



## Spartan Fund Management Inc.

### RELATIONSHIP DISCLOSURE INFORMATION (“RDI”)

#### INTRODUCTION

As a client of Spartan Fund Management Inc. (“**Spartan**”), it is important that you understand the nature of the services that will be provided by Spartan and what you, as client and investor, can and should do to ensure a satisfactory ongoing relationship. To this end, we are providing this RDI which describes what a reasonable investor needs to know about Spartan to better understand the nature of our role and responsibilities. This document contains the following information:

- The RDI required to be delivered to you in accordance with Section 14.2 of National Instrument 31-103 - *Registrations Requirements, Exemptions and Ongoing Registrants Obligations* (“**NI 31-103**”).
- A description of the measures that we are required to implement in accordance with applicable anti-money laundering and terrorist financing legislation.
- A description of the data and privacy protection we provide to your personal information collected for the purposes of managing your account with us.
- A description of our electronic delivery of documents policy.

#### DELIVERY AND UPDATES

This information is current as of the date provided to you. Please note that we will post our most current version of this document at [www.spartanfunds.ca](http://www.spartanfunds.ca) and inform you when a new update has been posted.

If you have any questions about this document, please contact us at:

150 King Street West, Suite 200  
Toronto ON M5H 1J9 CAN  
Phone: (416)601-3171

#### OUR REGISTRATIONS

Spartan is registered as an investment fund manager in Ontario, Québec, British Columbia and Newfoundland and Labrador, as a portfolio manager in Ontario, Québec, British Columbia and Newfoundland and Labrador, as an exempt market dealer in Ontario, Quebec, British Columbia and Alberta and a commodity trading manager in Ontario.

#### PRODUCTS AND SERVICES OFFERED

Spartan is an investment fund and asset management company that offers various investment funds organized as trusts, limited partnerships or companies including Alpine StepStone Diversified Private Markets Fund (2021 Vintage) LP, Alpine Global Sustainability Fund (2022 Vintage) LP, Alpine SPRIM™ Private Markets Fund, Alpine SPRING Private Venture & Growth Fund, BB Fund (Canada) LP, BDG Access Fund LP, Bromma Resource Canada Access Fund, DP PF Access Fund, eCapital Convertible Preferred Share LP, ElevenFund, Libertas Real Asset

Opportunities Fund, LSQ Fund, LSQ SPAC Plus (+) Fund, MHF Fund (Canada) LP, MM Fund, MMCAP Canadian Fund, PG Global Private Equity Canada Access Fund, Systematic Total Alpha (Blackrock) Spartan Access Fund, Teraz Fund, Walmer Flagship Fund LP, WHL (Canada) I LP, WHL (Canada) II LP, WHL (Canada) III LP, WHL (Canada) IV LP, WLP (Canada) Fund V LP, and WLP (Canada) Fund VI LP (individually, a “**Fund**” and collectively, the “**Funds**”).

This RDI is provided to clients who: (i) are qualified as “accredited investors” under National Instrument 45-106 - *Prospectus and Registration Exemptions*; (ii) purchase units of any of the Funds pursuant to other available exemptions from the prospectus requirement under applicable securities laws and, in each case, who acquire such units directly through Spartan acting in its capacity as an exempt market dealer; (iii) establish a separately managed account for which Spartan acts as investment adviser. In all of the above cases, unless specifically discussed with the client, Spartan will only consider the Funds when offering its clients investment solutions. Third party securities are not typically considered unless part of any underlying portfolio of one of the Funds.

#### **CLIENT’S ACCOUNT WITH SPARTAN**

A client’s account with Spartan is governed by the terms of the applicable offering documents relating to the Fund or Funds in which the client wishes to invest or, where applicable, by the terms of the investment management agreement entered into between the client and Spartan in relation to a separately managed account.

#### **ENSURING WE KNOW OUR CLIENTS**

As a registrant under Canadian securities legislation, Spartan is subject to conduct rules relating to “know-your-client” obligations. These rules require a registrant to learn about each client and keep the information current, including information related to investment objectives, investment knowledge and experience, risk tolerance, investment time frame, employment status, income level and net worth. For clients that are not individuals, information concerning the nature of a prospective client’s business, control structure and specified beneficial ownership is also collected.

Accordingly, when opening an account, Spartan must take reasonable steps to:

- Establish your identity and if we have a cause for concern, make reasonable inquiries as to your reputation.
- Establish whether you are an insider of a reporting issuer or any other issuer whose securities may be publicly traded.
- Ensure that we have sufficient information to meet our obligations regarding suitability namely; your investment needs and objectives, your financial circumstances and your risk tolerance.
- Obtain information to establish the identity of any individual who, in the case of a partnership or trust, exercises control over the entity or, in the case of a corporation, is a beneficial owner of or exercises voting rights of the outstanding voting securities of the corporation.

Spartan collects the “Know Your Client” information (“KYC”) from its clients by asking them to complete and sign a KYC form. The personal information gathered through this process allows us to evaluate the suitability of the securities we may transact for their account. By completing and executing our Subscription Agreement for an investment in a Fund, our clients consent to our collection, use and disclosure of their personal information as necessary to comply with applicable legislation, it being understood that this personal information may only be used and disclosed for the purposes it was collected.

Spartan takes reasonable steps to keep the KYC information current. You can help us in this endeavor by providing us with new information that you deem of importance on a timely basis and you should promptly advise us of any material changes to your life circumstances or investment objectives. All personal, confidential information we receive from you will be treated in accordance with our Privacy Policy, a copy of which is contained at Appendix A to this document.

## **INVESTMENT SUITABILITY**

As both: i) portfolio manager to the Funds and, as applicable, to underlying clients in a managed account; and ii) as exempt market dealer to certain clients investing in the Funds, Spartan has an obligation to take reasonable steps to ensure that, before it makes a recommendation to or accepts instructions from you to buy or sell a security or takes any investment action, as applicable, the investment action is suitable. Spartan must put the client's interest first when it takes an investment action for a client.

To meet our suitability obligation, we must also "know" and understand each investment we place you in. This includes both the Funds and the underlying investment portfolios of those funds. Through our "know-your-product" ("KYP") due diligence process, the firm analyzes every investment we place you in or recommend to you. Our KYP process is coordinated by the firm's advising representative(s), as applicable. Without limitation, as part of the firm's KYP process, we generally consider such things as the reputation and track record of the investment product, the potential for profit and loss, the associated risk level and potential for conflicts of interest, the investment's time horizon and complexity and the specific features of any investment, including costs and fees, liquidity and redemption rights.

Once we have collected your KYC information and we have conducted our KYP process, we can then use all of that information to determine whether or not an investment is suitable for you.

Spartan does not purport to provide advice or guidance on your general financial needs or circumstances nor does Spartan offer custody services, brokerage services, tax advice, actuarial advice or financial planning. Your account with Spartan has been opened solely for the purpose of transacting in one or more of the Funds.

## **FEES AND COSTS RELATED TO YOUR INVESTMENTS IN THE FUNDS**

The fees applicable to an investment in the units of a Fund or any redemption of such units of a Fund are as set out in the offering documents relating to an investment in the units of a particular Fund. The offering documentation also describes the costs that may be charged to the Funds such as operating expenses (audit fees, legal fees, etc.).

Spartan, acting in its capacity as an exempt market dealer, will not charge clients any fees for the operation of their account or the making, holding or selling of investments in any of the Funds. Any fees in respect of a managed account will be considered on a case by case basis and will be set out in an investment management agreement.

## **REPORTING**

Statements of the client's account will be provided monthly or quarterly depending on the offering. These statements will contain:

1. information about each transaction conducted for the client during the time period covered by the statement; and
2. information about each unit the client owns in the account at the end of the period covered by the statement.

Annual financial statements and interim financial statements with respect to a Fund invested in by the client are provided to the client to the extent those statements are required by law to be provided, except as otherwise directed by the client pursuant to instructions given to Spartan.

Spartan will provide you with an annual report on any charges that you paid to Spartan as well as any other compensation that Spartan received in connection with operating your account. Spartan will also provide you with an annual report on the investment performance of each of your Spartan accounts or, with your consent, all of your accounts on a consolidated basis. Spartan may not, and is not obligated, to provide such a report to any client who is a “permitted client” as defined in Canadian securities regulations and who is not an individual.

#### **USE OF BENCHMARKS**

An investment performance benchmark (“benchmark”) is a standard against which the performance of an investment fund or an investment account can be compared. In some circumstances, a benchmark can be a specified rate of return or the return of another investment option, for example a 5-year Government of Canada bond. But typically, benchmarks are “market indices”, for example the S&P TSX 60 Index, or a blend of market indices that are representative of the investment fund or account being considered. Spartan does not typically use benchmarks.

#### **INVESTMENT RISKS**

An investment in the Funds should only be made after consulting with independent and qualified sources of investment and tax advice. Only investors who can reasonably afford the risk of loss of their entire investment should consider the purchase of units of any of the Funds. The risks associated with an investment in a Fund are set forth in the applicable offering documentation for the Fund. We note that beyond specific product risks there are additional risks of investing, including but not limited to considerations such as concentration risk and liquidity risk. Concentration risk is where focusing on security holdings in a particular issuer, group of issuers, industry, sector, country or region or to produce a particular impact will entail more market value volatility and a great risk of financial loss than if security holdings were more diversified. Liquidity risk is where a security cannot readily be converted into cash when required.

#### **USING BORROWED MONEY TO PURCHASE SECURITIES**

Spartan does not arrange for nor recommends that a client borrows money in order to invest in the Funds.

Borrowing money to finance the purchase of units of a Fund involves greater risks than a purchase using cash resources only. If a client borrows money to purchase units, the responsibility to repay the loan and pay interest as required by its terms remains the same even if the value of the units purchased declines.

#### **CONFLICTS OF INTEREST DISCLOSURE STATEMENT**

Under applicable Canadian securities laws, we are required to address and manage existing, as well as reasonably foreseeable, material conflicts in the best interests of our clients.

A conflict of interest can include any circumstance where:

- (a) the interests of different parties, such as the interests of the Firm and those of a client, are inconsistent or divergent;

- (b) the Firm or one of its registered representatives may be influenced to put their interests ahead of a client's interests; or
- (c) monetary or non-monetary benefits or disadvantages accruing to Spartan or its registered representatives that might compromise the trust that a reasonable client has in the firm or any of its registered representatives.

Whether a conflict is "material" or not depends on the circumstances. In determining whether a conflict is material, we will typically consider whether the conflict may be reasonably expected to affect the decisions of our clients in the circumstances, and/or the recommendations or decisions of the Firm or its registered representatives in the circumstances.

What follows below are details regarding the specific material conflicts of interest that we have identified to date. In case other material conflicts of interest arise, which may happen from time to time, we will inform you of the nature and extent of any such other conflicts of interest prior to any of your subsequent transactions with us or our advice to you.

### ***1. Proprietary Products and Connected Issuers***

For the purposes of this summary, (i) the word "connected" is intended to involve a state of indebtedness to, or other relationship with, the registrant or those "related" to the registrant that, in connection with a distribution of securities, would be material to a purchaser of the securities; and (ii) the word "related" is intended to involve positions permitting, through ownership or otherwise, a controlling influence, and would include all companies under a common controlling influence.

Spartan's business model includes managing the proprietary Funds. The Funds are connected/related to Spartan because the Firm established the Funds and acts as their portfolio manager and investment fund manager.

Regulators have noted that where a registered firm distributes securities of connected/related issuers, a material conflict of interest exists because Spartan may have an incentive to recommend the Funds to its clients over other third party funds that do not provide similar incentives. Spartan may also be incented to fail to disclose or provide inadequate disclosure to investors about the Funds in cases where there is negative information (for example, where a company owned by one of the Funds is experiencing financial difficulty), resulting in investors taking on more risk than they could, or wish to, bear.

Spartan takes the following steps to mitigate the actual and potential conflicts of interest described above:

- Funds are primarily distributed by third party dealers. Accordingly, it is only in limited circumstances where Spartan would be recommending its own proprietary Funds.
- On an annual basis, Spartan conducts an analysis of similar funds available to a similar client base. Spartan is comfortable that the Funds compare favorably to these similar funds.
- Spartan has policies and procedures in place to ensure that its representatives conduct a suitability analysis for each client accepted into the Funds. This suitability analysis ensures that the Funds are appropriate for that client. Certain types of clients may be able to waive this suitability.

- In conducting its suitability analysis for a client, each representative of Spartan will have a thorough understanding of: (i) the structure and features of the Spartan funds; and (ii) amongst other client information, the personal and financial circumstances of that relevant client.
- Each Spartan Fund has a specific mandate and strategy. Spartan works to have each Spartan Fund distinct and separate such that the mandate of one Spartan Fund is clearly distinguishable from the other Funds. This enables dealing representatives of Spartan to clearly match a client investment need with one of the Funds.

## **2. *Internal Compensation Arrangements***

Where an internal compensation structure exists, Spartan's dealers may be perceived as incentivized to recommend certain products or services in greater amounts or proportions than what may be suitable for a client. Furthermore, Spartan's advisers may be perceived as taking greater risks in allocating Fund investments where that adviser's incentive structure is based on Fund performance. Spartan takes the following steps to mitigate the actual and potential conflict of interest described above:

- Spartan has a detailed Know Your Client, Know your Product and Suitability process that is followed by all dealers and advisers of Spartan.
- All Fund strategies, executed by advisers of Spartan, are monitored by senior management of Spartan. Senior management's compensation is not linked to any Fund performance fees.
- The Chief Compliance Officer periodically reviews client files and suitability recommendations of registered Spartan employees from time to time. Spartan employees understand that any incentive structure could be affected if suitability issues are found during these reviews.

## **3. *Outside Activities***

Spartan's registered individuals may become involved in other activities outside of their employment with Spartan (e.g., sitting on boards of directors or providing volunteer services for a charity). These outside activities could: (i) impact the amount of time a Spartan registered individual spends on Spartan employment or registration obligation; and (ii) create a conflicting interest as to how a Spartan registered individual discharges its obligations to Spartan or its clients.

Spartan has policies and procedures to ensure that all outside activities are reported to and considered by its Chief Compliance Officer. The Chief Compliance Officer will only approve such outside activities that do not conflict with Spartan operations or obligations.

## **4. *Best Execution***

Spartan may hire a brokerage firm to execute trades on behalf of the Funds based on a pre-existing relationship, rather than objective qualitative or quantitative considerations. This is considered a best execution conflict of interest.

Spartan has policies and procedures to ensure that when Spartan directs brokerage transactions to brokers, the service is comparable to that which Spartan may obtain from other brokers and the commission rates are equivalent to or better than those that would have been normally charged by the broker. Spartan monitors the level of service provided by any broker retained on behalf of

the Funds with respect to the cost and execution of trades.

## **5. Gifts and Entertainment**

While it is recognized that conducting business may involve some modest exchange of gifts and business-related entertainment, the value of such gifts and entertainment must not create a real or perceived conflict of interest and must not impair the independence or objectivity of the recipient.

Spartan has policies and procedures in place with respect to the receipt or giving of gifts and/or entertainment. These policies and procedures require employees to contact the Chief Compliance Officer with any concerns about the receipt or giving of a gift or entertainment and whether that may create a conflict of interest. Further, employees are required to notify the Chief Compliance Officer upon receipt of a gift or entertainment in excess of \$300 (on an individual basis).

## **6. *Manager Decisions (Securities Valuations, NAV Errors, Expense Allocation and Personal Trading)***

Spartan has a responsibility to ensure that all decisions taken in respect of the Funds are in the best interest of the Funds. Some actions that would be clearly not in the interest of the Funds include: i) inflating the valuation of some of its portfolio securities to increase performance fees; ii) correcting any NAV error in a manner that would prejudice the Fund over Spartan; iii) Allocating inappropriate expenses to the Funds; and iv) allowing employees of Spartan to “front run” or otherwise personally benefit off of the knowledge of an anticipated Fund investment.

Spartan has clear policies and procedures that prescribe specific (and generally objective) steps and criteria for each of the above circumstances to ensure that they are dealt with in an appropriate manner or otherwise prevented outright. These policies are reviewed at least annually. The Chief Compliance Officer of Spartan’s role is to review and enforce these procedures to ensure that they are adhered to within Spartan.

## **7. *Fair Allocation***

Spartan has a responsibility to ensure that all client accounts are provided equal opportunity to participate in investment ideas.

When an attractive investment opportunity is identified, Spartan will confirm the client account mandates under which the opportunity qualifies and determine the position for each qualifying client account. The position is determined based on the client’s investment mandate, total assets, available liquidity, risk profile and any other factors Spartan deems relevant to the client. Orders for multiple client accounts are grouped and submitted together.

Each client account is allocated its pro rata share based on its relative position size, as determined by the executing advising representative at the time of the trade, and the same blended price of each fill wherever practicable. Partial fills are allocated equitably on a pro-rata basis based on relative position size across all applicable client accounts, except on the rare occasion that minimum transaction charges will make this uneconomic for the client (i.e., transaction expenses are too high compared with the value of the transaction).

Brokers are asked to hold uneconomic partial fills until such time as the transaction becomes large enough to be allocated fairly amongst all applicable accounts in a cost effective manner. Each client account receives its pro rata amount, rounded to a board lot. This process is repeated until the entire position is purchased. If the broker is not able to hold the partial fill until it is economic for all accounts, then fills are allocated to those accounts for which it is economic. This applies equally to orders for initial public offerings that are only partially filled.

## WHAT TO DO IF YOU HAVE A COMPLAINT

Spartan maintains an ongoing membership with the Ombudsman for Banking Services and Investments (“OBSI”). Please see Appendix “A” to this Relationship Disclosure Information for a description of Spartan’s complaint handling process and the procedure to be followed if you wish to have your complaint resolved by OBSI.

## SOFT DOLLAR ARRANGEMENTS

Soft dollar arrangements occur when brokers have agreed to provide other services (relating to research and trade execution) at no cost to Spartan in exchange for brokerage business from Spartan’s managed accounts and investment funds. Although the brokers involved in soft dollar arrangements do not necessarily charge the lowest brokerage commissions, Spartan will nonetheless enter into such arrangements when it is of the view that such brokers provide best execution and/or the value of the research and other services exceeds any incremental commission costs.

Spartan intends to enter into soft dollar arrangements in accordance with industry standards when it is of the view that such arrangements are for the benefit of its investors.

## ANTI-MONEY LAUNDERING AND TERRORIST FINANCING

Under the provisions of the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* (Canada), Spartan is obligated to implement specific measures to detect and deter money laundering and the financing of terrorist activity. As such, all investments into our Funds require completed documentation including confirmation of investor identification or financial entity information. If Spartan is aware or suspects that an investor is engaged in money laundering, it is our duty to report our suspicions to the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC). Any such reporting will not be deemed a breach of privacy and confidentiality restrictions imposed by applicable law or otherwise.

Additional information on FINTRAC can be obtained at <http://fintrac-canafe.gc.ca>.

Canada’s legislative measures against terrorists, terrorist groups and other listed and sanctioned individuals and entities, prohibit activity with respect to assets of persons designated under such legislation. Registered advisers or dealers are also required to make monthly reports to securities regulators, stating whether they have had any dealings with persons on official lists of terrorists. Accordingly, Spartan is required, on a monthly basis, to compare its client list to the list of names published on official lists of terrorists. An exception report would be produced and filed if any matches occurred.

## DATA AND PRIVACY PROTECTION

The privacy of our clients is very important to us. Set forth below are our policies with respect to personal information of clients that we collect, use and disclose. In connection with an investment in one or more of the Funds, we collect, maintain and may disclose personal information about investors to meet legal, regulatory requirements, year-end tax preparation and for any other purpose to which you may consent in the future. Your personal information is collected from the following sources:

- (a) Subscription agreements or other forms that you submit to us;
- (b) Your transactions with us and our affiliates; and
- (c) Meetings and telephone conversations with you.

Unless you advise otherwise, by providing us with your personal information you have consented to our collection, use and disclosure of your information as provided herein and as provided in the governing documents of the applicable Fund.

Investor private information is strictly protected, and access is restricted only to circumstances where we require information to provide services directly to you and to meet compliance requirements in accordance with regulatory bodies.

Investor personal information is maintained on our secure networks. Your information may also be stored on a secure off-site storage facility. You may access your personal information to verify its accuracy, to withdraw your consent to any of the foregoing collections, uses and/or disclosures being made of your personal information and may update your information by contacting Spartan at (416) 601-3171. Please note that your ability to participate in the Funds may be impacted should you withdraw your consent to the collection, use and disclosure of your personal information as outlined above due to our inability to comply with regulatory requirements if this consent is not provided.

Investors should be aware that the Funds are required to file with the Ontario Securities Commission a report setting out the Subscriber's name and address, the class and series of Units issued, the date of issuance and the purchase price of Units issued to the Investor. Such information is collected indirectly by the Commission under the authority granted to it in securities legislation, for the purposes of the administration and enforcement of the securities legislation of Ontario. By submitting a subscription into a Fund, the Investor authorizes such indirect collection of the information by the Commission.

The following official can answer questions about the Commission's indirect collection of the information: Ontario Securities Commission

Administrative Assistant to the Director of Corporate Finance  
Suite 1903, Box 55, 20 Queen Street West Toronto, Ontario M5H 3S8  
Telephone: (416) 593 8086  
Facsimile: (416) 593 8252

## **CONSENT TO ELECTRONIC DELIVERY OF DOCUMENTS**

As part of the account opening process, Spartan provides its clients with the possibility to consent to the electronic delivery of documents if they wish to receive electronic delivery of the documents which relate to their investment in the Funds. Clients can consent to this electronic delivery of documents by signing the applicable section of the Subscription Agreement for the applicable Fund. Client's consent may be revoked or altered, including any change in the electronic mail address provided, at any time by notifying Spartan of such revoked or altered consent by telephone, regular mail, or electronic mail.

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Should you have any questions regarding this RDI, please do not hesitate to contact us.

August 2026

## APPENDIX “A”

### SPARTAN FUND MANAGEMENT INC.

#### WHAT TO DO IF YOU HAVE A COMPLAINT

##### Our Complaint Process

##### *Filing a complaint with us*

If you have a complaint about our services or a product, contact us at:

Spartan Fund Management Inc.  
150 King Street West, Suite 200  
Toronto, Ontario, M5H 1J9 Attn: Gary Ostoich  
Tel: 416-601-3171  
Fax: 416-601-5611  
Email: [gostoich@spartanfunds.ca](mailto:gostoich@spartanfunds.ca)

You may want to consider using a method other than email for sensitive information.

##### **Tell us:**

- What went wrong
- When it happened
- What you expect (for example, money back, an apology, account correction)

| <b>We will acknowledge your complaint</b>                                                                                                                                                                                                            | <b>Help us resolve your complaint sooner</b>                                                                                                                                                                                                                      |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>We will acknowledge your complaint in writing as soon as possible, typically within five (5) business days of receiving your complaint.</p> <p>We may ask you to provide clarification or more information to help us resolve your complaint.</p> | <ul style="list-style-type: none"><li>• Make your complaint as soon as possible</li><li>• Reply promptly if we ask you for more information</li><li>• Keep copies of all relevant document, such as letters, emails and notes of conversations with us.</li></ul> |

##### **We will provide our decision**

We normally provide our decision in writing, within 90 days of receiving a complaint. It will include:

- a summary of the complaint
- the results of our investigation

- our decision to make an offer to resolve the complaint or deny it, and any explanation of our decision.

**If our decision is delayed**

If we can't provide you with our decision within 90 days, we will:

- inform you of the delay
- explain why our decision is delayed; and
- give you a new date by which to expect our decision

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|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>You may be eligible for the independent dispute resolution service offered by the Ombudsman for Banking Services and Investments (OBSI).</p> <p><b>If you are not satisfied with our decision</b></p> <p>You may be eligible for OBSI's dispute resolution service.</p> <p><b>If you are a Québec resident</b></p> <p>You may consider the free mediation service offered by the Autorité des marchés financiers.</p> | <p><b>A word about legal advice</b></p> <p>You always have the right to go to a lawyer or seek other ways of resolving your dispute at any time. A lawyer can advise you of your options. There are time limits for taking legal action. Delays could limit your options and legal rights later on.</p> |
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## Taking Your Complaint to OBSI

You may be eligible for OBSI's free and independent dispute resolution service if:

- We do not provide our decision within 90 days after you have made a complaint, or
- You are not satisfied with our decision

OBSI can recommend compensation of up to \$350,000.

OBSI's service is available to clients of Spartan. This does not restrict your ability to take a complaint to a dispute resolution service of your choosing at your own expense, or to bring an action in court. Keep in mind there are time limits for taking legal action.

**Who can use OBSI?**

You have the right to use OBSI's service if:

- Your complaint relates to a trading or advising activity of our firm or by one of our representatives;
- You brought the complaint to us within six (6) years from the time that you first knew, or ought to have known, about the event that caused the complaint; and
- You file your complaint with OBSI according to its time limits below

|                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                       |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Filing a complaint with OBSI</b></p> <p><b>Contact OBSI</b><br/> Email: <a href="mailto:ombudsman@obsi.ca">ombudsman@obsi.ca</a><br/> Telephone: 1-888-451-4519 or 416-287-2877<br/> in Toronto</p>                                                                                                    | <p><b>Information OBSI needs to help you:</b></p> <p>OBSI can help you best if you promptly provide all relevant information including:</p> <ul style="list-style-type: none"> <li>• your name and contact information</li> </ul>                                                                                                                     |
| <p><b>OBSI will investigate</b></p> <p>OBSI works confidentially and in an informal manner. It is not like going to court, and you do not need a lawyer.</p> <p>During its investigation, OBSI may interview you and representatives of our firm. We are required to cooperate in OBSI's investigations.</p> | <ul style="list-style-type: none"> <li>• our firm's name and contact information</li> <li>• the names and contact information of any of our representatives who have been involved in your complaint</li> <li>• details of your complaint</li> <li>• all relevant documents, including any correspondence and notes of discussions with us</li> </ul> |

### **OBSI will provide its recommendation**

Once OBSI has completed its investigation, it will provide its recommendations to you and us. OBSI's recommendations are not binding on you or us.

OBSI can recommend compensation of up to \$350,000. If your claim is higher, you will have to agree to that limit on any compensation you seek through OBSI. If you recover more than \$350,000, you may want to consider another option, such as legal action, to resolve your complaint.

**For more information about OBSI, please visit [www.obsi.ca](http://www.obsi.ca)**