

Relationship Disclosure Document

July 2022

Please review and retain this document.

This Relationship Disclosure Document (RDD) contains important information concerning our relationship with you. It contains information about us, the services and products that we offer, the nature of your account(s) with us, manner in which they are operated and our responsibilities to you. Additional important information you need to know about your relationship with us is contained in other documents we provide to you such as account opening forms, trade confirmations, month end statements, and the updates we provide to you from time to time about any changes that have occurred to the information that you have received from us. Specific documents that you may receive from us during the course of our relationship are discussed later in this document.

ATB Capital Markets Inc. (ATB Capital Markets) is a registered investment dealer under provincial securities laws and is a member of the Investment Industry Regulatory Organization of Canada ("IIROC"). ATB Capital Markets Inc. is a wholly-owned subsidiary of ATB Financial. ATB Capital Markets is known as an "integrated" investment firm since we provide a broad range of corporate finance, institutional trading and retail client services and products. You can learn more about our firm at atbcapitalmarkets.com.

Our Relationship with You

Pursuant to securities industry regulations, your account is described as an "advisory account." This means that you are responsible for investment decisions. Your advisor can make recommendations but cannot make investment decisions for you. When making recommendations, your advisor must meet an appropriate standard of care, provide suitable investment recommendations and provide unbiased investment advice. Any investment action we direct or recommend to you will be suitable and put your interests first. ATBCM does not primarily offer any proprietary products. We do not have any general limitations on the types of products or services noted below but reserve the right to refuse transactions for certain securities. Generally, while most investment products can be readily liquidated or sold, depending on the security, there may be limitations or restrictions in some instances.

Products and Services Offered

Account Types

- Cash (investment) accounts
- Margin accounts (loans)
- Self-directed retirement plans (RRSP, RRIF, etc.)
- Registered Education Savings Plans (RESP)
- Tax-Free Savings Account (TFSA)

Services

- Investment recommendations
- Comprehensive portfolio reviews
- Financial needs assessment
- Online account access
- Retirement planning
- Estate planning
- Facilitate access to third parties including Private Banking and Trust Services

Investment Products

- Cash and cash equivalents
- Equities including warrants
- Investment funds such as mutual funds
- Fixed income and debt securities (e.g. bonds, debentures, strip-bonds)
- Alternative investments such as grey market issuers

Suitability Assessment

Securities regulations require that we use due diligence to ensure that orders accepted from you and recommendations made to you are suitable for you, based on factors including your financial situation, investment knowledge, investment objectives and time horizon, risk tolerance, current portfolio compensation and risk level. As a result, we reserve the right to decline to accept orders to purchase securities if, in our opinion, they are not suitable based on such factors. Upon opening your account, your advisor will request information from you related to these factors, which will be used to assess the suitability of investments recommended and orders accepted.

You will be provided with a copy of this information in the New Client Application Form (NCAF). Please review this form carefully to ensure that all of the personal and financial information recorded is accurate before signing the form. After your account has been opened, you will receive a copy of the NCAF for your records. Please review the NCAF carefully and advise us promptly if any of the information is not accurate. If there is a material change to your personal or financial information – such as your employment status, income or financial resources, investment objectives or risk tolerance – at any time after you open your account, please tell your advisor about these changes so that we may update our records and continue to provide suitable advice. If you do not tell your advisor about these changes, we cannot ensure that any further recommendations made to you or orders accepted from you will be appropriate for you. If there is a material change in your personal or financial circumstances that results in a change to the information that we have on record, we will send you an updated NCAF which includes these changes. Please review this document carefully and advise us promptly if any of the information is not accurate.

Your advisor will review your account holdings to assess their suitability in the following circumstances:

- When an order is accepted;
- When a recommendation is made;
- When you deposit or transfer securities into your account;
- When there is a material change in your personal or financial circumstances that results in a revision of the information that we have on record;
- When there is a change of the advisor responsible for your account;
- When we become aware of a significant change in a security in your account that could result in your account not meeting suitability requirements.

Other events, such as significant market fluctuations, may not result in a review of the suitability of your existing investments. Please contact your advisor if you wish to review the suitability of your investments at any time.

Although we will endeavor to ensure that the investments you own are suitable for you, it is important to note that the value of individual securities (unless specified) is not guaranteed. The value of securities and your investment portfolio as a whole can fluctuate, and you could lose part or all of the value of any investment. Unlike bank accounts or GICs, your stocks, bonds and mutual funds are not covered by the Canada Deposit Insurance Corporation or another deposit insurer. The Canadian Investor Protection Fund (CIPF) covers losses of clients of IIROC member firms resulting from the insolvency of a member firm, within specified limits, but the CIPF does not insure against investment losses resulting from loss of value of securities.

Trusted Contact Person

When you open an account with us, we will ask you for the name and contact information for a trusted contact person and your consent to contact the Trusted Contact Person in certain circumstances. A Trusted Contact Person is an individual identified by you who your Investment Advisor can reach out to if there are concerns of financial exploitation, or if we have concerns about your mental capacity as it relates to your ability to make financial decisions. Financial exploitation generally means the use or control of, or deprivation of the use or control of, a financial asset through undue influence, unlawful conduct, or another wrongful act. We may also contact your Trusted Contact Person to confirm your current contact information if we cannot reach you after multiple attempts, or to confirm the name and contact information of a legal guardian, if any. You can replace or revoke your Trusted Contact Person at any time.

Temporary Holds

If we reasonably believe that you are in a vulnerable position and are being financially exploited or that you are experiencing diminished mental capacity which may affect your ability to make financial decisions relating to your account(s) with us, we may place a temporary hold on your account or on a particular transaction. A vulnerable position is where an illness, impairment, disability, or aging-process limitation places you at risk of financial exploitation. If we place a temporary hold on your account or on a particular transaction we will notify you as soon as possible. We may also contact your Trusted Contact Person about a temporary hold.

Account Reporting

You will receive an account statement from us after the end of each month when there has been any activity in your account (other than dividend and interest) during the month. You will receive a quarterly statement if you held any cash or investments in your account at the end of the quarter. You will also receive a trade confirmation each time you purchase or sell a security, other than transactions resulting from systematic plans such as dividend reinvestment or pre-authorized purchases or sales of securities on a systematic basis. You may also receive or view your statements, trade confirmations and tax documents electronically. Please contact your advisor for more details on electronically accessing your documents. Please review all statements and trade confirmations carefully and advise us promptly if you believe there are errors or if you did not authorize any of the transactions reported.

Your monthly or quarterly statement will show the adjusted cost base of securities held in your account. If the securities were purchased elsewhere and transferred into your account, the cost base shown will be based on the information, if any, provided when the securities were received by us, and we cannot guarantee the accuracy of that information. Please consult your advisor if you wish to obtain performance reporting information regarding the investments held in your account.

Investment Expenses

In the course of making, holding and disposing of investments in securities, you may incur the following expenses for commission-based accounts:

Stocks: When buying or selling stocks that trade on a marketplace, you will normally be charged a commission for our services as agent in the transaction. For each trade your advisor will provide you with a commission amount that will be applicable on that specific trade. There is no ongoing charge for holding stocks in your account.

Bonds: When you purchase a bond or similar fixed-income security, we are normally selling the security to you from our inventory, that is, we are acting as principal in the transaction. The price that you pay for the security normally includes a markup from the price that we paid for the security when we purchased it from another dealer. Likewise, if you wish to sell a bond that you hold in your account, the price that we offer to you will normally be less than the price that we anticipate we could sell it for in trading with other dealers. In each case, the markup or markdown represents the revenue that we earn from effecting the transaction. There is no ongoing charge for holding fixed-income securities in your account.

Mutual funds: Most mutual fund companies provide various options for the cost of buying, holding and disposing of units of the fund. For purchases of a "front end load" fund, there may be an acquisition cost that is charged directly to you and deducted from the amount that is invested in the fund. There is no charge for the redemption of these fund units.

Alternatively, you may choose to purchase a fund with a deferred sales charge ("DSC.") When you purchase fund units on this basis, the fund company pays a commission directly to us rather than deducting it from the amount invested. When you redeem units of a DSC fund, the fund company will deduct and retain a redemption charge, if the units are sold before the redemption fee schedule expires. Although we do not apply an ongoing charge for holding mutual funds in your account, the mutual fund company will charge its expenses for the management and administration of the fund to the unit holders of the fund, which may include trailing commissions paid to ATB Capital Markets, and these charges will be deducted from the value of the fund. Mutual fund companies may also assess charges for short-term trading or switching. Details of these charges are outlined in the fund's prospectus and in the Fund Facts document. Both of these documents are available from your advisor, from the fund company's website and on the SEDAR website (sedar.com).

For fee-based accounts, a fee will be applied monthly or quarterly against your account. The fee is calculated as a percentage of the value of the assets. Commissions will be charged if the number of trades per year exceeds the amount specified in your Fee-Based Account Agreement.

Account Service Fees and Charges

Please refer to the Fee Schedule for a description of service fees and charges that may apply to your account.

Conflicts of Interest

Please refer to the ATBCM's Conflict of Interest Statement.

Complaint Handling Procedures

If you have a problem, or concern regarding the handling of your account, there are several options available to resolve such issues.

- In the first instance, please contact your advisor to discuss any problems or concerns regarding your account.
- If you are not able to resolve an issue directly with your advisor, or your complaint involves possible misconduct or violation of industry rules, please contact our Chief Compliance Officer (CCO) at:

410, 585 8th Avenue SW
Calgary, AB T2P 1G1
atbcm_compliance@atb.com
403-539-8600

Performance Benchmarks and How to Use Them

You may assess the performance of your investments by comparing them to an investment performance benchmark. Benchmarks show the performance over time of a select group of securities. There are many different benchmarks. When choosing a benchmark, pick one that reflects your investments. For example, the S&P/TSX Composite Index follows the share prices of the largest companies listed on the Toronto Stock Exchange. This index would be a good benchmark for assessing performance of a Canadian equity fund that invests only in large Canadian companies. It would be a poor benchmark if your investments are diversified in other products, sectors or geographic areas.

We do not provide benchmark comparisons in our account reporting. Currently, we do not provide percentage returns on our statements.

Documents Provided

We will provide you with the following documents with respect to your account, but not limited to the following: New Account Letter, Conflicts of Interest Statement, NBIN Accounts and Services Agreement and Disclosures for Introducing Brokers, Canadian Investor Protection Fund (CIPF) brochure, An Investor's Guide to Making a Complaint, How IIROC Protects Investors, IIROC Strip Bonds and Strip Bond Packages Information Statement, Relationship Disclosure Document and ATB Capital Markets Current Fee Schedule.

Updates

If there are material changes to this Relationship Disclosure, we will post them on our website at atbcapitalmarkets.com. You can also obtain a current version of the Relationship Disclosure at any time from your advisor.