



CONFLICTS OF INTEREST DISCLOSURE

Overview of Client Focused Reforms and Conflicts of Interest Disclosures

The Canadian securities regulators are enhancing their rules to better support your interests as a client. These enhanced rules are based on the fundamental concept that your interests must always come first. Here at RT Mosaic our goal is to be acting in our clients' best interests at all times and these new rules require us to provide enhanced disclosure so that you have greater visibility of our efforts to always act in your best interests.

Conflicts of Interest

What exactly is a conflict of interest? A conflict of interest means that there is an influence which may affect the decision we, as your portfolio manager would make in the management of your account, or conversely it may affect the decision that you, as the client, would make regarding your account with us. At RT Mosaic, we have adopted policies and procedures to assist in identifying conflicts of interest, and once a material conflict of interest is identified, we will avoid it, or if we cannot avoid it, we will control the conflict with policies and processes, and where it will assist in managing the conflict, we will provide disclosure to you in order to explain how we manage the conflict in your best interests. This disclosure will assist you in helping to understand the nature of your relationship with RT Mosaic.

Our existing or reasonably foreseeable material conflicts of interest are described below.

Conflict	How We Addresses the Conflict
Proprietary Products	We do not utilize any proprietary products in the management of your accounts.
Third-party compensation	We do not receive compensation from the sale of third-party products.
Internal compensation arrangements and incentive practices	We do not compensate based upon sales-based targets.
Fee-based accounts	We only offer fee-based accounts. There are no products sold to clients for investment purposes that include embedded compensation. Disclosure of all fees and charges are disclosed in the Letter of Engagement and



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	Relationship Disclosure Document at time of account opening. Annual fees and operating charges paid each calendar year are reported via annual reports.
Addressing conflicts between clients	We disclose to our clients that our services are not exclusive in our Letter of Engagement. There is no cross trading of securities between our client accounts and a summary of our fair allocation of investment opportunities policy is disclosed in our Relationship Disclosure Document.
Referral arrangements	We do not currently have any referral arrangements. Should a referral arrangement be entered into, specific disclosure would be provided to that client.
Control or authority over the financial affairs of a client	Should we have control or authority over the financial affairs of a client, the client will receive full disclosure of the conflicts and potential conflicts of interest.
Individuals who have outside business activities	All outside business-related roles or relationships, such as directorships or trusteeships of any kind, or paid or unpaid roles with charitable organizations, must be approved in advance.
Trade Execution - best execution.	Each trade is individually assessed to ensure best execution and a summary of our best execution policy is disclosed in our Relationship Disclosure Document.
Use of Commissions - soft dollar arrangements	We do not directly use client commissions or enter into soft dollar arrangements. A summary of our soft dollar policy is disclosed in our Relationship Disclosure Document.
Trade Errors	In the instance of a trading error, where a client has been negatively impacted their account will be made whole.
Personal Trading/Owning the Same Securities as Clients	Our owners and employees own the same securities as clients. We think this provides aligned interests between the us and you. When we invest in the



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	same securities as our clients, we have personal trading policies and procedures to monitor personal trades. The reporting of personal securities transactions and employees provide an annual acknowledgement of compliance with the trading policies and procedures.
Employees or RT Mosaic receiving gifts may create incentive to allocate trades or custody business of clients.	Our Gift Policy requires all gifts above \$200 be formally approved by our Chief Compliance Officer (CCO). All gifts are discussed in the general course.
Marketing with misleading or inaccurate performance.	All marketing material is reviewed and requires approval from our CCO prior to publication.