

## **TRADING OF CANADIAN LISTED SECURITIES – MULTIPLE MARKETPLACES**

Salman Partners and its affiliates (collectively “SPI”) have instituted certain procedures that may affect the manner in which Canadian securities trades are executed on potentially multiple marketplaces. This notice outlines these procedures:

Orders for Canadian-listed securities may be executed on the Toronto Stock Exchange (“TSX”), the TSX Venture Exchange (“TSXV”), various Canadian electronic marketplaces, on a foreign organized regulated market or in a combination of these markets.

SPI diligently pursues the execution of each client order on the most advantageous terms for the client. We execute each client order utilizing our market data sources to verify the best market for that order. Relevant considerations include but not limited to: the price at which the trade would occur, the speed of execution, the certainty of execution and the overall cost of the transaction. This diligence may require SPI to query other market participants of which we are not a participating member in order to ensure that we have assessed a best execution process for that transaction.

### **Default Marketplaces and Hours of Trading**

Unless notified otherwise by SPI, the Default Marketplaces for all securities listed on the TSX or TSXV, whether or not the security is also trading on other alternate marketplaces, will be the TSX or TSXV respectively. These exchanges operate between 9:30 am EST and 4:00 pm EST, Monday through Friday, not including statutory holidays in Ontario. There may be market delays, interruptions or closures outside of SPI’s control. All references to time in this document are references to Eastern Standard Time (including Eastern Daylight Savings Time).

### **Hours of Operation for Order Acceptance/Execution**

SPI Investment Advisors, trading staff and systems will be available for order execution during Default Marketplace hours. Staff may be available outside of Default Marketplace hours; however, SPI will not guarantee the ability to accept client orders and/or effect trade execution outside of the hours of 9:30 am to 4:00 pm EST.

### **Order Types and Handling**

Certain types of orders have specific handling implications in a multiple marketplace environment as follows:

- **Day Orders**  
Unless specifically agreed to between the client and the Investment Advisor/Trader, all order instructions are default handled by SPI as Day Orders. A Day Order is an order to trade that expires at the end of that trading day. Day Orders will be handled in accordance with the "Standard Order Routing Conditions" (see below). All Day Orders expire, if not filled in full, upon the close of the marketplace where the last portion of the order remains effective, unless otherwise agreed to between the client and the Investment Advisor/Trader.
  
- **Good Til Cancelled (Open) Orders**  
Open orders are orders that will remain valid until a specified date of expiry. These orders will be entered in the Default Marketplace if they are not immediately executable on an alternative marketplace at the time of entry. The order will remain in the Default Marketplace until executed or expiry, whichever comes first. Unless specifically agreed to between the client and the Investment Advisor/Trader, we will default handle all orders as Day Orders, not Open Orders.



- **Market Orders**

A Market Order is an order to buy or sell a security at whatever prices are available in the marketplace to help ensure a complete and full fill. Market Orders will be handled in accordance with the "Standard Order Routing Conditions". These orders are day orders unless specified otherwise.

- **Limit Orders**

A Limit Order is an order for a security at a specified price - minimum sale price or maximum purchase price - or better price. Limit Orders will be handled in accordance with the "Standard Order Routing Conditions". These orders are day orders unless specified otherwise.

- **Special Terms Orders**

Special Terms Orders are orders with specific terms that are not executable in the regular marketplace. Special Terms Orders will be executed by SPI's trading desk and will only be entered to the Special Terms Market of the Default Marketplace, unless they are immediately executable on an alternative marketplace at the time of entry. Special Terms Orders are day orders unless specified otherwise.

- **Stop Loss Orders**

Stop Loss Orders are orders that become limit orders when a standard trading unit is traded at, or superior to, the stop loss price on the marketplace in which the order has been booked. These orders will only be entered in the Default Marketplace order book, and will remain there until they order is executed or expires, whichever comes first.

### **Standard Order Routing Conditions**

All orders received for Canadian-listed securities will be routed to either the Default Marketplaces or alternative marketplaces as follows:

- (a) An order received prior to Default Marketplace opening (9:30 am EST) will be entered on the applicable Default Marketplace for execution on the opening. Orders received prior to the Default Marketplace opening will not route to an alternative marketplace unless agreed to between the client and the Investment Advisor/Trader;
- (b) An order received after the Default Marketplace close (4:00 pm EST) will be entered to the pre-opening of the Default Marketplace on the following business day. Orders received after the Default Marketplace close will not route to an alternative marketplace unless agreed to between the client and the Investment Advisor/Trader;
- (c) An order received during the Default Marketplace operating hours will be entered into the best market at the time of entry. The "best market" is the marketplace with the best bid (buy price) or best ask (sell price) or where SPI feels the order has the highest probability of being executed. This may be any marketplace that SPI has access to and/or can access for the purpose of best execution;
- (d) Any portion of an order that cannot be immediately filled will be entered on the Default Marketplace and will remain in the Default Marketplace order book until the order is filled, expired, changed or cancelled; and
- (e) Changes to an outstanding order, or portion of an outstanding order, will be handled the same as a new order received and will be treated according to routing conditions (c) and (d) above.

### **Foreign Organized Regulated Marketplaces**

Under certain circumstances, SPI may make a determination that, in order to achieve best execution, all or part of a client order must be transacted on a foreign organized regulated marketplace. In making this determination, SPI may consider factors which include but are not limited to:

- (a) The available liquidity displayed on a marketplace relative to the size of the client order;
- (b) The extent of trading in the particular security on the foreign organized regulated marketplace; and
- (c) The extent of exposure to settlement risk and/or fluctuations in foreign currency exchange.



**Extenuating Circumstances**

In the event of technical or other issues that limit SPI's access to specific marketplaces, orders received will be directed to any of the Default Marketplace or an alternative marketplace, including a foreign organized regulated marketplace, as circumstances warrant and as determined at the sole discretion of SPI.

**Disclosure of Marketplace and/or Average Price**

If an order is executed on more than one marketplace, the trade confirmation will contain the following or similar disclosure: "Traded on one or more marketplaces or markets, details available upon request".

If the order is executed at more than one price, the trade confirmation will contain the following or similar disclosure "Average price – details upon request".

Should you receive a trade confirmation containing one or both of the above disclosures, you may contact your Investment Adviser/Trader or SPI's Compliance Department to obtain at no charge full details regarding the trade(s).

**Amendments**

Changes to this policy may be made at the sole discretion of SPI and without advance notice. Changes will be posted to SPI's website at [www.salmanpartners.com](http://www.salmanpartners.com).

If you have any questions or concerns regarding our trading practices in multiple marketplaces, please contact your Investment Advisor/Trader.

