

Instructions

Please provide the following information for **REGISTRANT** (“Registrant”). Unless otherwise indicated please provide the requested records for the time period **START DATE** to **END DATE** (“review period”). Please upload the requested materials to the kiteworks link provided.

Copies need not be made for those records for which only access is requested. However, please have such records collected and ready for the staff’s review. While certain books and records are specifically requested below, during the review the staff may request additional books and records if it becomes necessary.

During the review, the staff will also ask to interview persons responsible for various functions [such as transfer agent, fund accounting, trust accounting, marketing, compliance and supervision, portfolio management and trade execution]. To obtain an overall view of the Registrant’s business and its internal control environment, we will also speak with senior management early in the review process.

GENERAL

1. A copy of the Registrant’s most recent organization chart (indicating all related/associated companies and subsidiaries).
2. A list of all affiliated parties to the Registrant, and the nature of the relationships.
3. A list of any joint ventures or any other businesses in which the Registrant or any of the Registrant’s (or related parties’) officers or director, portfolio manager or traders participates or has any interests.
4. A copy of most recent personnel organization charts, management structure and employee list with telephone numbers.
5. Business cards of all individuals who deal with clients, suppliers, and the public.
6. For the individuals on whom the Commission has imposed “close supervision” terms and conditions, please provide the policies and procedures you have in place to supervise the individuals.
7. A list of branch and sub-branch offices of the Registrant, both active and dormant during the review period, and a description of the functions of each branch.
8. A list of any outstanding claims filed by or against the Registrant, identifying the nature of the claim and their expected outcome.
9. A copy of the complaint log and access to complaint files for the review period.

10. Copies of any internal audit reports issued during the review period and the response from management.
11. Copies of any management letters issued during the review period by the Registrant's external auditor as a result of their annual audit, including a copy of management's response.
12. Copies of all minutes of meetings of the Board of Directors, Trustees, Audit Committee, Investment Committee or other committees during the review period.
13. A copy of the most recent annual compliance report provided to the board of directors, or individuals acting in a similar capacity.
14. A copy of the policies and procedures manual.
15. A list of all active exemptions filed with and received by the Commission including those for each of the Registrant's funds.
16. A list of third-party service providers and an explanation of the service provided.
17. Access to any contract or agreement executed by the Registrant with other third parties. (i.e. service provider, custodian, on-line portals, agency agreements with issuers).
18. A list of and access to all personal trading accounts of key personnel of the Registrant and family members who live in the same household.
19. A log of all instances of non-compliance with the Registrants' Code of Ethics and internal policies on personal investing for the review period, including their resolution.
20. A copy of the Registrant's business continuity plan.
21. A sample of agreements with employees (or each type of templated agreement), including:
 - Standard employment contracts (for example, templated contracts with dealing representatives ("DRs"), advising representatives ("ARs"), associate advising representatives ("AARs"), compliance staff, etc.)
 - Severance, settlement or other relevant agreements entered into with employees who have been terminated or have resigned
 - Non-disclosure and confidentiality agreements entered into with current employees

22. A list of both outstanding and closed employment-related and breach of confidentiality claims filed by or against the registrant, identifying the nature of the claim and the expected outcome.
23. A list and description of investigation files relating to breaches of confidentiality policies.

Financial Condition and Custody

24. A copy of the Registrant's financial statements as at the end of the review period.
25. A copy of the excess working capital calculation at the end of the review period and access to those during the review period
26. Access to monthly financial statements, trial balance, and general ledger for the review period
27. A list of all the Registrant's bank accounts, including the name on the account, the account number and the financial institution where the account is held.
28. Access to bank statements, deposit books, cancelled cheques and bank reconciliations for all trust accounts of the Registrant for the review period.
29. If the Registrant, its related persons or affiliates have custody or possession of, or access to any client funds or securities, a list (in spreadsheet format) which includes:
 - a. the names of all such clients,
 - b. the current market value of all assets in possession or to which the Registrant has access, and
 - c. the location(s) where such assets are held or the name(s) of the firms holding them.

Marketing

30. A list of all marketing material used during the review period.
31. Access to marketing materials used during the review period.
32. If the Registrant makes information about its services available on the Internet, the address at which such information is available.
33. A list of all online advertising service providers used during the review period (e.g. Google AdWords).
34. A list of all social media platforms, including usernames, used by the Registrant and/or its registered employees during the review period.

INVESTMENT FUND MANAGER RECORD REQUEST

General

35. Access to copies of the management agreement between the Registrant and the mutual funds.
36. A list of all dealers used to distribute the investment funds, including their registration category.
37. Access to all distribution agreements.

Nature of Business

38. A listing of all funds in which the Registrant acts as the fund manager. For each fund product, indicate the following:
 - a. the assets under administration for each fund as of the end of the review period
 - b. the legal structure of the fund (i.e. trust, corporation, limited partnership)
 - c. the type of fund (i.e. NI 81-102 fund, hedge fund, pooled fund)
 - d. whether it is a fund of fund
 - e. name of the portfolio manager for each fund
 - f. name of the fund's custodian
 - g. percent of illiquid securities held by the fund as of the end of the review period.
 - h. the frequency of the net asset value calculation
39. A list of holdings for each fund as of the end of the review period.
40. A list of transactions by each investment fund in related issuers. Indicate whether the issuer is traded on an exchange.
41. A written description of how the firm monitors the fund's portfolio compliance with stated restrictions and securities legislation.
42. Copies of the most recent offering documents for the Registrant's funds (for all non-prospectus funds/products).
43. Access to all advisory contracts for the Registrant's funds.
44. Copies of reports issued on the control environment of the service providers (CSAE 3416 report).
45. Access to the service agreements with the following third-party service providers:
 - a. Fund Administrator

- b. Transfer Agent
- c. Trust Accountant
- d. Custodian

Conflicts of Interest

- 46. A copy of the policies and procedures governing the Independent Review Committee (IRC).
- 47. A copy of all conflicts of interest matters including all standing instructions relied on by the Registrant.
- 48. A copy of all reports prepared by the IRC to the Registrant.
- 49. Copy of all IRC minutes during the review period.
- 50. A list of cross transactions executed during the review period (including all inter-fund trades and cross trades between managed accounts).

Transfer Agent (In-House)

- 51. A log of cancelled orders and trading errors.
- 52. Access to reports used by management during the period to monitor and resolve long outstanding trades, if available.
- 53. Access to reports used by management during the period to identify non-financial changes to client accounts (i.e. address, name, account number), if available.
- 54. Access to reconciliations of unitholder balances between the transfer agent ledger and funds' equity ledger for the period under review.
- 55. Access to copies of transaction confirmation notices issued to clients.
- 56. A copy of any notices provided to unitholders.
- 57. A list of any items requiring unitholder approval.
- 58. Access to unitholder trade blotters for the review period. If possible, provide the information in chronological order with the following fields of data:
 - a. Date order received
 - b. Trade date
 - c. Settlement date
 - d. Purchase or redemption
 - e. Number of unit or amount
 - f. Gross value of order

- g. Name of fund
- h. Value per unit
- i. Total commission
- j. Fees
- k. Net amount to/from client
- l. Client name
- m. Client account and number
- n. Sales rep/dealer name

If possible, please provide the above in Microsoft Excel electronic format.

Fund Accounting (In-House)

- 59. The most recent unaudited and audited financial statements for non-prospectus qualified investment funds.
- 60. Copies of reports issued on the control environment of any service provider who provides market values for securities to the Registrant for purposes of fund pricing.
- 61. A list of private placements, equity or debt securities issued by private companies, illiquid, thinly traded or OTC securities held by each investment fund including the percentage of the fund's NAV each holding represents.
- 62. A list of all securities for which the valuation used did not follow the firm's valuation policy including the percentage of the fund's NAV the holding represents.
- 63. A log of all manual adjustments (price overrides) made by the fund manager to pricing recommendations of third party pricing vendors (including the rationale for the price used).
- 64. Access to exception reports used by management during the review period to monitor fluctuations in daily NAV and individual securities' prices, if available.
- 65. Access to reconciliations between the investment sub-ledger and custodian statements, for the period under review.
- 66. A list of NAV pricing errors that have occurred during the review period, including date and amount of error, if applicable.
- 67. A detailed list of all expenses charged to the funds.
- 68. A list of funds that were charged a performance fee during the review period. For each fund listed include the amount of the performance fee charged and the AUM of the fund at the end of the review period.

Trust Accounting (In-House)

69. A list of all trust accounts.
70. A list of the types of transactions processed in the trust accounts.
71. Access to reconciliations between the trust accounting records and trust account bank statements for the period under review, including supporting documentation for all reconciling items.
72. Access to bank statements for all trust accounts for the period under review, including all supporting documents for the review period.
73. Access to calculations of the allocation of interest earned in the trust accounts to fund investors for the period under review.
74. Access to copies of all banking resolutions between the Registrant and the Bank.

Sales Practices

75. A list of the top twenty producers (name of the sales representative and the participating dealer) associated with the distribution of the Registrant's funds.
76. A copy of the budget governing the Registrant's expenditures on sales practices.
77. A list of sales practices requests received but rejected by the Registrant.
78. A list of all co-operative marketing items and events where the Registrant has paid a portion of the direct costs during the review period. The list should include, at a minimum, the following information:
 - Date of the event
 - Name of the participating dealer who made the request
 - A brief description of the event
 - The amount paid to the participating dealer
79. A list of conferences and/or seminars organized, presented and sponsored by the Registrant and attended by participating dealers during the review period. The list should include, at a minimum, the following information:
 - Date of the conference/seminar
 - Location of the conference/seminar
 - A brief description of the nature of the conference/seminar
 - Total costs incurred
80. A list of other conferences or seminars organized and attended by participating dealers and sponsored by the Registrant during the review period. The list should include, at a minimum, the following information:

- Date of the conference or seminar
- Location of the conference or seminar
- A brief description of the conference or seminar
- The amount paid to the participating dealer