

CLIENT COMPLAINTS

Highgate Group Inc. (“Highgate”) provides a written summary of our complaint handling procedures to new clients at account opening. Securities laws govern the processes by which Highgate Group reviews and responds to client complaints.

Highgate has a regulatory obligation to acknowledge a client complaint within five days of receipt and to review all client complaints in detail. Upon completion of our review, we provide a summary of the complaint, results of our investigation, and an explanation of our decision to the client. Highgate Group will provide a final decision with respect to a complaint within 90 days, or an interim response with an explanation for the delay and the expected new response time.

Highgate’s final response concerning any complaint will include information regarding your options to escalate your complaint, including contact information for CIRO’s free dispute resolution service. For residents of Quebec, you may request that your complaint file be transferred to the “Autorité des Marchés Financiers” following receipt of Highgate Group’s final decision or the expiry of the time limit of 90 days, however, this request must be submitted no later than one year after the date you have obtained our final response.

For further information, please refer to CIRO’s pamphlet “An Investor’s Guide to Making a Complaint”, a copy of which is provided at the time of account opening or contact our Complaints Officer at Highgate Group Inc., 1, Place Ville Marie, Suite 1950, Montreal, Quebec H3B 2C3. Attention: Compliance, Complaints Officer.

A more detailed description of Highgate Group’s complaint handling process is provided below: The following outlines Highgate Group’s policies and procedures for dealing with complaints.

A “complaint” is deemed to include an alleged grievance involving Highgate Group or an employee. Examples of a complaint may include:

- A. Any written statement, including email or fax, of a client, or any person acting on behalf of a client;
- B. Any written or verbal statement from any person alleging: theft, fraud, misappropriation of funds or securities, forgery, money laundering, market manipulation, insider trading, misrepresentation, or unauthorized trading; or
- C. Any other verbal complaint from a client that will warrant the same treatment as a written complaint.

Complaints should be sent/ directed to:

Highgate Group Inc.

1, Place Ville Marie, Suite 1950

Montreal, QC, H3B 2C3

Attention: Designated Complaints Officer

or by telephone at: 514-396-0346

1. If the complaint (written or verbal) is deemed to be “service-related”, the complaint may be handled directly by the applicable Highgate Group supervisor or manager. All securities-related, complaints are handled by the Designated Complaints officer or by qualified Compliance staff.
2. Upon receipt of a verbal statement, if the complaint is deemed to be “regulatory-related” Highgate Group will request that the client or individual (or person lawfully acting on behalf of the client or individual) provide particulars of the complaint to Highgate Group in writing. Highgate Group’s request for a written complaint may be made verbally or in writing.
3. Upon receipt of a written or verbal complaint, Highgate Group’s Compliance Department will immediately record the complaint in the internal compliance complaint log and send the complaint acknowledgment letter within five (5) business days of receipt of the complaint.
4. The Compliance Department will contact the individuals involved in the complaint and, where appropriate and/or possible, request their information and documentation relating to the matter. Where the complaint involves allegations of serious misconduct or is a legal action, Highgate Group’s Compliance Department will ensure that senior management is aware of the complaint.
5. Highgate Group’s Compliance Department will begin its investigation of the allegations raised in the complaint and communicate the findings/results within 90 days of receipt of the written complaint. With respect to the investigation, Highgate Group’s Compliance Department will gather the facts, information and documentation in order to properly analyze and consider the complaint.

6. Once the investigation has been completed, the response letter will be prepared. Depending on the nature of the complaint, the response will be reviewed by the Designated Compliance Officer and/or Highgate Group's legal Counsel if deemed necessary.

"Service-related" complaints are those complaints which are founded on customer service issues and which are not the subject of:

- i. Any legislation or law concerning securities or exchange contracts of any jurisdictions, inside or outside of Canada; or
- ii. By-laws, rules, regulations, rulings or policies of any securities or financial services regulatory or self-regulatory organization in any jurisdiction.

"Regulatory-related" complaints are those complaints concerning:

- i. Any matter related to securities or exchange contracts;
- ii. Any matter related to the handling of client accounts or dealings with clients;
- iii. Any matter that is the subject of any legislation or law concerning securities or exchange contracts of any jurisdiction, inside or outside of Canada; or
- iv. Any matter that is the subject of by-laws, rules, regulations, rulings or policies of any securities or self-regulatory organization in any jurisdiction