Relationship Disclosure Information – November 2026

Description of Paradigm Capital Inc.

Paradigm Capital Inc. ("Paradigm") is an independent, research-driven investment dealer, and a member of the Canadian Investment Regulatory Organization ("CIRO"). Paradigm sales and trading focuses on companies that Paradigm covers via research services. Our investment banking team provides advisory and corporate finance services, mainly to Canadian corporate issuers. Paradigm espouses teamwork and long-term relationships that are the key to exceptional success and growth.

Paradigm believes in a dynamic work culture, and a high standard of ethics.

Paradigm's principal clients are institutional money managers and corporate issuers; the firm has a very limited number of retail client accounts. Importantly, Paradigm does not provide the full range of services of a traditional retail investment dealer.

Purpose

This Relationship Disclosure Information ("RDI") is designed to help retail investors of Paradigm clearly understand the nature of the services that can be provided by their Paradigm advisor, and the necessary elements to ensure a satisfactory ongoing relationship. This document reflects the Client Focused Reforms ("CFR") that came into effect in 2021 (Link). References to "client" in this document mean a retail client. Paradigm is almost exclusively an institutional investment dealer, with less than 5% of its overall accounts held by clients which do not meet the definition of "institutional". Retail accounts are an important element of our business, however, and as such we take appropriate steps to implement CFR requirements for the protection of our firm and our clients.

Delivery

Paradigm uses its website www.paradigmcap.com as its repository for its RDI. All new and existing customers of Paradigm who have accepted electronic delivery method of materials, including RDI, can rely on its delivery via the Paradigm website, as per Section 14.2 of National Instrument 31-103, effective June 30, 2021.

Compliance Contact Information

This document will explain the nature of the roles and responsibilities that both the client and advisor should follow to maintain a successful relationship. Please direct any questions about this document to Paradigm's Chief Compliance Officer at compliance@paradigmcap.com.



Information Contained Within Document

- Know Your Client (KYC)
- Services
- Know Your Product (KYP)
- Investment risks
- Investment Suitability
- Client Focused Reforms ("CFR")
- Conflict of interest management
- Account fees and charges
- Client transaction and account reporting
- Trusted Contact Person (TCP)
- Complaint Handling Procedures
- Agreements & Disclosures

Know Your Client ("KYC")

Paradigm almost exclusively has institutional customers. The few retail customer accounts which are not Paradigm employee or family accounts are accounts for sophisticated, accredited investors. Accounts held at Paradigm by a retail client do not reflect the entire portfolio of the client, and those clients are not looking to Paradigm to provide investment or portfolio advice. These clients are investors with sufficient capital, risk tolerance and time horizon to invest in new issues offered by Paradigm, which are often speculative investments.

It is a regulatory imperative that the information provided by clients be accurate and kept up to date. As such, clients must immediately keep Paradigm apprised of any significant changes that could impact the operation of their account(s), including changes to marital status, employment income, or other changes.

Paradigm will contact retail clients on a periodic basis to ensure that any changes are noted on file, and any relevant changes are made, if necessary. Paradigm will provide retail clients with a copy of any KYC information obtained from the client and documented at the time of account opening, as well as any time significant changes are made to a client's KYC information.

Services

Paradigm only offers advisory accounts to retail investors. In an advisory account the client is ultimately responsible for investment decisions. The advisor is responsible for any advice given. In providing this advice, an advisor must meet an appropriate standard of care, give suitable investment recommendations, and present unbiased investment advice, consistent with the KYC information provided by the client.

Any trade instructions for retail accounts at Paradigm will be confirmed by phone by the Registered Representative on the account to ensure accuracy, even if the original instruction was received by email.

Know Your Product ("KYP")

Products Available through Paradigm

It is a requirement of CFR that an investment dealer approve any "product" which is offered to its clients. As with all aspects of regulation, CIRO accepts a risk-based approach to the diligence a dealer performs on products it will make available to clients. CIRO's guidance notes state that formal, intensive product-by-product diligence is intended for complex, non-transparent, or structured products - not ordinary exchange-traded stocks.

Paradigm offers its retail clients ordinary exchange-traded stocks. Paradigm does not offer bonds, government debt, money market or securities traded outside the US or Canada to its retail clients.

Risks

Investment Risks

Understanding risk and knowing an individual's comfort with risk is an important part of investing. Risk may be defined as the measurable possibility of a future investment loss or gain, including the prospect of losing some or all of the original investment in addition to any funds borrowed on margin and the associated interest costs. Risk is a common indicator of the volatility of the value of a security or market. Volatility is a measure of the rate or degree that the price of a security or investment fluctuates over time.

Risk Profile:

An individual's risk profile encompasses both risk tolerance, willingness to accept risk, and risk capacity, ability to sustain a loss.

Risk Versus Return:

It is unrealistic to expect to receive a high return without incurring any risk. In reality, risk and return are related. To seek higher returns, investors can choose investments with higher risk profiles, but must understand they can lose all their capital. The amount of risk that a client is comfortable with is their risk tolerance. How a client feels about risking their capital will drive many of the investment decisions. The risk comfort scale extends from very conservative low risk, where the client does not want to risk losing a penny regardless of how little their investment earns, to the very aggressive high-risk client who is willing to risk all of their investment for the possibility that it will grow considerably.

Risk Tolerance:

An individual's risk tolerance may be affected by a number of factors including:

- Age
- Family situation
    - marital status
    - number and ages of dependants
    - education
- Net worth
    - Assets
    - Liabilities
- Investment Income needs and expectations
- Income sources and amounts
- Investment time horizon
- Insurance coverage and cash reserves

Risk Capacity:

A person's financial situation including their assets, debt, and the amount and stability of their income are all important when determining how much risk they can take with their investments. In addition, the larger the portion of a client's total assets they are investing, the more conservative they may wish to be with this portion of their portfolio.

Paradigm assigns a risk capacity score at account opening based on a client's answers to various questions regarding their ability to sustain loss. This helps determine which investments are suitable for the account, based on a client's unique situation.

Careful discussions with one's advisor to identify their own personal risk tolerance and capacity is essential.

Common Risks

Generally speaking, risks can be classified as market-related or security-specific.

Market-Related Risks

Risk factors that every investor is subject to irrespective of specific investment holdings include:

Market risk -- Most investments are subject to the risk of a general market decline in response to changing conditions in the domestic or global economy. These market-wide changes can be unpredictable and beyond anyone's ability to forecast.

Inflation risk -- Inflation reduces an individual's future purchasing power and their real investment returns.

Interest rate risk -- Interest rates changes affect the value of fixed income securities. An increase in interest rates will result in a drop in the market value of a fixed income security.

Foreign exchange risk -- Foreign exchange rate changes affect the value of investments that are traded in a foreign currency.

Security-Specific Risks

Risk factors which can affect the value of a specific investment holding include:

Product risk -- Stocks generally carry a higher level of risk than bonds. Short-term government debt securities are essentially risk-free, with the degree of risk increasing with longer-term government bonds, investment grade corporate bonds and other corporate bonds.

Concentration risk – a high concentration of assets in a single or small number of issuers may reduce diversification and liquidity within a portfolio and increase its volatility.

Liquidity Risk – some securities may be illiquid because of legal restrictions, the nature of the investment itself, settlement terms, a shortage of buyers, or other reasons. In general, investments with lower liquidity tend to have more dramatic price changes and may subject the investor to losses or additional costs.

Business risk -- Business specific risk factors can affect a company's profitability. The failure of a new product, labour difficulties, high debt levels and the performance of competing firms are some of the specific risk factors which may contribute to a particular company's level of business risk.

Sector risk – certain sectors might be more volatile, or speculative, and thus have differing risk profiles.

Credit Risk – the riskiness of an issuer due to its debt obligations and ability to repay outstanding debt.

Foreign exchange risk -- Foreign exchange rate changes affect the value of investments in companies that buy and sell products / services in foreign countries.

Reducing security specific risk

Security specific risks can be reduced by holding a well diversified portfolio of investments. A diversified portfolio starts by allocating a client's investments between debt and equity products. It



can also factor in diversification across sectors, and specifically to avoid over concentration in any security or sector.

The debt portion of the portfolio can be further diversified by purchasing debt of different terms and of different issuers, although all issuers should have an acceptable credit rating. The equity portion of the portfolio can be further diversified by buying shares of companies in different business sectors or based in different countries. If the client does not have a large amount of money to invest, they can diversify by investing in a pooled investment like mutual funds or exchange traded funds. Paradigm clients must decide their own asset allocation and specific security concentration. If they need full-service advice, such clients should seek a full-service retail representative at another firm.

CIPF protection from firm insolvency risk

The cash and security assets in the client's account are covered by the Canadian Investor Protection Fund ("CIPF"), details of these limits can be found at www.cipf.ca. Should the firm become insolvent. CIPF provides coverage up to CAD $1 million in cash per customer for securities in the account in the event a firm becomes insolvent. Note that registered accounts are treated as separate accounts.

CIPF coverage does not insure against market losses due to volatile markets, product suitability, or insolvency of an actual security in an account.

Personal Investor Risk Profiles for Paradigm Clients

Your Paradigm advisor will help you determine your comfort level with risk for the account you wish to open at Paradigm. That assessment of risk will be based on the information you provide.

• If you are a LOW RISK investor, one for whom an investment dealer should recommend investments that generally display a lower volatility and risk profile (with returns generated by such products generally lower, but likely more certain), Paradigm is not an appropriate firm to open an account.

• If you are a MEDIUM RISK investor, one for whom, in addition to lower risk products, an investment dealer should propose investments that include securities that may exhibit moderate volatility and a medium risk profile (with potentially higher returns, with increased volatility and risk), Paradigm is not an appropriate firm to open an account.

• If you are a HIGH-RISK investor, for whom an investment dealer should propose investments that may be unpredictable and speculative in nature (which may be subject to a greater risk of loss with a greater potential for returns), Paradigm is an appropriate firm to open an account.

Given the product offering at Paradigm, unless specific approval is obtained by the Chief Compliance Officer, all retail clients must be high risk investors.

Investment Suitability

CIRO member firms are required to evaluate the suitability of any order the firm accepts or recommendation the firm makes and ensure that the client's interests are put first. This determination is based on factors including a client's financial circumstances, investment knowledge, investment objectives, risk tolerance and time horizon. The regulatory expectations are that a firm will conduct a suitability assessment whenever:

- A trade is proposed by a client;
- A trade is recommended to a client;
- Securities are received or delivered into a client account by way of deposit or transfer;
- Securities are delivered out of a client's account by way of withdrawal;
- A firm becomes aware of a significant change in a security in a client account that could result in the account not meeting suitability requirements;
- There is a change to the Investment Advisor on the account;
- There is a material change in a client's KYC information;
- At any review of the client's information in accordance with IDPC Rules subsection 3209(4)

The suitability of the investments held in a client's account will not be reviewed in the case of triggering events not described above and, in particular, in the event of significant market fluctuations.

While an Investment Advisor may make recommendations with respect to suitable investments, the responsibility for all investment decisions lie with the client.

As Paradigm will only open accounts for clients with the highest range of risk tolerance, and as Paradigm will only approve products which are appropriate for investing clients with the highest risk tolerance, there will be very limited circumstances wherein a trade will not be suitable for a Paradigm retail client.

Client Focused Reforms ("CFR")

The Canadian Securities Administrators ("CSA") mandated the CFR which supplement the *Registration Requirements, Exemptions and Ongoing Registrant Obligations* found in National Instrument 31-103. Paradigm's business model with respect to non-institutional clients operates on the premise that any retail accounts opened at Paradigm will not form the whole portfolio of holdings by Paradigm retail clients.

Client must provide Paradigm with updates:

Paradigm will ask clients to provide at account opening and to be updated as necessary on the total Assets Under Management ("AUM") of the client. As the CSA recognizes, clients may not provide a full picture, or keep Paradigm informed of all portfolio changes.

Unsolicited Orders:

Paradigm will use its business judgment whether an order, even if unsolicited, as per section 13.3(2.1) of NI 31-103, is suitable for the customer. If the registrant deems the order to be unsuitable, it may ask the client to provide updated information to substantiate the suitability of the unsolicited order.

If the advisor determines that a transaction proposed by the client is unsuitable, they will advise the client of their assessment prior to executing the trade. Moreover, a firm will reserve the right not to accept an order to purchase a security if it is not in keeping with the client's investment or risk objectives.

To reiterate: Paradigm covers mostly speculative investments, and thus its retail clients must have a high tolerance for risk, as well as the ability to absorb any resultant losses.

Concentration:

Paradigm retail accounts typically hold a higher-than-normal concentration of one issuer. The client will have account(s) elsewhere which overall provide for a more balanced portfolio.

Referral Arrangements:

Occasionally customers will be referred to Paradigm. Should there be any referral fee attached to this referral, as per Section 13 of NI 31-103, there shall be both a referral arrangement made between Paradigm and the referring party, and a referral disclosure document sent to the underlying client who was referred to Paradigm.

Best Interests Standard:

The CSA has guided that Best Interest is dependent upon facts and circumstances, in which the materiality of a potential conflict must consider materiality, reasonability and professional judgment.

Conflicts of Interest

The CSA and CIRO stipulate that material conflicts of interest must be identified, addressed and disclosed appropriately.



CFR requires Paradigm to take reasonable steps to identify and respond to actual and potential material conflicts of interest, and to provide clients with information about these material conflicts. This document contains important information clients should read carefully about the key conflicts of interest we have identified.

In situations where Paradigm is providing services in which a conflict of interest might occur between the interests of Paradigm and the client, Paradigm will fully inform clients of these conflicts in a fair, equitable and transparent manner, consistent with the best interest of our clients.

Paradigm is an employee-owned commercial enterprise that has a responsibility to maximize the returns for its shareholders and customers alike. Paradigm earns compensation for investment banking services and trading. Clients should be aware of these fees, which are outlined below in this document.

Managing Conflicts of Interest

Under CIRO's rules, all existing or potential material conflicts of interest between a Dealer Member and a client must be addressed "in a fair, equitable and transparent manner, and considering the best interest of the client or clients". In applying this requirement, it is recognized that it is not always possible or practical for us to address all conflicts of interest in the best interests of each client when the conflict of interest involves multiple clients and competing interests.

The most common types of conflicts of interest that can occur are:

- Conflicts of interest between Paradigm and a client;
- Conflicts of interest between clients; and
- Conflicts of interest between Paradigm and our related or associated companies.

Paradigm manages material conflicts of interest in three ways:

• Avoidance: Paradigm avoids conflicts of interest that are prohibited by law, as well as any conflicts that cannot be effectively addressed other than by not engaging in the activity that would give rise to the conflict.

• Control: When, in the firm’s judgment, the conflict of interest can be successfully managed Paradigm will do so by restricting access to information and/or separating business functions. Clients may also be provided with alternative solutions to best manage the conflict.

• Disclosure: Paradigm will always disclose the conflict to clients appropriately. Clients can then independently assess the significance of the conflict in light of the services offered by Paradigm, and determine with Paradigm whether and how to proceed accordingly. Outlined below are the

various services offered by Paradigm, the potential conflicts to consider, and how Paradigm addresses these conflicts.

Paradigm Services and Relationships:

Research:

Potential Conflict of Interest	How Conflicts Will Be Addressed
Paradigm provides investment research on securities of issuer companies that it may recommend to paying customers. These issuers may also have other business relationships with us, including investment banking activity	Our Research is subject to extensive and detailed regulatory requirements and internal standards. This includes the controls over communications between the investment banking department and the research department. Paradigm is also required to disclose within our research reports conflicts that a client should review in assessing whether these conflicts are important. These include: • Compensation received related to both investment banking and non-investment banking services • Ownership by the firm or analyst, • Compensation of analysts, • Rating systems and distributions, including where corporate finance services have been provided • Site visits conducted by research analysts as part of the due diligence for their investment report

Sales & Trade Execution:

Potential Conflict of Interest	How Conflicts Will Be Addressed
Paradigm earns compensation by selling products and services to paying clients	Paradigm will inform clients of fees, commissions and other compensation so clients are aware of what they will be paying in advance of any transaction. Paradigm earns brokerage commissions on trades executed for clients which are negotiated directly between the client and the investment advisor.

	All commissions are disclosed on trade confirmations. Fees for other services is documented in a fee schedule provided to retail clients at the time of account opening, as well as any time there is a change in the fees related to any services. This includes service fees as offered by NBIN, the Carrying Broker for Paradigm. Paradigm is required to make "suitable" investment recommendations, in line with client's investment objectives and risk tolerances, as well as the information available to investment advisors about the recommended investment.
Paradigm may need to select which clients will be offered certain securities if availability is limited in the event of a New Issue being over-subscribed.	The syndication group will make a fair determination of the appropriate allocation of securities based on individual client relationships and other trade-related considerations including suitability, timing, and order size.
Due to investment banking business relationships with issuers of securities, certain employees may know confidential or Material Non-Public Information ("MNPI"). As per the Tipping Provisions of Section 5 of the Securities Act (Ontario), Paradigm cannot disclose such information to clients, even if the information might lead us to not recommend a trade in those securities	Paradigm's investment banking department operates as a separate business unit from both the sales and trading department and the research department. Any information obtained from issuer clients is kept confidential and not divulged to other departments. Paradigm's internal information barriers are designed to ensure compliance with securities regulations to ensure MNPI does not go beyond investment banking and compliance.
Competing market orders might exist, whereby one client wants to buy a security while another client wants to sell it at the same time, which creates a conflict between the clients	Paradigm manages this by routing trades through public marketplaces or utilizing strict internal cross-trading rules that prevent preferential pricing for one client over another
While the majority of trades executed are 'Agency' trades, Paradigm may occasionally act as 'Principal', trading with its own capital or securities against client orders which may result in a profit to the firm	Paradigm will obtain client consent when required and disclose on the client trade confirmation whether the firm acted as Agent or as Principal for each transaction. Notwithstanding the Agent/Principal nature, Paradigm will always seek to achieve Best

	Execution, as is found in Paradigm's Best Execution and Order Handling Document found at www.paradigmcap.com.
Paradigm may sell securities of companies that are related or connected to the firm. This could result in the perception that Paradigm might attempt to enhance the value of the securities of the related company, which might be at odds with the interests of the clients to whom Paradigm might be selling the issue.	Paradigm will disclose an instance of it being a related or connected issuer of the companies which it is involved in selling securities for. This disclosure will be made in advance of the purchase of the new issue so that the client may assess the relationship between Paradigm and the issuer before making an investment decision.

Investment Banking:

Potential Conflict of Interest	How Conflicts Will Be Addressed
Paradigm is paid by issuers of securities when we advise on or underwrite a new issue which we may recommend to clients. In these instances, Paradigm is acting for the issuer that wants to obtain the highest reasonable price to raise funds for the issuer's enterprise, while recommending the investment to purchasers who are interested in obtaining the lowest reasonable price.	Paradigm has structurally segregated the investment banking department from the rest of the advisory business. This prevents the sharing of non-public information. Paradigm's investment banking department appropriately evaluates the reasonableness of pricing new issues and takes into consideration factors such as market conditions, market value, and the specific securities being offered. This evaluation is performed separately from the considerations of the equity sales group. In all instances, investments must be suitable for the client and in line with the client's stated investment objectives and risk tolerance. While institutional customers are suitability exempt, Paradigm reserves the right to not sell certain new issue securities to retail customers if it is determined that the investment is unsuitable. The offering documents provide full disclosure of all relationships Paradigm may have with the issuer, including compensation arrangements related to the transaction

Related or Associated Companies

Potential Conflict of Interest	How Conflicts Will Be Addressed
Merchant Banking Activities: From time to time one or more companies affiliated with Paradigm may undertake merchant banking activities. Individuals involved with Paradigm in various capacities may also be involved in such merchant banking activities. Such merchant banking activity may involve an issuer to which, or about which, Paradigm provides one or more of the above listed Paradigm services. These merchant banking activities may be, or may reasonably be perceived to be, of direct or indirect benefit to Paradigm	These types of potential conflicts are covered in Paradigm's internal policies, and the activities are supervised and monitored internally. Appropriate disclosure will be provided to clients as determined in the context of each conflict of interest.

Other Potential Conflicts of Interest

As well as the potential conflicts of interest we have set out above there are a number of other potentially relevant conflicts that may arise:

Potential Conflict of Interest	How Conflicts Will Be Addressed
Individuals may serve on the board of directors of issuer companies or other organizations	Employees may act as directors or officers of public companies in rare instances. Any employee looking to serve on the board of directors of a public company must first seek the approval of the Paradigm compliance department as well as the Paradigm Board of Directors to ensure all conflicts of interest are accounted for. For employees looking to serve on the board of private companies, compliance pre-approval is required.
Employees may receive or give gifts, gratuities, or entertainment opportunities due to their relationship with clients. If the gift being given or received is material, then there is a chance that it could influence the behaviour of the Paradigm registrant or client, perhaps to the disadvantage of other clients.	Paradigm has strict Policies and Procedures to limit what are acceptable gift and entertainment practices. All gifts above a threshold are reviewed to ensure they are not inappropriately influencing the behaviour of the Paradigm registrant.

Other Outside Activities by employees of the firm	All employees must disclose upon hiring and at least annually, whether they engage in outside activities for which they expect to receive compensation (including indirect payment), consideration or other benefit received or expected. If required, these activities may be added to the National Registration Database (NRD). These activities must be preapproved by the compliance department to mitigate the risk of client confusion and/or conflicts of interest in advance, consider the best interests of the client, and approval will only be granted in cases where effective controls, and qualified supervisory personnel are in place. Employees are prohibited from engaging in outside activities that would interfere or create conflict with their duties.

Fees and Services Charges

Commissions

Commissions are transaction related fees paid to the firm at the time of sale or shortly thereafter and which are shared by the dealer with the advisor. Paradigm charges a minimum of $25 per trade for retail accounts and may negotiate a mutually agreeable fee with the client based on the number of shares purchased and/or the value of each share.

Fees

As part of the account opening process, all retail clients are provided with a Fee Schedule which details the fees Paradigm charges, including costs to:

- Trade
- Hold accounts at the Firm
- Send money via wire transfers
- Transfer accounts out of the firm

As a part of disclosure mandated by Canadian regulators even though it is inconsequential to clients of Paradigm Capital, we remind our retail clients that every dollar paid toward commissions, fees and charges is a dollar no longer available for investment. Over long time horizons, the loss of potential investment growth on those deducted dollars compounds, creating an increasing drag on investment returns. Clients are reminded that excessive transfers in and out of the account including wires, in addition to interest charges due to late payments to the account,



may potentially impact a client's investment returns. Clients are encouraged to review the Fee Schedule provided at account opening to ensure that there are no surprises.

Account Reporting

Transaction and Statement Reporting

The client will receive an electronic confirm by email on the day of the trade, confirming any transactions executed in the account. The client will also receive written trade confirmations sent via mail by our Carrying Broker, NBIN, on the day after the trade is executed (T+1). Client account statements are generated on a monthly basis if there is activity in the account, and at least quarterly if there is no account activity. We do not currently provide clients with the percentage return of their accounts on account statements.

Paradigm does not offer Portfolio Management services.

These client account statements are provided by our carrying broker NBIN and are in accordance with regulatory requirements.

Annual Portfolio Review

We are responsible for sending each client an annual account report for the previous calendar year which will be provided by our carrying broker NBIN. The report will provide information regarding how client's investments performed over the last year and a list of charges and payments paid by the client over the same time period.

If the client chooses to have an annual portfolio review with their advisor, the client can discuss the performance of the account holdings and investment strategy.

Performance Benchmarks

Investment benchmarks are a standard against which the performance of a security, mutual fund or portfolio can be measured. Generally, broad market stock and bond indices are used for this purpose. There are dozens of indices that be used to gauge the performance of any given investment including the S&P/TSX Composite, the S&P 500 and the Dow Jones Industrial Average. When evaluating the performance of investments, it is important for customers to compare returns against a pre-selected and appropriate benchmark.

Given the importance of having the correct comparison and the diverse nature of its client portfolios, Paradigm will not include benchmarks on the monthly client statements.

Trusted Contact Person

The Trusted Contact Person ("TCP") is a resource intended to help the Investment Advisor in charge of managing the client account:

- Protect the interests or financial assets of the client in response to possible financial exploitation.
- Help the Investment Advisor protect the interests or financial assets of the client in response to concerns about their mental capacity.
- Confirm or provide the name and contact information of the client's legal representative, in particular their legal guardian, the Executor/Liquidator of an estate of which they are the beneficiary, or the trustee of a trust of which they are the beneficiary.
- Validate and obtain the client's current contact information in the event the Investment Advisor can no longer reach the client, especially after several attempts.

All Paradigm clients will be asked if they wish to appoint a TCP at the time of account opening. If they choose to appoint one, they will be asked to complete a form authorizing the Investment Advisor to communicate with their elected TCP in the following circumstances:

- If the Investment Advisor becomes concerned about the client's capacity to make financial decisions in their best interest, their capacity to understand information, or measure the foreseeable consequences of a financial decision that the client is about to make or not make
- If the Investment Advisor suspects possible financial exploitation
- If the Investment Advisor is unable to reach the client successfully, after several attempts
- If the Investment Advisor needs to obtain the name and contact information of my legal representative, if necessary

Conditions for Temporary Holds

Paradigm will not place a temporary hold on a client's account on the basis of financial exploitation of a vulnerable client unless Paradigm reasonably believes all of the following:

- The client is a vulnerable client,
- Financial exploitation of the client has occurred, is occurring, has been attempted or will be attempted

Paradigm will also not place a temporary hold on a client's account on the basis of a client's lack of mental capacity unless Paradigm reasonably believes that the client does not have the mental capacity to make decisions involving financial matters.

Should a hold be placed on a client's account due to any of the above reasons, Paradigm will ensure all of the following conditions are met:

- All facts and reasons that caused Paradigm or the Investment Advisor to place, and if applicable, to continue the temporary hold, are documented,
- The notice of the temporary hold and the reasons for the temporary hold are provided to the client as soon as possible after placing the temporary hold,
- The relevant facts are reviewed as soon as possible after placing the temporary hold, and on a reasonably frequent basis, to determine if continuing the hold is appropriate,
- Within 30 days of placing the temporary hold and, until the hold is revoked, within every subsequent 30-day period, one of the following must be done:
    - Revoke the temporary hold,
    - Provide the client with notice of Paradigm's decision to continue the hold and the reasons for that decision

Client Responsibilities

A firm needs the client's help to ensure that the relationship with their advisor is positive and results in the services that the client needs and wants. The client has a responsibility to help achieve this outcome. To this effect, the client should:

- Provide a full and accurate description of their financial situation, investment objectives risk tolerance, risk capacity and time horizon to their advisor to assist him/her in meeting the client's investment goals.
- Promptly inform their advisor of any material changes to their life circumstances or investment objectives. A "material change" is a change to any information that could reasonably result in changes to the types of investments appropriate for a client, such as income level, investment objectives, risk tolerance, time horizon or net worth. Examples of such changes would include changes in employment, marital status or retirement plans.
- Review all account documentation, sales literature, trade confirmations, statements and other documents provided by the advisor or firm.
- Understand all costs and fees associated with the services a client will be provided.
- Be proactive - ask questions and request information to resolve any questions about the account, specific transactions or investments or the client's relationship with their advisor.
- Be cognizant of potential risks and returns on investments.
- Communicate in writing expectations for the advisor and/or firm.
- Contact the Chief Compliance Officer if displeased with answers or explanations from the advisor: compliance@paradigmcap.com
- Ensure payment for transactions is made by the settlement date.
- Review account/portfolio holdings on a regular basis and discuss them with the advisor.
- Consult a professional such as a tax accountant or a lawyer for professional advice.

Complaint Handling Procedures

Written client complaints can be submitted either via email to compliance@paradigmcap.com or via mail to the Designated Complaints Officer ("DCO") of Paradigm.

General Counsel
95 Wellington Street West, Suite 2101
Toronto, Ontario M5J 2N7

The DCO may also be reached by phone at 416 361 9892.

Within five (5) business days of the receipt of a complaint, the client will be sent an acknowledgment letter. In this acknowledgement letter, Paradigm may request additional information in order to investigate the complaint. Paradigm will also send the client the following CIRO brochures:

How To Make a Complaint (Link to brochure) and *How CIRO Protects Investors (Link to brochure)*

The client will also receive these brochures at the time of account opening.

Within ninety (90) calendar days of the receipt of a complaint, Paradigm will provide the client with a substantive response. If Paradigm is unable to respond to the complaint within the above time frame, the client will be provided a written explanation as to why.

In the final decision letter, Paradigm will provide the client with a summary of their complaint, the results of the investigation, an explanation of the final decision, and the other options available for seeking compensation, should the client not be satisfied with the response.

If any client is dissatisfied with Paradigm's final response, they may contact the following organizations: Ombudsman for Banking Services and Investment ("OBSI"), CIRO, or they may choose to go to arbitration or
pursue legal action.

Agreements and Disclosures

The following agreements, some of which may be found at www.paradigmcap.com, may be entered into depending on the type of account(s) the client opens:

- Joint Account Agreement
- Margin Agreement, to be obtained before a margin account is opened
- Consent to electronic delivery of documents
- Trading Authority Agreements

The following disclosures are provided via www.paradigmcap.com to the client by Paradigm:

- Research Rating System
- Research Distribution Policy
- Best Execution and Order Handling
- Privacy Policy and Agreement
- Relationship Disclosure Information
- NBIN Account & Services Agreements & Disclosures
- NI 24-101 Trade Matching Statement
- CIRO Know Your Advisor: Advisor Report

The remaining disclosures below are provided to the client via email at the time of account opening:

- Introducing/Carrying Broker Disclosure Statement
- Paradigm's Fee Schedule
- CIPF Brochure
- OBSI Brochure
- How CIRO Protects Investors Brochure
- CIRO Complaints Brochure
- Paradigm's Business Continuity Plan