products and services are grouped under the trademark “Disnat.”

Desjardins Securities International Inc. (“DSI”): A DS subsidiary and brokerage firm registered with the Financial Industry Regulatory Authority (“FINR”) and the Securities and Exchange Commission (“SEC”).

Separate businesses

Potential conflicts of interest are minimized by the fact that, although Desjardins Group has an interest in the above-mentioned issuers, they all have separate operations, separate management and separate boards of directors that are formed independently. In addition, each entity has its own code of ethics and guidelines for managing conflicts of interest.

2.2 Conflicts of interest relating to the personal interests of DGAM representatives

DGAM representatives may find themselves in situations where their personal interests conflict with those of DGAM clients. For example, DGAM representatives may find themselves in a conflict of interest if they:

- Offer or receive gifts or entertainment that may compromise or be perceived as compromising their independence
- Conduct personal financial transactions with clients or exercise control over their finances outside the scope of their work for DGAM
- Participate in any outside business activity that would likely interfere with or conflict with their duties
- Carry out transactions in their personal account using confidential information concerning DGAM or their clients acquired in the course of their duties

The DGAM Code of Ethics and Compliance Manual establish, as a fundamental principle, that client interests must always take precedence over those of DGAM and its representatives. The Code of Ethics and the Compliance Manual also set forth standards that guide the conduct of DGAM representatives. These standards prohibit them from:

- Using the confidential information acquired in the course of their duties or taking advantage of a situation to obtain a benefit of any kind.
- Giving or accepting gifts, entertainment or compensation that could influence decisions to be made in carrying out their duties.

- Accepting compensation from any individual, outside of their relationship with DGAM, unless prior approval from DGAM is obtained.
- Engaging in outside activities that could interfere or conflict with their duties at DGAM.
- Completing personal financial transactions with DGAM clients who are not members of their family.
- Knowingly carrying out transactions in their personal accounts that conflict with the interests of DGAM clients.
- Engaging in any activity or holding an interest in any business or participating in any partnership that could hinder or appear to hinder their independence in judging what is in the best interest of DGAM clients. DGAM representatives must disclose to the clients concerned any conflict of interest and any personal interest in a security or other investment that may be reasonably expected to affect their ability to advise such clients objectively and impartially.

DGAM representatives must disclose to their employer any situation that may be reasonably expected to interfere with their duty toward their employer or their ability to provide objective and impartial advice. The outside professional activities of representatives must be approved by DGAM, which then assesses whether there is a conflict of interest along with the risks and the appropriate controls.

DGAM regularly reviews securities transactions carried out in the accounts of targeted representatives.

2.3 Referral arrangements

As part of its activities, DGAM may enter into referral arrangements with business partners, including ones that are members of the same financial group, Desjardins Group.

The terms of referral agreements will be set out in writing and be communicated to clients, by delivery of this Statement or otherwise, prior to the provision of services. The purpose of these disclosures is to enable clients to make informed decisions on recommendations and to assess potential conflicts of interest.

DGAM ensures that the written information relating to client referral arrangements is provided to each client concerned as soon as possible and no later than the thirtieth day before the next payment or receipt date of a client referral commission.

2.4 Transactions resulting in client brokerage commissions for goods and services provided by the broker or a third party

In accordance with the principles of best execution, DGAM may retain the services of a broker for securities transactions. However, DGAM may direct a broker to carry out transactions resulting in client brokerage commissions in exchange for order execution goods and services and research goods and services. These activities are governed by *Regulation 23-102 respecting Use of Client Brokerage Commissions* (“Regulation 23-102”).

The selection of a broker may create a potential or apparent conflict of interest, insofar as DGAM may direct these transactions to a broker providing goods and services directly or through a third party. DGAM has implemented the measures required under Regulation 23-102 to detect and resolve these conflicts of interest when they arise. To this end, DGAM ensures that the client brokerage commissions for securities transactions, including for order execution goods and services and research goods and services, provide the client with a reasonable benefit determined in good faith for all the transactions involved.

In addition, the applicable regulatory requirements are detailed in the *Brokerage Use Client Summary*, which is available on request.

3. Guidelines to reduce conflicts of interest

The activities of DGAM and its representatives are governed by a Code of Ethics, a Compliance Manual and procedures that constitute the framework for managing conflicts of interest at DGAM. DGAM representatives annually declare their compliance with the Code of Ethics and the Conflict of Interest Management Standard and must disclose any conflict of interest situations should they occur. A mandatory training program on detecting conflicts of interest has also been established.

DGAM ensures that fair and reasonable policies exist and are implemented to manage conflicts of interest specific to its management activities, such as fair allocation of securities, use of voting rights, compensation practices, confidentiality of information, trade allocation and best execution.

PERSONAL INFORMATION PROTECTION

1. Personal information protection

DGAM has adopted a personal information protection policy (“Privacy Policy”) that is part of the guidelines and rules established by Desjardins Group on the protection of personal information to ensure the confidentiality and protection of all personal information collected, held, used or communicated by Desjardins Group and its components. With this Privacy Policy, DGAM intends to establish specific rules for its particular areas of activity.

The Privacy Policy, whose broad lines are set out below, explains how DGAM protects personal information when providing investment services. It also describes the principles and measures implemented to protect personal information while carrying out its activities in Canada.

2. Purpose

In addition to being mindful of legal compliance, DGAM takes privacy very seriously and is committed to taking the necessary steps to ensure and maintain the accuracy, confidentiality, security and privacy of personal information. The adoption and enforcement of this Privacy Policy demonstrate this commitment and should help foster client confidence in DGAM.

3. Definitions

For the purposes of the Privacy Policy, the following terms have the meanings indicated below:

CLIENT

A person or an authorized representative who uses or intends to use, directly or indirectly, a DGAM investment product or service.

COLLECTION

An action by which DGAM obtains new information or confirms information already in its possession about a natural person.

CONSENT

Free and informed agreement to what is done or suggested. Consent may be express or implied. Express consent is given explicitly or unambiguously, either orally or in writing. Express consent is unequivocal and does not require the organization seeking a person's consent to make any inferences. Implied consent occurs when the actions or the inaction of a person make it reasonable to deduce that there is consent.

DESJARDINS GROUP COMPONENT

Any current or future legal entity that is part of Desjardins Group.

NOMINATIVE LIST

A list of names, addresses or telephone numbers of individuals, who may or may not have a common denominator.

DESJARDINS GROUP

The financial group that the Fédération des caisses Desjardins du Québec belongs to and which includes, but is not limited to, the Fédération des caisses Desjardins du Québec and its subsidiaries, the Desjardins caisse network in Quebec, Desjardins Ontario Credit Union Inc., and the Desjardins Security Fund. A subsidiary is any corporation, company or other group subject to the application of section 6.5 of the *Act respecting financial services cooperatives*.

INVESTMENT PRODUCTS AND SERVICES

These encompass but are not limited to financial services, including the services of derivatives portfolio managers, exempt market dealers, investment fund managers and portfolio managers.

PERSONAL INFORMATION

Any information about an identifiable individual or that allows the identification thereof, in any form whatsoever, which has been provided to DGAM by this individual, generated by a component of Desjardins Group, or collected from a third party in compliance with the Privacy Policy and applicable laws. Anonymized data is not considered to be personal information.

Personal information is considered sensitive if, due to its medical, biometric or other intimate nature, or the context of its use or disclosure, it entails a high and reasonable expectation of privacy.

THIRD PARTY

An individual or organization other than a Desjardins Group component.

4. Collection, use and communication

Subject to requirements set out in applicable laws, DGAM collects, uses and communicates personal information on clients in order to:

- a) **Provide** a client with the products and services purchased
- b) **Properly establish** a client's profile
- c) **Understand** a client's needs.
- d) **Determine** whether the products and services purchased by a client meet their needs
- e) **Recommend**, establish and manage products and services meeting a client's needs
- f) **Conduct** commercial activities
- g) **Meet** securities industry standards regarding the "know your client" rule
- h) **Adopt and apply** security measures, as required
- i) **Comply** with laws and regulations in general, where the latter require identity document information for the purposes of administering these laws, including the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act*
- j) **Comply** with foreign laws, as required
- k) **Detect** and prevent fraud

DGAM may use information related to an individual's investments for the purpose of informing the individual about other DGAM investment products and services.

An individual's personal information may be communicated to DGAM agents, subcontractors or service providers for services such as data entry, statement preparation or transmission, or claims processing. In such circumstances, DGAM prohibits the use of this information for purposes other than providing the services in question. These subcontractors and service providers must also agree to take all necessary measures to protect personal information when services are being provided. In cases where DGAM agents, subcontractors or service providers are located abroad, and even though DGAM requires contractual clauses governing the protection of clients' personal information, DGAM remains subject to the requirements of foreign laws that could legally force the disclosure of this information.

An individual's personal information may be shared with self-regulatory organizations that govern DGAM activities.

In accordance with applicable regulations and for the purposes permitted by such regulations, DGAM may communicate certain personal information about individuals to another Desjardins Group component. Disclosing such personal information may serve, among other purposes, to manage risks pertaining to the prevention, detection and investigation of fraud, money laundering and terrorist financing, as well as other related risks.

5. Retention

DGAM may, subject to applicable laws and in accordance with a retention schedule, retain in its files personal information about an individual, including that of a client or an authorized representative of a client, for as long as required for the above-mentioned purposes, even if the individual ceases to be a client or an authorized representative of a client.

6. Consent

Subject to exceptions provided or permitted by applicable laws, DGAM does not collect, use or communicate personal information for the purposes set out in the section *Collection, use and communication* without an individual's prior consent. This consent is given by individuals at various times when investment services are provided, in particular in account opening applications.

If DGAM collects personal information from or contacts third parties to verify or supplement personal information, it does so only with the prior consent of the individual and in accordance with applicable laws. Except in the above-mentioned cases, whenever DGAM communicates any information in accordance with the Privacy Policy, it records in its records, where it is reasonable to do so, the nature of this information, the date on which it was sent, and the identity of the third party or Desjardins Group component to which it was provided. Exceptions to this rule are personal information communicated for current operations, such as information sent to companies acting as agents for DGAM, as well as the statements and other documents produced for Revenu Québec, the Canada Revenue Agency, or their United States counterparts, data updated with the authority concerned, and communications with third parties concerning NSF cheques.

Subject to legal and contractual obligations, individuals may refuse to consent to the collection, use or communication of their personal information or may withdraw their consent at any time. If individuals do not want DGAM to collect, use or communicate their personal information for any purpose whatsoever, they need only contact their DGAM representative or make a request in writing. If individuals refuse or withdraw such consent, however, DGAM may not be able to provide or continue to provide them with certain products, services or information that are likely to interest them or that they have requested.

7. Nominative lists

DGAM may establish and share with third parties, or other Desjardins Group components, nominative lists for commercial or philanthropic prospecting purposes. Clients or their representatives may at any time ask DGAM or other Desjardins Group components to strike their name from such lists.

8. Depersonalized information

DGAM may use and communicate information for statistical, market analysis and segmentation purposes provided that the individual can in no way be identified and that no connection can be made between the individual and the information that is used or communicated.

9. Accuracy of information and right to correction

DGAM makes every reasonable effort to ensure the updating, accuracy and integrity of the personal information it holds. It is, however, the responsibility of each individual to inform DGAM promptly of any change of name or address or any other material change to be made to the personal information on the individual. If an individual believes that any personal information about them is wrong or inaccurate, DGAM encourages the individual to request access to their file so they can verify the accuracy of the information and make any necessary corrections.

10. Rights of access

Subject to applicable legal restrictions, individuals may at any time ask to be informed of the existence, use and communication of their personal information. To gain access to their personal information, they need only contact or write to their DGAM representative. For security purposes, individuals must provide proof of identity before gaining access to their personal information by demonstrating knowledge of specific personal information (date of birth, account number, etc.).

Upon receiving a request for access to information in writing, DGAM will communicate to the individual the information it holds on them within 30 days, unless an extension of this time period is provided under applicable legislation. If fees are required to retrieve the information, the individual will be notified in advance and may choose to withdraw the request or challenge the reasonableness of the fees.

Individuals with a sensory disability may, upon request, have access to their personal information in a format that allows them to read or listen to it, if such a format is available. If no such format is available, DGAM will convert the relevant personal information into the required format if it is reasonable to do so.

If an individual's request for access is denied, DGAM must, subject to applicable legislative restrictions, inform the individual in writing within 30 days of receiving the request of the reasons for denying the request.

11. Protective measures

To maintain client confidence, DGAM has reasonable measures in place to keep clients' personal information confidential, secure and private throughout its life cycle. Personal information protection safeguards are tailored to the sensitivity, quality, distribution and format of the information and how it is maintained in accordance with applicable internal policies and procedures.

DGAM employees must read the Privacy Policy and agree to comply with it and to respect the privacy of the individuals' personal information.

As mentioned above, subcontractors and service providers that do business with DGAM must agree to protect the confidentiality and privacy of personal information communicated to them for the purposes of providing services.

DGAM maintains substantial security measures to protect its computer systems. Only certain authorized persons have access to the internal DGAM facilities where personal information is received, processed or stored. Moreover, data systems and data processing procedures are subject to appropriate security measures such as passwords, data encryption, application and data bank access controls, firewalls, anti-virus systems and intrusion detection systems, which are continuously reviewed to ensure the security of operations and the confidentiality of processed data.

When DGAM deems that it no longer needs personal information for the purposes for which it was collected, it destroys or deletes the information in accordance with applicable laws and in accordance with DGAM's policies on data storage and disposal.

A personal information protection incident is any unauthorized access to personal information or any collection, use, communication, retention or disposal of personal information that does not comply with the applicable guidelines. DGAM handles all such incidents in accordance with applicable procedures. If it determines that a privacy incident poses a real risk of serious harm, the appropriate regulatory authorities and affected individuals are notified as soon as possible.

12. Complaints and recourse

DGAM has established a mechanism to handle complaints that concern, among other things, personal information. There are also various remedies available that are further described in the section *Handling of complaints below*.

13. Questions

Individuals may address any questions or concerns pertaining to personal information protection practices to DGAM at any time by simply contacting their DGAM representative or by making a request in writing.

14. Changes to the Policy

DGAM reserves the right to amend its Policy at any time. If applicable, updated versions of the policy will be posted on the Desjardins Group website at: <https://www.desjardins.com/ca/>.

HANDLING OF COMPLAINTS

1. Background

In collaboration with DGAM, the complaint handling team has established effective, fair and free complaint handling measures for DGAM clients that meet the quality standards set out by regulations. More specifically, the complaint handling team's role is to examine client complaints impartially and take all relevant facts into account.

Complaints may involve dissatisfaction regarding customer service or administrative procedures that has not been resolved to the satisfaction of DGAM clients, as well as breaches of confidentiality, theft, fraud, misappropriation or unlawful use of funds or securities, forgery, inappropriate investments, false or misleading information or unauthorized transactions, other unauthorized financial transactions and unauthorized activities outside of DGAM.

For any dissatisfaction concerning customer service, please contact your DGAM representative.

2. Filing a complaint with DGAM

Complaints can be submitted in writing to the following address:

Complaint Handling Team

100 Rue Des Commandeurs
Lévis, QC G6V 7N5

We recommend that your written complaint include details of the grievance, the alleged prejudice, and the requested corrective measure. If you are unable to submit your complaint in writing, you may contact a team advisor at 514-985-1883 or 1-877-985-1883 (toll-free).

You can also consult the AMF website, which provides the public with tools to facilitate the complaint handling process at <https://autorite.qc.ca/en/general-public/assistance-and-complaints/making-a-complaint>.

3. Steps following receipt of a complaint

The steps below will be taken once a complaint is filed:

- An acknowledgement of receipt will be sent within 5 business days of receiving your complaint
- Shortly after the confirmation is sent, a compliance advisor from the complaint handling team will contact you to discuss your file and make sure that you've submitted all the documentation required to review your complaint
- The compliance advisor assigned to your file will review your case
- After your file has been reviewed, a final response containing our findings and decision will be mailed to you within 90 days following receipt of the complaint
- If you receive a settlement offer, you must sign a release to accept it
- If you're not satisfied with the team's final response, see the list of other options for recourse enclosed with the confirmation and decision letters
- This process may not apply if there is a pending legal proceeding or if a ruling or settlement has already been reached regarding the allegations
- If the complaint handling team is unable to provide a detailed response within 90 days, they will contact you to let you know the reasons for the delay and when the review should be completed

You can request at any time that the complaint handling team forward a copy of your file to the AMF. You can also send your file directly to the AMF at the following address:

Autorité des marchés financiers

800 Square Victoria, 22nd Floor
P.O. Box 246, Tour de la Bourse
Montreal, QC H4Z 1G3

Notice to clients residing outside Quebec

Clients residing outside Québec may file their complaint with one of the following DGAM agents:

Alberta:

Field LLP

Daniel A. Downe
400-444 7 Avenue S.W.
Calgary, AB T2P 0X8
403-232-1754
dtdowne@fieldlaw.com

British Columbia:

Desjardins

Emily Caputo
401 West Georgia Street, Suite 1050
Vancouver, BC V6B 5A1

Manitoba:

MLT Aikins LLP

Mr. Brent C. Ross (Richmond J. Bayes)

360 Main Street – 30th Floor

Winnipeg, MB R3C 4G1

204-957-4681

bross@aikins.com

Nova Scotia:

McInnes Cooper

Barristers & Solicitors

David A. Graves

1300-1969 Upper Water Street

Purdy's Wharf Tower II

P.O. Box 730

Halifax, NS B3J 2V1

902-425-6500

david.graves@mcinnescooper.com

Ontario:

Desjardins Financial Security Life Assurance Company

Alexandra White

95 St. Clair, 7th Floor

Toronto, ON M4V 1N7

416-926-2700, ext. 5590033

Saskatchewan:

McDougal Gauley LLP

Ronald L. Miller

500-616 Main Street

Saskatoon, SK S7H 0J6

306-525-7200

rmiller@mcdougallgauley.com

New Brunswick:

Fédération des caisses populaires acadiennes limitée

Marc Roy

295 St. Peter Boulevard West

P.O. Box 5554

Caraquet, NB EW1 1B7

506-726-4000

marc.roy@acadie.com

Newfoundland and Labrador:

Benson Buffett

Jeffrey P. Benson

Atlantic Place, Water Street

Suite 900, P.O. Box 1538

St. John's, NL A1C 5N8

709-570-7224

jbenson@bensonbuffett.com

Nunavut:

Michael Chandler Law Office

Michael Chandler

Building 2416

P.O. Box 2021

Iqaluit, NU X0A 0H0

867-979-3505

mchandler@qiniq.com

Prince Edward Island:

Campbell, Lea, Barristers & Solicitors
Kenneth L. Godfrey
65 Water Street
Suite 400, P.O. Box 429
Charlottetown, PE C1A 1A3
902-566-3400
dlarsen@campbelllea.com

Northwest Territories:

Peter C. Fuglsang & Associates
Peter C. Fuglsang
4405 School Draw Avenue
P.O. Box 2459
Yellowknife, NT X1A 2P8
867-920-4344
fuglsang@ssimicro.com

Yukon:

Austring, Fendrick & Fairman
Lorne N. Austring
3081 Third Avenue
Whitehorse, YT Y1A 4Z7
867-668-4405
info@lawyukon.com

4. Other means of seeking compensation

You also have access to the following solutions:

AMF mediation services

After attempting to resolve a complaint with DGAM, any natural or legal person in Quebec can take advantage of the AMF's free mediation services by forwarding them a copy of the complaint file. Participation in this process is voluntary and requires consent from both the client and DGAM.

For more information on mediation services:

1-877-525-0337 www.lautorite.qc.ca
renseignementsconsommateur@lautorite.qc.ca

Legal action

You may also present your case in court.

Limitation periods: Please be aware that there are time limits established by law to pursue legal recourse. A lawyer can provide advice on your options and recourse. Once the applicable limitation period has expired, you may no longer pursue specific recourse options.

Preserving your file

As with any financial matter, you should keep a detailed file containing documents such as contracts and account statements. Document any steps you undertake to resolve your complaint and keep copies of letters, faxes, emails and notes taken during conversations.

FAIRNESS POLICY

DGAM must ensure fairness in allocating investment opportunities among its clients. The transactions carried out on behalf of its clients are executed under the best conditions with brokers and in an equitable manner for all its clients.

Transactions carried out for a number of clients on the primary and/or secondary market are allocated on a pro rata basis determined in advance and then executed under the best conditions. When orders are partially executed and the quantity is deemed negligible, the portfolio manager assigned to the account may reallocate the allocation to another client or remit it to the broker.

In the execution process, DGAM also considers other factors that can influence the choice of broker for a transaction, such as service quality, commission rate, reputation, financial responsibility and speed of execution. A periodic review is conducted of each of the brokers with whom DGAM deals.

DGAM must endeavour to be fair and reasonable with all its clients, taking into account their investment policy statement, and avoid conflicts of interest or favouritism among clients. When making investment decisions, the portfolio manager must determine if all clients with similar mandates, regardless of cash flow and portfolio allocation, should participate in the transaction to ensure that they all have access to the same investment opportunities.

DGAM has a procedure in place to ensure the fair allocation of securities obtained for a new issue, specifically when the quantity is lower than expected. In accordance with section 14.10 of the *Policy Statement to Regulation 31-103*, it indicates the method used to allocate:

- a) Price and commission among client orders when trades are bunched or blocked
- b) Block trades and initial public offerings among client accounts as part of its service offering
- c) Block trades and initial public offerings among client accounts that are partially filled, such as on a pro-rata basis

In some cases, a fixed-income securities transaction may apply to multiple mandates. In these cases, the allocation should be made and documented based on cash flow and the investment strategy (sector, term, return, etc.) of each mandate. If the portfolio manager needs to change the initial allocation following either a full or partial allocation, the reasons for the change must be documented and approved by the asset class lead.

If the initial quantity specified in the trade order is not received at the time of the trade, the quantity received must be allocated on a pro rata basis.

For actively managed mandates, each client will receive a pro-rated percentage of the filled order based on the client's percentage in the initial order. The securities will be allocated at the average execution price. In cases where an allocation doesn't follow the pro rata rule, the factors justifying the allocation must be documented and approved by the asset class lead.

For passive mandates, the portfolio manager must ensure that the portfolio weightings are in line with the index being replicated.

For new issues, the portfolio manager may determine a minimum allocation for each account before submitting the order. At the time of allocation, if the securities obtained for a participating account are below the minimum allocation threshold, the securities are divided among the other participating portfolios.

DGAM has not participated in the initial public offering and does not intend to do so. Should the activities change, the essence of this procedure will apply.

In its role as portfolio manager, DGAM is called upon to carry out transactions on behalf of its business partners and clients. Given its fiduciary role and the regulatory framework in which it operates, DGAM has a duty to regulate its trading practices. As a result, DGAM has a rigorous process for executing and monitoring stock and derivative transactions (futures, forward contracts, currencies, options, swaps) in order to comply with the principle of best execution.

DGAM is responsible for achieving the best possible result for all its partners and clients by acting fairly and honestly and taking into account the different variables that can influence the execution of transactions. DGAM must also ensure that its trading strategies are appropriate based on market conditions and must allocate transactions equitably among its clients' accounts.

DGAM has the authority to select the brokers by which the transactions will be executed and the rates to be paid for these brokerage services. The choice of a broker or counterparty must be made in the interests of the client, taking into account the factors listed above.

DGAM's trading teams have put in place best execution processes based on their respective needs and established checklists. These processes take into account the characteristics of the market and the nature of the products being traded can be used to demonstrate how the best execution principles are applied in their respective sectors.

DGAM reviews brokers or counterparties at least once a year to approve the list and establish an allocation budget for all asset classes traded. The criteria used may include the financial strength and reputation of the broker, ability and efficiency of execution, competency in block trading, price, speed and certainty of execution, overall transaction cost, access to underwriting and secondary market offerings, fairness in conflict resolution and quality of communication means and tools. DGAM also regularly monitors the results obtained by the various brokers with whom it deals in transactions made for clients.

Depending on the case, the overall transaction cost may include all costs associated with access to an order or the execution of a transaction that are the responsibility of the client, including costs arising from trading securities in a particular market; jitney fees, meaning any fees paid by one broker to another to provide trading access; and settlement costs.

The authorities expect DGAM to make reasonable efforts to use the mechanisms that provide information on orders and operations. Reasonable efforts include the use of information displayed by the information processor or, if there is no information processor, an information provider.

DGAM identifies all actual, potential or apparent conflicts of interest and communicates them to its clients via this document through the section *Desjardins Global Asset Management Inc. Statement of Principles on Conflicts of Interest* above, in accordance with the terms and conditions therein.

Certain conflicts of interest may involve confidential or commercially sensitive information, or information that can be likened to "privileged information" under the provisions of securities legislation governing insider trading. In these cases, DGAM must assess whether other methods exist to address the conflict of interest adequately.

Some conflicts of interest may also arise when DGAM uses the services of a broker for securities transactions. These transactions may result in brokerage fees, particularly for goods and services related to research ("soft dollars"). The handling of these potential or apparent conflicts of interest is described in the section *Desjardins Global Asset Management Inc. Statement of Principles on Conflicts of Interest* above.

DGAM employees also comply with the conflict of interest disclosure requirements prescribed by law, regulations, and any regulations of organizations overseeing their activities, and they must comply with any prohibition of action when there is a conflict of interest.

This policy may be revised from time to time to reflect changes in regulatory requirements and industry practices.

DECLARATION OF RISK

1. Background

Under *Regulation 31-103 respecting Registration Requirements, Exemptions and Ongoing Registrant Obligations*, the portfolio manager is required to describe the types of risks the client should take into account when establishing a new business relationship with DGAM. The manager is also required to disclose the nature and scope of the specific investment risks about which a reasonable investor would expect to be informed. This document outlines the investment risks identified by the manager for information purposes.

2. Nature of risks

The main risks associated with portfolio management, whether the investments are held directly or through a mutual fund ("fund"), are described below.

Any investment in securities may result in a capital loss due to its speculative nature. The risks associated with the strategies and methods used can increase during periods of speculative activity or unusual market volatility.

General risks related to markets and returns

There is no guarantee that the investment approach used will be effective or that the investment objectives will be achieved. Nor is there any guarantee that the investments in your portfolio or the funds will generate income or added value. Although the diversification and selection process used by DGAM is expected to mitigate risks, the portfolio or the fund may sustain considerable losses.

The value of your portfolio, like the net asset value of a fund, will fluctuate with general conditions prevailing on debt, equity and commodity markets, as well as with exchange rates and various political, economic and social situations, capital market instability and the financial performance of issuers of the securities that constitute or underlie the investments held by the portfolio or fund.

The success of any investment activity depends on the general economic situation, which can influence interest rates and volatility. It also depends on the volume of transactions and the time investors choose to invest in equity and other markets. Unexpected volatility or illiquidity on markets in which DGAM holds an interest may hinder its ability to achieve its objectives or cause it to sustain losses.

Despite the significant volume of transactions in securities and other financial instruments, markets for certain financial instruments have limited transparency and liquidity, which can be a disadvantage for DGAM in terms of obtaining the listed price and executing trades at the desired price.

If your assets are invested in DGAM Funds, it is important for you to know that these funds must comply with certain regulatory requirements but are not subject to all the disclosure obligations or regulations applicable to public mutual funds.

Income tax considerations

The after-tax return of an investment in a fund for an investor required to pay tax in Canada or internationally will depend in part on the composition of the distributions paid by the fund (which can be wholly or partially taxable or, in certain cases, constitute a non-taxable capital refund). The composition can vary over time, which influences the after-tax yield of your investments. The taxation rates applicable to the different types of income may also change following amendments to government policies.

Dividends and other distributions from securities in the portfolio, including deemed dispositions, may be taxable in Canada or internationally; the investor may not necessarily be able to deduct all or a portion of such tax from their local income or apply it to a foreign tax credit on their local tax expense.

Borrowing

DGAM may temporarily borrow money on behalf of DGAM Funds and clients, to meet redemption demands or settle portfolio operations. If the market falls before the securities can be sold to raise the liquidity to reimburse the loans, the net asset value of the portfolio or fund will decrease and the other investors will feel the impact. Based on your investment policy, DGAM has the right to contract debts backed by its assets and intends to exercise this right.

Illiquidity

Some securities may be illiquid because they are infrequently traded. As a result, there is no guarantee that the portfolio or fund will be able to liquidate such investments.

Currency

If your investment policy permits it, DGAM can use futures and foreign currency options as hedges against currency fluctuations. However, DGAM is not required to do so, and there is no guarantee that such hedges will be effective under the circumstances.

Custodian

Desjardins Trust Inc. is the Custodian of the portfolio assets of DGIA Funds except for the DGIA Market Neutral Fund pursuant to an agreement entered into with DGAM on May 24, 2013, and as amended on April 1, 2018. The Custodian performs this activity from its head office in Montreal. Desjardins Trust Inc. may use the services of sub-custodians, especially to facilitate trading in securities outside Canada, in accordance with Canadian securities legislation. DGAM Funds' portfolio assets are held in Canada by the Custodian or a sub-custodian, or outside Canada

by the Custodian or a sub-custodian, if appropriate, in order to facilitate the trading of DGAM Funds assets outside of Canada. As for DGAM clients, they use their own custodians.

RBC Investor Services Trust is the Custodian of the Hexavest funds pursuant to an agreement dated September 1, 2021, and the DGIA Market Neutral Fund pursuant to an agreement dated October 4, 2017.

DGAM has appointed State Street Canada as the Custodian of Desjardins ETFs to hold the assets and provide deposit and registrar services under an agreement entered into on March 23, 2017.

Risks related to margin transactions and counterparty risk

The portfolio or fund may be exposed to the risk of default by the counterparties with which the transactions are carried out.

If the securities provided to a broker to guarantee margin transactions lose value, the broker will issue a margin call. DGAM will then be required to deposit additional assets with the broker or another counterparty, or the securities given as a guarantee may have to be liquidated to offset the loss. In the event of a sudden drop in the value of its assets, the portfolio or fund may be unable to liquidate the assets quickly enough to reimburse the margin debt.

Short selling

If your investment policy permits it, DGAM may engage in short selling, which means selling a security not held by the portfolio or fund in the hope of subsequently buying the same security (or an exchangeable security) back at a lower price. To deliver the security to the buyer, the portfolio or fund must borrow the security then buy it back at a later date to return it to the lender. Short selling involves the risk of a theoretically unlimited increase in the price of a security.

Suspension of trading

Stock markets generally have the right to suspend or limit trading of any financial instrument. In the event of such a suspension, the financial instrument in question may not be liquidated and the portfolio or fund may thus sustain losses.

Financial leverage

If your investment policy permits it, DGAM can use financial leverage. Although financial leverage improves the chance of achieving a better return, it also increases the risk of loss. The risks associated with leveraging vary for each buyer according to their specific situation.

DGAM is not a lending institution and consequently does not grant its clients loans.

Derivatives

If your investment policy allows it, DGAM may invest in derivatives intended to hedge its interest in underlying markets so as to modify or reproduce the return of securities, commodities, interest rates, indices or specific markets with or without leverage.

Derivatives generally involve counterparty risk or the risk of losing all or part of the value of the investment, in particular because of the volatility of interest rates and credit risks and economic factors and activities on domestic and global markets. Derivatives can include substantial leverage that may considerably worsen the repercussions of market fluctuations and result in losses greater than the value of the investment. Derivative transactions are sometimes carried out over the counter or between dealers. Participants in these markets are generally not subject to regulatory oversight like participants in regulated stock markets. Unless otherwise indicated by your investment policy, nothing prevents DGAM from dealing with a particular counterparty or carrying out all its transactions with a single counterparty.

Limited ability to liquidate investments in DGAM Funds

Investors in a DGAM Fund do not have any public market for the shares offered hereunder and no market is expected to be created for that purpose. To redeem shares, the investor must complete and sign the redemption form and forward it to DGAM. DGAM Fund shares may not be transferred or resold. In addition, under the specific exceptional circumstances described in the Declaration of Trust, share redemption could be suspended for a certain period.

Potential effects of share redemption

Requests to redeem a significant volume of shares could require the Fund to liquidate its investments more quickly than desirable in order to raise the amounts required to fund the redemptions and achieve a market position that faithfully reflects a lower asset base. A drop in the value of the redeemed and outstanding shares may ensue.

Legislative amendments

There is no guarantee that Canadian or foreign laws, in particular legislation governing securities, investments and taxation, as well as the administrative policies and practices of governments and regulatory agencies will not be amended in a way that could adversely affect your investments.

Desjardins Global Asset Management Inc.

Contact us

Montreal area: 514-350-8686

Elsewhere in Canada and the US: 1-877-353-8686

