

## **Seymour Employee Trading Policy**

Last Updated Sept 3, 2021

Every employee, officer, and director of the Firm must maintain a record and advise the CCO of their personal trading activities, including descriptions of the securities traded, the prices paid or received for securities traded and the name(s) of the institution(s) through which the trades were executed. With the exception of trades in opened-ended mutual funds, exchange traded funds, and government issued debt, all employee trades are subject to the prior approval of the CCO.

### *Restrictions on Trading*

With the exception of open-ended mutual funds, exchange traded funds, and government issued debt, directors, officers, and employees are not permitted to trade in any securities that are held by accounts managed by the Firm or that are being considered as investments for accounts managed by the Firm, nor are they permitted to participate in an initial or secondary public offering, private placement, or “hot issue”. An exception may be granted in the case of a private placement that is truly private and there is no reasonable prospect that the issuer will make a public offering of the securities in the foreseeable future, or in the case where the CCO has permitted the trade, such as a trade in a highly liquid stock.

### *Duplicate Statements*

Employees, including their spouse or significant other, and children living in the same residence are required to have their dealer send duplicate statements of their accounts to the CCO for review. The CCO will review the duplicate statements on a monthly basis to verify compliance with the Firm’s policies.



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

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info@seymourinvest.ca  
seymourinvest.ca  
604.659.1722

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