

**Investment Fund Manager Section** 

# QUESTIONS FOR INVESTMENT FUND MANAGERS

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REFERENCE

\* Indicates required field

#### **CERTIFICATION**

This certification must be completed by your ultimate designated person. \*

Where my firm has completed this RAQ section in 2022, I acknowledge that some questions in the "Investment Fund Managers" section of the 2024 Risk Assessment Questionnaire were pre-populated with the firm's 2022 responses. I certify that I have reviewed and updated where necessary all pre-populated fields. Where my firm did not complete the previous RAQ, I acknowledge that I have received a blank RAQ section with no pre-populated fields. I certify that I have reviewed our responses to the "Investment Fund Managers" section of the 2024 Risk Assessment Questionnaire completed by our firm. To the best of my knowledge, the responses are complete, accurate, free from any misstatements, and not misleading in any respect. Name: \* Phone number: \* Date (YYYY-MM-DD): QUESTION F1 – ASSETS UNDER MANAGEMENT (AUM) (A) Are you the investment fund manager for any prospectus qualified funds? \* a) Yes - complete the table below b) No For prospectus qualified funds that have a fund-of-fund structure, the AUM should only be counted once if you are the investment fund manager of both the top fund and the underlying fund. Do you manage this type of investment fund? Number of Number of AUM as at December 31. If yes, complete AUM as at December 31. funds as at funds as at Type of fund information 2023 (in CAD) December 31, 2022 (in CAD) December 31, across the row. If 2023 2022 no, skip to the next row. Open-end/conventional mutual funds (other than money market funds) Money market funds Closed-end funds Exchange-traded funds Alternative mutual funds Labour-sponsored investment funds Scholarship plans

https://osc-efilings-dev1.powerappsportals.com/efilings/2024raq/ifm-section/print-page?guid=

Flow-through limited partnerships	•				
Other – If yes, complete row					
and specify fund type in	•				
comment box below					
		¢0,00	0	00.00	0
Sub-total		\$0.00	0	\$0.00	0
Types of other prospectus qualif	ied funds				
(B) Are you the investment fund	manager for any non-	-prospectus qualified funds (	also known as pros	spectus-exempt funds)? *	
a) Yes – complete the tal	ble below				
b) No					
For non-prospectus qualified fun manager of both the top fund an			ould only be count	ed once if you are the investr	nent fund
	Do you manage				
	this type of investment fund?		Number of		Number of
Tune of fund	If yes, complete	AUM as at December 31,	funds as at	AUM as at December 31,	funds as at
Type of fund	information	2023 (in CAD)	December 31,	2022 (in CAD)	December 31,
	across the row. If no, skip to the		2023		2022
	next row.				
Alternative strategies funds	•				
Money market funds	Ţ				
Pooled funds (other than					
alternative strategies funds or					
money market funds)					
Flow-through limited	-				
partnerships					
Other – If yes, complete row					
and specify fund type in	•				
comment box below					
Cult total		\$0.00	0	\$0.00	0
Sub-total		φ0.00	0	φυ.υυ	0
TOTAL AUM (including		\$0.00	0	\$0.00	0
prospectus qualified and non- prospectus qualified funds)					

Alternative strategies funds: Investment pools that use alternative investment strategies not generally available to traditional mutual funds such as taking both long and short positions and using arbitrage, leverage, options, futures, bonds and other financial instruments to capitalize on market conditions.

Types of other non-prospectus qualified funds

## **QUESTION F2 – BUSINESS STRUCTURE**

Is your firm also the portfolio manager responsible for advising **directly** the investment portfolios of all or some of the investment funds that you indicated in question F1? \*

<ul> <li>a) Yes – indicate the AUM of t</li> <li>b) No</li> </ul>	hose funds in the table below (exclude the AUM advi	sed by third-party portfolio managers)
Enter zero in the row that is not appli	cable to you.	
Type of fund	AUM as at December 31, 2023 (in CAD) *	
Prospectus qualified funds	\$	
Non-prospectus qualified funds	\$	
Total	\$0.00	
Additional comments, if necessary		

# **QUESTION F3 – PERFORMANCE RETURNS**

(A) Are you the investment fund manager for any prospectus qualified funds that have at least a full year of performance? \*

<ul><li>a) Yes – complete the table below in</li><li>b) No</li></ul>	n respect of such funds	ONLY	
Range of annual net performance returns i	In calendar years 2022 and 2023, did any of your funds have returns that fall within this range? If yes, provide the number of applicable funds in each year	Number of applicable funds in calendar year 2023	Number of applicable funds in calendar year 2022
Greater than or equal to 80%	•		
60% to less than 80%	-		
40% to less than 60%	<b>•</b>		
20% to less than 40%	•		
0% to less than 20%	•		
-20% to less than 0%	-		
-40% to less than -20%	•		
-60% to less than -40%	-		
-80% to less than -60%	•		
Less than -80%	-		
Total		0	0

(B) Are you the investment fund manager for any non-prospectus qualified funds that have at least a full year of performance? \*

<ul><li>a) Yes – complete the table bel</li><li>b) No</li></ul>	ow in respect of such funds		
Range of annual net performance returns <b>(</b> i	In calendar years 2022 and 2023, did any of your funds have returns that fall within this range? If yes, provide the number of applicable funds in each year	Number of applicable funds in calendar year 2023	Number of applicable funds in calendar year 2022
Greater than or equal to 80%	-		
60% to less than 80%	-		
40% to less than 60%			
20% to less than 40%			
0% to less than 20%	•		
-20% to less than 0%		ONL	
-40% to less than -20%	C		
-60% to less than -40%	- PE -		
-80% to less than -60%	-		
Less than -80%	<b></b>		
Total		0	0
Additional comments, if necessary			

# QUESTION F4 – CUSTODIAN INFORMATION ()

## Custodians

(A) Fill in the table below for your investment funds as at December 31, 2023. \*

(If your investment funds have a fund-of-fund structure and you are **also** the investment fund manager of the underlying funds, provide the custodian information separately by using one row for the top funds and another row for the underlying funds. However, if you are **not** the investment fund manager of the underlying funds, provide the custodian information for the top funds only.)

The amounts included in the 3<sup>rd</sup> column below should include total assets custodied by custodians (including assets for which custodian may have delegated custody function to a sub-custodian).

Not applicable – we do not use a custodian – provide explanation in comment box below (e.g. held in fund's name on issuer's book).

Explain why a custodian is not used.

Full legal name of custodian (refer to legal name used in custodial agreement or custodian statement) *	Type of investment fund *	Amount of assets held with the custodian for each type of fund (i.e. prospectus qualified or non-prospectus qualified funds) (in CAD) *	Do the investment funds have a fund-of- fund structure? *	Is the custodian functionally independent from your firm? *	Type of custodian *	Country where custodian is domiciled *
Total		\$0.00				
Indicate type of custodia	an and name of its regu	llator if type of custodian cho	osen is "Other"			
Do your custodians emp a) No – our custo b) Yes – our custo Provide the following info 31, 2023.	oloy the use of a sub-cu odian(s) do not utilize s todian(s) do utilize sub ormation for each sub-		(s) utilizes that I			as at December
custodian as at Decemb If your investment funds	er 31, 2023. have a fund-of-fund st for which you act as th	with which sub-custody agre ructure, aggregate the amoune ine investment fund manager the underlying funds.	int of assets hel	d by the sub-cust	odian only for funds	(whether the top
Full legal name of su to legal name used agreement or sub-cu	l in sub-custodial	Amount of assets dire sub-custodian	-	e Co	untry where sub-cus domiciled *	todian is
				\$		•

## Signing authority

(C) Are there any parties other than your firm who have signing authority over the custodial accounts? \*

a) Yes - provide details in comment box below, including the name of the other parties and nature of relationship with your firm

b) Not applicable - no other parties have signing authority except your firm

Name of other parties who have signing authority over the custodial accounts and nature of relationship

# **QUESTION F5 – TRUST ACCOUNTS**

Do you use trust accounts to process investor transactions (e.g. purchases, redemptions and cash distributions)? \* 👔

<ul> <li>a) Yes – fill in the table below</li> <li>b) No – provide explanation</li> </ul>		nt box below				
Explain why trust accounts are not used to process investor transactions						
Full legal name of the trust account *			wners of the trust ccount *	Is this trust a solely for p investor tra related to yo no, provide comment l	processing ansactions pur funds? If	Are there any parties other than your firm who have signing authority over the trust account? If yes, provide details in comment box below *
Describe how the trust account is us	ed for purpose	es other than p	processing investor t	ransactions relat	► ted to your fund:	▼ S
Names of other parties who have sig	gning authority	and their rela	tionship with your fir	m		
Provide details of your service provi	QUESTION F6 – SERVICE PROVIDERS Provide details of your service providers in the table below. *					
If a function is performed by more th	ian one service	e provider, pro	vide details of the ot	her service provi	iders in the com	ment box below.
	Nar	me of service p	provider	Related to registrant?	If related, pr	ovide nature of relationship
Fund accounting	<u>C</u> <u>C</u>			•		
Transfer agency				•		
Trust accounting				-		
Portfolio management				•		
Audit (investment fund manager)				-		
Audit (funds)				▼		
Legal				•		
Consultant – describe type of services in comment box below				-		
Trustee for the fund(s) if set up as trusts				•		
Details of other service providers if r	Details of other service providers if more than one service provider is engaged to perform a particular function					
Description of the type of services provided by the consultant						

# **QUESTION F7 – CHANGE IN SERVICE PROVIDERS**

Has there been a change in any of your service providers in the last two years ending December 31, 2023? \*

<ul><li>a) Yes - fill in the table below</li><li>b) No</li></ul>			
	Was there a change in service provider in the last two years ending December 31, 2023? *	Name of the previous service provider	Reason(s) for the change
Fund accounting	•		
Transfer agency	•		
Trust accounting	•		
Portfolio management	•		
Audit (investment fund manager)	•		
Audit (funds)	•	NCE	
Legal	- CRS		
Consultant	-		
Trustee for the fund(s) if set up as trusts	•		

#### Additional comments, if necessary

# **QUESTION F8 – OVERSIGHT OF SERVICE PROVIDERS**

(A) How do you oversee the service provider who performs the fund accounting function? Check all that apply. \*

a) Review daily reports provided by the service provider
b) Review weekly reports provided by the service provider
c) Review monthly reports provided by the service provider
d) Review quarterly reports provided by the service provider
e) Meet with key personnel of the service provider
f) On–going communication via email and/or phone
g) Annual performance review of the service provider
h) Other – provide details in comment box below
i) Not applicable – our firm performs this function in-house

(B) How do you oversee the service provider who performs the trust accounting function? Check all that apply. \*

	a) Review daily reports provided by the service provider
	b) Review weekly reports provided by the service provider
	c) Review monthly reports provided by the service provider
	d) Review quarterly reports provided by the service provider
	e) Meet with key personnel of the service provider
	f) On–going communication via email and/or phone
	g) Annual performance review of the service provider
	h) Other – provide details in comment box below
	i) Not applicable – our firm performs this function in-house

#### Provide details below if h) is selected

(C) How do you oversee the service provider who performs the transfer agency function? Check all that apply. \*

a) Review daily reports provided by the service provider	
b) Review weekly reports provided by the service provider	
c) Review monthly reports provided by the service provider	
d) Review quarterly reports provided by the service provider	
e) Meet with key personnel of the service provider	
f) On–going communication via email and/or phone	
g) Annual performance review of the service provider	
h) Other – provide details in comment box below	
i) Not applicable – our firm performs this function in-house	

Provide details below if h) is selected

## QUESTION F9 - FUNDS' INVESTMENT PORTFOLIOS

How do you monitor the investment portfolios of your funds? Check all that apply. \*

a) Periodic review of portfolios for compliance with stated investment objectives and restrictions
b) Periodic review of portfolios to ensure investment risks are being managed adequately and appropriately
c) Periodic review of fund performance
d) Meet with portfolio managers to discuss any of the above periodically
e) On-going communication with the portfolio managers via email and/or phone
f) Annual compliance certificate provided by portfolio managers
g) Other – provide details in comment box below
h) Not applicable – reviews are not completed

Provide details below if g) is selected

# QUESTION F10 - RECEIPT OF TRADE ORDERS

How do you receive trade orders from investors? Indicate the approximate volume of trades received in the past 12 months ending December 31, 2023. \*

Enter zero in the rows that are not applicable to you.

	Volume of trades in each category (as a percentage of total trade transactions)	
a) FundSERV *		%
b) Fax *		%
c) Email *		%
d) Phone *		%
e) Mail *		%
f) Other – provide details in comment box below *	AL	%
g) Not applicable – trades are processed directly through a stock exchange *	CF.ON	%
Total volume	ENUE	%
Provide details below if f) is selected	RL	
RE	*	

## QUESTION F11 – DISTRIBUTION OF FUNDS

How are your funds distributed? Check all that apply. \*

	a) We distribute using our dealer registration
	b) We distribute by relying on the exemption under section 8.6 of NI 31-103
	c) Related dealers
	d) Third-party dealers
	e) Other – provide details in comment box below
Provide	e details if e) is selected

# QUESTION F12 – PRIVATE OR ILLIQUID ASSETS ()

Are you the investment fund manager for any non-prospectus qualified funds? \*

a) Yes – complete the table below in respect of all non-prospectus qualified funds that you managed as at December 31, 202	3
b) No	

Enter zero in the rows that are not applicable to you.

Percentage of private or <b>illiquid</b> <b>assets</b> held in non-prospectus qualified funds	Number of non-prospectus qualified funds that hold private or illiquid assets in the respective range *	Total AUM of non-prospectus qualified funds that hold private or illiquid assets in the respective range (in CAD) *	Total dollar amount of private or illiquid assets held in non- prospectus qualified funds in the respective range (in CAD) *
No private or illiquid assets		\$	\$
Less than 10%		\$	\$
10% to less than 25%		\$	\$
25% to less than 50%		\$	\$
Greater than or equal to 50%		\$	\$
Total	0	\$0.00	\$0.00

Illiquid asset: Illiquid asset is defined under section 1.1 of National Instrument 81-102 *Investment Funds*, refer to the OSC website: <u>https://www.osc.ca/en/securities-law/instruments-rules-policies/8/81-102-81-102cp</u>

Additional comments, if necessary

# **QUESTION F13 – VALUATION OF SECURITIES**

How do you value securities where a public price is not available? Check all that apply. \*

	a) Independent dealer quotes
	b) Quotes from counterparties to OTC transactions
	c) Internal valuation models
	d) Independent valuation agents
	e) Financial information from manager of underlying fund in a fund-of-fund structure
	f) At cost until an event occurs which would prompt a change in price
	<ul> <li>g) Input from investment committee (e.g. discussions with management of the investee company(ies), research by the traders, discussions with portfolio managers)</li> </ul>
	h) Input from valuation committee
	i) Other – provide details in the comment box below
	j) Not applicable
Provide	e details below if i) is selected

## QUESTION F14 - MANAGEMENT EXPENSE RATIOS (MER)

(A) Are you the investment fund manager for any exchange-traded funds/index funds? \*

	a) Yes – complete the table below in respec	ct of the funds' MER as at December 31, 202	23
--	---	---	----

b) No

MER of exchange-traded funds/index funds

Did the MER fall within this range? If yes, complete information across the row

Number of funds

AUM of funds

0% to less than 0.5%	-		\$
0.5% to less than 0.75%	-		\$
0.75% to less than 1%	<b>•</b>		\$
1% to less than 1.5%	-		\$
1.5% to less than 2%			\$
2% and greater	<b>▼</b>		\$
Sub-total		0	\$0.00

(B) Are you the investment fund manager for any investment funds other than exchange-traded funds/index funds? \*

<ul><li>a) Yes – complete the table below</li><li>b) No</li></ul>	in respect of the funds' MER as	at December 31, 2023	
MER of funds other than exchange- traded funds/index funds	Did the MER fall within this range? If yes, complete information across the row	Number of funds	AUM of funds
0% to less than 2%			\$
2% to less than 3%	- CNU		\$
3% to less than 4%			\$
4% to less than 5%	-		\$
5% to less than 6%	-		\$
6% and greater	-		\$
Sub-total		0	\$0.00
Total (including exchange-traded funds/index funds)		0	\$0.00
Additional comments, if necessary			

## **QUESTION F15 – FUND FEES AND EXPENSES**

How are fees and expenses charged to your investment funds? Check all that apply.  $\boldsymbol{\ast}$ 

	a) Charging an all-inclusive fixed rate administration fee
	b) Charging direct expenses for services provided by third party suppliers
	c) Charging operating expenses using a rate capped by the firm
	d) Allocating the firm's overhead expenses for functions performed in-house
	e) Other – provide details in comment box below

f) Not applicable – provide details in comment box below

Provide details if e) is selected

Provide details if f) is selected

# **QUESTION F16 – PERFORMANCE FEES**

Fill in the table below. Enter zero if none of your investment funds were subject to performance fees.

	Calendar year 2023	3	Calendar year 2022
Total AUM of funds subject to performance fees (in CAD) $\mbox{\star}$		\$	\$
Number of funds subject to performance fees *			
Performance fees charged to funds (in CAD) *		\$	\$
Additional comments, if necessary	10		
QUESTION F17 – FUND TERMINATIONS Did you terminate any of your investment funds in the a) Yes, fill in the tables contained in parts (A) b) No		2023? *	
(A)			
Name of terminated fund *	AUM of terminated fund prior to termination (in CAD) *	Reason fund v	vas terminated *
1	\$		
(B) Fill in the table below for each fund termination re	ported in part (A).		

		Termination costs paid by:			
	Total costs relating to fund's termination (in CAD)	Investment fund manager (in CAD) *	Terminated fund (in CAD) *	Other parties (in CAD) Provide the name of other parties in comment box below *	
1 \$0.00		\$	\$	\$	
Na	mes of other parties who paid the te	rmination costs			

# **QUESTION F18 – FUND MERGERS**

Did any of your funds merge in the past 12 months ending December 31, 2023? \*

A)					
Name of discontinued fund *	Name of continuing fund *	AUM of discontinue fund prior to merger ( CAD) *	(in prior to m	erger (in R	eason funds vere merged *
) Fill in the table below for each f	und merger reported in part (A)				
		Merger cos	sts paid by:		
otal costs relating to the fund merger (in CAD)	Investment fund Dis manager (in CAD) *	scontinued fund (in CAD) *	Continuing fund (in CAD) *	Provide the	arties (in CAD) ne name of other the comment bo below *
\$0.00					
mes of other parties who paid th	e merger costs		1		
	5				
UESTION F19 – NET ASS d you have any NAV errors (as d			ne past 12 months e	ending December	31, 2023? * 👔
a) Yes – Provide details in t					·
b) No					
b) No	Total number of NAV restatements required due t NAV errors	Dollar amount re to funds due to N/ CAE	AV errors (in	Dollar amount r investors due to CAE	NAV errors (in
RF	restatements required due t	to funds due to N/	AV errors (in	investors due to	NAV errors (in
RF	restatements required due t	to funds due to N/	AV errors (in ))	investors due to	NAV errors (in ))

(A) Did you refer any conflict of interest matters to your funds' IRC (other than matters that had been addressed by standing instructions already) in the past 12 months ending December 31, 2023? \*

	a) Yes	
	b) No	
	c) Not applicable – our funds do not have an IRC	

(B) Did the IRC of your funds provide any of the following reports in the past 12 months ending December 31, 2023? Check all that apply. \*

a) A written report to your firm, indicating a breach of your policies or procedures as a result of the IRC's assessment

b) A written report to your firm, indicating a breach of a condition imposed by the IRC in a recommendation or approval

<ul> <li>c) A written report to securityholders, indicating that you acted in a conflict of interest matter to which the IRC did not give a positive recommendation</li> <li>d) A written report to securityholders, indicating that you acted in a conflict of interest matter and that you did not meet a condition imposed by the IRC in its standing instructions</li> <li>e) None – the IRC reports did not contain any of the above</li> </ul>	
Additional comments, if necessary	
QUESTION F21 – MUTUAL FUND SALES PRACTICES	
Did you participate in activities relating to mutual fund sales practices in the past 12 months ending December 31, 2023? *	
<ul><li>a) Yes – fill in the table below</li><li>b) No</li></ul>	
Enter zero in the rows that are not applicable to you.	
Type of activity	Amount spent on each type of activity in calendar year 2023 (in CAD)
Cooperative marketing practices, section 5.1 of National Instrument 81-105 <i>Mutual Fund Sales Practices</i> (NI 81-105)	\$
Mutual fund sponsored conferences, section 5.2 of NI 81-105	\$
Third party sponsored educational events, section 5.3 of NI 81-105	\$
Industry association sponsored events, section 5.4 of NI 81-105	\$
Participating dealer sponsored events, section 5.5 of NI 81-105	\$

Promotional items and business promotion activities, section 5.6 of NI  $81\mathchar`-105$ 

Total

Refer to OSC website for NI 81-105 https://www.osc.ca/en/securities-law/instruments-rules-policies/8/81-105

Additional comments, if necessary

# QUESTION F22 – AUTOMATED COMPLIANCE SYSTEM ()

Do you use an automated system to assist you with the following? Check all that apply. \*

- a) Complying with National Instrument 81-102 *Investment Funds* requirements
  b) Complying with disclosure in offering documents of the investment funds you manage
  c) Monitoring fluctuations in the net asset value of an investment fund
  d) Monitoring fluctuations in the price of securities
- e) Reconciling between different systems (fund accounting records vs custodian records)

f) Identifying unitholders switching in/out of funds and other trading patterns

g) Other – provide details in comment box below

\$

\$0.00

Describe how you use the automated system to monitor compliance if g) is selected

# FINAL FEEDBACK

0/3,000

REFERENCE