

Conflict of Interest Policy

Why this Disclosure Statement is Important to You

In the course of providing services and products to you, there will be situations where a conflict will arise between Clear Street Canada Inc.'s ("**CSC**", "**us**" or "**our**") interests and yours. These conflicts may be actual conflicts of interest, or you may perceive that we have a conflict of interest. Conflicts can give rise to a concern that we or our representatives may act or will act with a view to their own business or personal interest which may result in our or our representative's financial gain. Conflicts can also arise in circumstances where there are differing interests amongst clients, which may lead to a perception that we will be favoring a client or set of clients over other clients.

We seek to avoid or minimize conflicts where reasonably possible. We seek to avoid actual or perceived favoritism or discrimination amongst clients and to ensure that no client receives preferential treatment over another in providing financial products and services to you. Some conflicts cannot be avoided, including those conflicts that are inherent in the business model that we use and our relationship with our affiliates, however, at all times, we address these conflicts by implementing controls that we believe to be effective.

Canadian securities laws require us to take reasonable steps to identify and respond to material conflicts of interest in your best interest and tell you about them. This Conflicts of Interest Disclosure Statement identifies which conflicts of interest we consider are material when we and our representatives provide financial products and services to you. We also describe the potential impact on and risk that the conflict could pose to you and how we address the conflict to minimize its impact and risks to you and our other clients.

In situations that we do not or cannot avoid a conflict of interest, where our interests may compete with yours, we will always strive to give your interests priority to ours, which allows you to be confident that we address conflicts in your best interest. In addition, there may be other situations that pose unique conflict of interest issues, which we will provide you with supplemental disclosure. Unless otherwise specified, we deal with and manage conflicts as follows:

- We avoid conflicts which are prohibited by law as well as conflicts that we cannot effectively control.
- Our representatives are required to comply with various policies and procedures, which are designed to ensure that our representatives follow ethical and client-first business practices. These policies and procedures include CSC's Conflict of Interest policies and procedures. We have a robust oversight process to ensure that these policies and procedures are effective.
- In order to comply with Canadian securities regulations, our internal compensation practices are designed to ensure that our representatives are not incented or influenced to make recommendations to you about specific products or services we offer.
- For each material conflict, we seek to resolve it in your best interest.

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Clear Street Canada Inc., Member FINRA

[Clear Street Canada Regulatory Disclosures](#)

- We disclose information about conflicts of interest we consider material when we and our representatives provide financial products and services to you so that you can assess independently if these conflicts are significant to you.

Material Conflicts of Interest

Below is important information that will help you be fully informed about conflicts of interest we consider are material to you. In general, our interests can conflict with your interests. The fees that you will be charged are based directly on the transactions in your account. You will incur more fees if you actively trade in your account. We therefore have an incentive to encourage you to engage in transactions. Either we or an affiliate also earns revenue by providing locates so that our clients may short sell and earns margin revenue when our clients trade on margin. We therefore have an incentive to encourage short selling and/or use of margin.

Outside Activities

At times, individuals acting on our behalf may participate in activities outside of their employment with the firm, such as serving on a board of directors, participating in community events or pursuing personal outside business interests, whether paid or unpaid. A potential conflict can arise from such an individual engaging in such activities as a result of compensation received, the time commitment required, or the position held by the representative in respect of these outside activities. The potential impact and risk to you are that these outside activities may call into question the representative's ability to carry out their responsibilities to you or properly service you, there may be confusion which entity(ies) the representative is acting for when providing you with services and/or if the outside activity places the representative in a position of power or influence over you. Outside activities which present a high degree of likelihood of conflict or investor confusion are avoided.

Referral Arrangements

We may enter into referral arrangements from time to time, pursuant to which another entity refers clients to us and receives a benefit. These arrangements can create a potential conflict of interest because the other entity may receive a financial or non-financial incentive to make referrals to us. The details of these referral arrangements, if any, including the parties to the referral arrangement, the manner in which the referral fee for referral services is calculated and the party to whom it is paid, will be provided to you in writing.

Gifts and Entertainment

Our executives and representatives are not permitted to accept gifts or entertainment beyond what we consider consistent with reasonable business practice and applicable laws. We set maximum thresholds for such permitted gifts and entertainment so that there cannot be a perception that the gifts or entertainment will influence decision-making.

Complaint Handling

Addressing a complaint by a client can create a potential conflict if we have a choice between addressing the complaint in a manner that is beneficial to us or addressing the complaint in the

best interests of the client. The potential risk to you is that we act in our own business interests. To control this potential conflict, we have adopted policies and procedures for the handling of client complaints. These policies and procedures are described in the Relationship Disclosure Information document under the heading “Complaints”.

Personal Trading

Our policies and procedures and the CSC Code of Conduct require employees to act in accordance with applicable laws that prohibit insider trading, front running, and similar conduct. Employees may be required to obtain prior approval before making trades in their personal trading account. Our employees are prohibited from accessing non-public information for their direct personal benefit.

We May Change this Conflicts Disclosure Statement

The information disclosed in this Conflicts of Interest Disclosure Statement may change from time to time, for example if we later consider we have another material conflict that we have not previously disclosed to you or we change how we address the conflict in your best interest. Any changes to this document will be communicated to you from time to time.