

1. Statement of Policies

Securities laws in certain provinces require securities dealers and advisors, when they trade in or otherwise advise with respect to their own securities or securities of certain other issuers to which they, or certain parties related to them, are "related" or "connected", to do so only in accordance with particular disclosure and other rules. These rules require securities dealers and advisors, prior to trading with or advising their customers or clients, to inform them of the relevant relationships and connections with the issuer of the securities. Clients and customers should refer to the applicable provision of these securities laws for the particulars of these rules and their rights or consult with a legal advisor.

Generally speaking, a "related" issuer is a person or company who influences, or is influenced by, a securities dealer or advisor.

A "connected" issuer is an issuer or one of its related issuers which has any indebtedness or other relationships with a securities dealer or advisor or one of its directors, officers or partners or related issuers which is likely to be important to a prospective purchaser in determining whether to purchase the issuer's securities or which may lead a prospective purchaser to question whether the securities dealer or advisor and the issuer are independent of one another.

Canaccord Genuity Corp. ("CGC") has a "related" or "connected" party relationship with the persons or companies listed in this Statement of Policies. CGC, its directors, officers, partners, salespersons, or other employees may from time to time recommend you trade in, or provide to you advice about a security issued by those listed persons or companies. If you wish further information concerning the relationship between CGC and those listed persons or companies, please contact us.

2. Statement of Business Activities

CGC may engage in the following business activities with respect to related and connected parties:

- 2.1. Act as underwriter in connection with the distribution of securities of the related or connected party, whether alone, in connection with other securities dealers or as a member of a selling group;
- 2.2. Trade in the securities of the related or connected party as principal or agent;
- 2.3. Purchase securities of the related or connected party from or on behalf of a CGC client;
- 2.4. Act as an advisor in respect of securities of the related or connected party; and
- 2.5. Recommend or co-operate with another person or persons in making a recommendation, in any medium of communication, that the securities of the related or connected party be purchased, sold or held.

3. Our Policies

CGC must make certain disclosures where we act as your dealer, advise you, or exercise discretion on your behalf with respect to securities issued by us, by a related party or, in the course of an initial distribution, by a connected party. In these situations, we must disclose either our relationship with the issuer of the securities, or that we are the issuer. CGC must also make disclosure to you where we know or should know that, as a result of our acting as your securities dealer or advisor, or of our exercising discretion on your behalf, securities will be purchased from or sold to us, an associated party or, in the course of an initial distribution, a connected party.

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

- Where we underwrite securities, the required disclosure will be contained in the prospectus or other document being used to qualify those securities.
- Where we buy or sell securities for your account, the required disclosure will be contained in the confirmation of trade 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.

In addition, where CGC exercises discretion under your authority in the purchase or sale of securities for your account, we may not exercise that discretion for the types of transactions described above unless we have obtained your prior written consent.

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4. List of Related and Connected Issuers

Canaccord Genuity Wealth Management ("CGWM") and Canaccord Genuity Direct ("CG Direct") are divisions of Canaccord Genuity Corp. ("CGC"). CGC is an investment dealer regulated by the Investment Industry Regulatory Organization of Canada ("IIROC") and a member of the Canadian Investment Protection Fund ("CIPF") and the Toronto Stock Exchange ("TSX").

CGC is a wholly-owned subsidiary company of Canaccord Genuity Group Inc. ("CGGI"), a publicly traded company listed on the TSX with its global headquarters located in Vancouver, Canada.

Canaccord Genuity G Ventures Corp. ("CGGV") is a growth-focused special purpose acquisition corporation formed for the purpose of effecting an acquisition of one or more businesses. Katapult Technology Corp. ("Katapult") is a publicly traded company listed on the TSX Venture Exchange, and CGGI is an influential securityholder of such issuer.

CGGI, CGGV and Katapult are related issuers of CGC. PK Core Fund and the MLD Core Fund are mutual funds managed by Purpose Investments Inc. that CGC provides portfolio management services. These funds are considered connected issuers of CGC by virtue of their relationship with CGC.

5. If you have any questions, please contact Canaccord Genuity Corp. Compliance:

In Ontario and Nova Scotia

Vice President, Compliance:
(416).867.6017

In Quebec

Vice President, Compliance:
(514).844.3427

In all other provinces and territories

Chief Compliance Officer:
(604).643.7343