Citigroup Global Markets Canada Inc. Order Handling 2023

With multiple marketplaces in Canada, Citigroup Global Markets Canada Inc. ("CGMCI") wishes to advise our clients of how CGMCI handles their orders. Please be advised that unless our clients provide us with specific instructions to the contrary, the following policies will apply to all client orders.

All Canadian orders listed on the Canadian marketplace are routed via CGMCI's affiliate Citigroup Global Markets Inc. to Virtu Canada Corp. for execution in the Canadian marketplace. Virtu Canada Corp's Best Execution and Order Handling Disclosure Policy may be found by clicking here under the Virtu Canada Corp. Regulatory Disclosures section specifically the Best Execution and Order Handling Disclosures link.

1. Hours of Operation

For Canadian listed equities, the CGMCI trading desk will be available to accept orders for execution between the hours of 8:30 a.m. and 5:00 p.m., Eastern Time ("ET"), Monday through Friday, not including Canadian statutory holidays. Staff may be further available for assistance before and after these hours.

Marketplace	**Standard Trading Hours**
CSE	9:30 a.m. to 4:00 p.m.
Nasdaq CXC	8:00 a.m. to 5:00 p.m.
Nasdaq CX2	8:00 a.m. to 5:00 p.m.
Omega ATS	8:00 a.m. to 5:00 p.m.
TSX/TSXV	9:30 a.m. to 4:00 p.m. TSX Extended Hours Trading: 4:15 p.m. to 5:00 p.m.
Aequitas Lit Book	9:30 a.m. to 4:00 p.m.
Lynx ATS	8:00 a.m. to 5:00 p.m.
Aequitas Neo Book	Equities – 6:00 a.m. to 5:00 p.m. Platform Traded Funds. 7:00 a.m. to 6:45 p.m.
TSX Alpha	9:30 a.m. to 4:00 p.m. Extended hours trading: 4:15 p.m. to 5:00 p.m.
ICX	9:30 a.m. to 4:00 p.m.
Liquid net	9:30 a.m. to 4:00 p.m.
Match Now	9:30 a.m. to 4:00 p.m.
Nasdaq CXD	9:30 a.m. to 4:00 p.m.

2. Best Execution and Price Improvement Opportunities

It is our goal to always provide our clients with Best Execution. CGMCI will take all reasonable steps to obtain the best possible results for its clients on a consistent basis. Virtu Canada Corp. (the executing broker) evaluates multiple considerations relevant to the execution of an order in its routing methodology listed here. To achieve the best available price, the Virtu Canada Corp. will seek out price improvement opportunities in alternative marketplaces. Any unfilled balances route immediately to the "Best Market" for execution or booking.

Between the hours of 9:30 a.m. ET and 4:00 p.m. ET, "Best market" is defined as the market(s) that provides pre-trade transparency and has the best bid (buy price) or offer (sell price) and/or best historical liquidity and where Citi feels the order has the highest probability of execution. As noted above, orders received before 9:30 a.m. and after 4:00 p.m. will be directed to TSX or TSX-V unless otherwise directed by the Client.

3. Day Orders

A Day Order is an order that is only valid on and for the day it is entered. Day Orders will only be valid until the closing of the market on which they are booked (e.g., TSX and TSX-V day orders will expire at 5:00 p.m. ET). A Day Order received prior to the opening of the TSX and TSX-V at 9:30 a.m. ET will not route to an alternative marketplace. Instead, the order will route into the opening sequence of the Principal Marketplace. The order will expire, if not filled in full, on the market where the last portion of the order remains live, and the Market has closed for the day. Any remaining unfilled amounts from your Day Orders will not be automatically moved to another marketplace after the close of TSX and TSX-V. A new order is required to participate in any other marketplace that may still be open for trading.

4. Good-To-Cancel ("GTC") Orders

As a default, all client orders, unless otherwise confirmed back to the client as a GTC order, will be Day Orders and expire at the end of the day they were received.

5. Market and Limit Orders

A Market Order is an order to buy or sell that is to be executed immediately within the context of the marketplace. Limit Orders are orders to buy or sell at a specified price or better. Market Orders and Limit Orders received before 9:30 a.m. ET will be entered on TSX or TSX-V with the intent to participate in the Marketplace opening rotation.

6. Market on Close Orders

A Market on Close ("MOC") order is intended to trade on the close, at the calculated closing price, of the Principal Marketplace. To participate in the MOC match at 4:00 p.m., orders must be entered by 3:50 p.m. All orders before 3:50 p.m. must be Market Orders. Offsetting Limit orders can be entered to satisfy the imbalance published from 3:50 p.m. until 4:00 p.m. TSX will then calculate the closing price and publish it at 4:10 p.m. There is no guarantee that the MOC order will be completed. The TSX MOC is an anonymous price facility. Therefore, you will not know the price and volume of your execution until after execution has completed.

7. Special Terms Orders (i.e., delayed settlement, all-or-none and minimum size)

Special Terms Orders are orders with specific terms which are not immediately executable in the regular marketplace. As of January 19th, 2009, All-or-None (“AON”) orders are no longer permitted for the TSX and TSX-V. As a matter of practice this order type will no longer be available for Canadian Marketplaces. Other special terms orders such as minimum size orders will only be posted to the Special Terms Market of the TSX or TSX-V. Client’s should request guidance from the CGMCI trading desk on entry of all other special terms orders that would include non-standard settlement (short or delayed), short exempt, insider or significant shareholder order markers and specialty crosses such as internal cross or VWAP cross.

8. Fill or Kill (“FOK”) Orders

FOK Orders will hit the market, either receive a fill, or expire. FOK orders can receive both full and partial fills. Depending on the marketplace who may define a FOK Order to operate as an all-or-kill (not fill partial kill remaining) while an Immediate or Cancel (“IOC”) marker will fill partial, kill remaining. Consult with the CGMCI Sales desk or the Marketplace website for additional details.

9. Circuit Breakers Halts

Canadian Marketplaces will only halt when the US Markets (Dow Jones Industrial Average) reach circuit breaker triggers. If the US markets are closed for a Holiday, then the Canadian Circuit Breaker is based on the decline of the TSX. The Canadian Markets do not have independent circuit breaker thresholds when the US markets are open.

CGMCI’s affiliate reserves the right cancel all open client orders on Canadian during a halt or as soon as the Marketplace starts a reopening session or general open, whichever occurs earlier. Once cancels have been submitted to all destinations and Marketplaces, CGMCI will start to accept new orders. This means that clients will have to resubmit new orders and re-establish priority in the Marketplace. This uniform approach is to ensure that clients have an opportunity to reevaluate price levels and to be consistent with how US bound orders are treated.

10. Single-Stock Circuit Breakers

From time to time, CIRO will intervene to vary or cancel trades in a stock when there have been “erroneous and unreasonable orders and trades” that have comprised Canadian market integrity. Virtu Canada Corp. has in place several controls to prevent erroneous trades from reaching the marketplace, as described in the Risk Limits section below.

Single-Stock Circuit Breakers apply to each security that is a constituent of the S&P/TSX Composite Index and any Exchange Traded Fund ("ETF") the assets of which is comprised principally of listed securities. In the event of a price increase or decline of at least 10%, trading in the stock is halted for a 5-minute period, which may be extended for an additional 5 minutes. Any trade that executes at more than 5% beyond the trigger price will be cancelled. Single-Stock Circuit Breakers apply from 9:50 a.m. to 3:30 p.m. EST.

In the event of a Single-Stock Circuit Breaker, upon notification from CIRO that trades in a certain stock in a specified price have been modified or cancelled, CGMCI will reach out to impacted clients.

11. Details of Order Execution and Marketplaces

The details of your trade executions, including individual execution prices when averaged and marketplaces will be made available upon requested at no additional charge.

12. Request for additional order details

If you have any questions about this policy or to request details on your orders please contact your Account Executive, the CGMCI Institutional Sales Desk at 416-947-5302 or our Compliance Department at 416-947-5537.

13. Complaints

Additional information on how to resolve a complaint can be found on the CIRO website:

https://www.ciro.ca/have-complaint-or-question

You may also contact CGMCI's Designated Complaints Officer and Chief Compliance Officer, Nigel Bell, by email at Nigel.Bell@citi.com, by phone at 416-947-5537 or by mail at the mailing address below:

CGMCI, Attention: Compliance Department, 123 Front Street West, 16th Floor, Toronto, Ontario M5J 2M3.

DISCLAIMER: This policy has been prepared solely for informational purposes only and is not intended to provide financial, legal, accounting or tax advice and should not be relied upon in that regard. Although the information contained in this policy has been obtained from sources that CGMCI believes to be reliable, we do not guarantee its accuracy, and as such, the information may be incomplete or condensed. The information provided is as of the date hereof and is subject to change without notice. CGMCI (Member Canadian Investor Protection Fund and Canadian Investment Regulatory Organization) is registered as an Investment Dealer. Consultative and related services by CGMCI do not constitute tax or legal advice.