

Seymour Conflicts of Interest Policy

Last Updated Sept 3, 2021

A conflict of interest is considered to be any circumstance where the interests of different parties, such as the interests of a client and those of the Firm, are inconsistent or divergent. If a director, officer, or employee of the Firm knows, or should know, that a conflict of interest exists or may arise, all relevant details of the conflict or potential conflict must be brought to the attention of the Chief Compliance Officer (CCO) immediately. If there is any doubt as to whether a conflict of interest exists or could arise, the CCO should immediately be informed of the relevant details concerning the conflict or potential conflict to determine whether or not a conflict exists and any action that may be required. Any such conflict of interest must be disclosed, in a timely manner, to the client who is affected by the conflict of interest. The disclosure should include the nature and extent of the conflict of interest. Existing and potential conflicts of interest will be identified to new clients before a client investment management agreement is entered into.

The CCO will maintain a list of all related and connected parties of the Firm.

As of the date this manual was prepared, there are no related or connected parties of the Firm.

A “responsible person” is defined as the Firm, a partner, director or officer of the Firm, and each of the following who has access to, or participates in the formulating of investment decisions made on behalf of a client of the Firm:

- i. an employee or agent of the Firm
- ii. an affiliate of the Firm
- iii. a partner, director, officer, employee or agent of an affiliate of the Firm

Securities law prohibits the Firm from knowingly causing an investment portfolio managed by it, including an investment fund for which it acts as an adviser, to purchase a security of an issuer in which a responsible person or an associate of a responsible person is a partner, officer or director unless this facts is disclosed to the client and the Firm has received the client’s written consent prior to the purchase. The Firm must not knowingly cause an investment portfolio managed by it, including an investment fund for which it acts as an adviser, to purchase or sell a security from or to the investment portfolio of a responsible person, an associate of a responsible person, or an investment fund for which a responsible person acts as an adviser.



Suite 900 - 1285
West Pender Street
Vancouver, BC, V6E 4B1



info@seymourinvest.ca
seymourinvest.ca
604.659.1722