

Sales Practices Guide



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Introduction

This Sales Practices Guide is intended to provide advisors with an overview of all regulatory guidelines and internal processes pertaining to the development of compliant marketing communications. Advisors or team members responsible for coordinating marketing and sales communications initiatives should refer to this resource prior to requesting approval or implementing marketing initiatives. The Investia Compliance Policies and Procedures Manual (CPPM) referenced throughout this guide is available on the Advisor Centre, under the Guides & Training / Compliance section. This guide will provide advisors with an overview and understanding of the following:

- Compliance requirements and processes for marketing communications
- Approval processes for sales communications
- Available support resources
- Tips for developing compliant client and public communications



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Sales Communications

Definition

Sales communication is defined as any advertising, sales literature, and correspondence, including a letter or email sent to more than 10 clients.

Common advisor sales communications may include:

- Mass client emails
- Mass client letters (i.e., introduction or transfers...)
- Newsletters
- TV, radio, digital & print advertising
- Advisor websites
- Outside activities-related sales communications
- Marketing material
- Social media
- Broadcast programs
- Publication & media articles
- Business cards & stationery
- Email signatures
- Office signage
- Promotional items
- Brochures, handouts & flyers
- Presentations & seminars
- Mutual fund co-op marketing
- Video (i.e., YouTube), webinars, podcasts

All sales communications require approval from the Sales Communications team prior to distribution.

Approval Process

Advisors are asked to submit their requests by email to sales_communications@investia.ca with a copy of all final drafts of the communication.

It can take up to five business days to receive approval for a sales communications request. For more complex requests such as websites or special projects, approval can take up to ten days. Rush requests will be accommodated on a case-by-case basis.

Best practices

- All communications must align with Investia's corporate brand standards and must be approved by Sales Communications prior to distribution or publication.
- Advisors should always plan ahead and allow for sufficient time for the review of marketing pieces. Deadlines should be indicated when submitting for approval and Sales Communications will try to accommodate this timeline based on the volume of requests at the time of submission.
- Content submitted for approval must be carefully reviewed to ensure it is compliant with the CPPM, as well as regulatory requirements.
- If an advisor is unsure whether the marketing communications initiative requires prior approval, advisors are asked to submit an enquiry to Sales Communications and include all required forms well in advance of the anticipated deadline.
- Sales communications approvals are not permanent. Approvals are granted for one-time use only, unless a longer approval duration is specifically requested:
 - Should any detail of the advertisement change, the content must be resubmitted for approval.
 - Media article requests require a list of the date(s) of publication(s) and the name of the publication in which the content will appear.
- If a marketing communication initiative is cancelled prior to approval, the Sales Communications team must be notified by email so the request can be closed. This is especially important for presentations and media appearances.
- The Sales Communications team is available to assist through the approval process and answer any questions or concerns.
- Failure to obtain written approval for all sales communications activity, in accordance with Investia's procedures, will result in escalation to compliance with possible serious repercussions.

It can take up to five business days to receive approval for a sales communications request.



General Guidelines

Content and imagery used in sales communications must adhere to specific Investia Visual Identity Guidelines, as well as industry regulations. The following checklist should be used to determine if the communication of choice complies with Investia guidelines, applicable policies, legislation, and regulatory guidelines.

Logos and dealer name

The dealer logo must be displayed appropriately, and of equal or larger prominence than the advisor trade name logo. No other logos, other than the advisor's trade name and/or dealer logo are permitted.

Designations and registration

- The advisor's full name, approved title and designation must be included on all communications.
- Only approved titles may be used:
 - Any designations must appear as an abbreviation and cannot be used as an additional title without review and approval.
 - It is the advisor's responsibility to ensure their designations are always in good standing.
- The advisor's address and contact information should be included in the communication, as applicable:
 - Contact information must match contact information on the National Registration Database (NRD) (maintained by the Registration team);
 - Any address changes must be reported to Registration.
- The advisor must be licensed in applicable provinces to provide all products promoted in the communication.
- Dually licensed advisors (mutual funds and insurance) must clearly indicate which company each title is associated with, along with the appropriate disclaimers to differentiate securities-related activities from insurance activities.

Content

- All appropriate disclaimers must appear in at least 10-point font size.
- Please note that no references to registration or licensing status with regulatory bodies are permitted.
- If requesting mutual fund co-op support, the Mutual Fund Co-Op section of the CPPM should be referenced.
- All statements must be true, contain relevant material facts and not include any false or misleading advertising.
- There can be no unjustified promises of specific results.
- All potential risks to clients must be clearly outlined.
- The communication cannot contain information that is detrimental to the company, public or securities industry.
- The content must be of a professional nature, relating to financial services with an image and tone befitting Investia and the industry.
- For communications in Quebec, the language must be consistent with the Charter of the French language.
- All imagery used in the communication must be royalty-free or the appropriate licensing must be obtained or purchased.
- Appropriate approval for all data/ sources used in the communication (e.g., numbers or graphs) must be obtained and source(s) cited:
 - Any statistics, data and charts must be sourced, with the name of the author, company, title, and date on which it was published.
- If taken from a website, the site name, title of article and URL should be provided. Permission must be obtained for any reproductions used based on the creator's usage policies. Advisors should refer to the content creator's website, publication disclaimers and usage guidelines for further information.
- All quotes must be properly researched and sourced.
- If discussing mutual fund performance data, the indicated rates of return are not to be more than 45 days old and must include standard performance data for 1-, 3-, 5- and 10-year rates of return and since inception.
 - Mutual funds that have less than one year of performance data cannot be promoted.
- Written permission for a specific application must be obtained prior to use of client testimonial. Clients' initials, as well as the date of testimonials, must be identified next to the testimonial. A copy of client consent must be submitted for head office's records.
- Letters must be communicated on approved letterhead.
- The sender's email signature must be included in email communications. It must meet Investia's email signature requirements (see applicable section). All email signatures must be submitted for approval prior to submission of client emails for approval.

Trade Names

Advisors may wish to include a trade name and logo in marketing communications materials. The following guidelines should be referenced when including a trade name or logo on materials:

- The trade name must be approved for mutual funds and recorded in the NRD.
- The advisor's mutual fund trade name/logo must be identified and appear in equal prominence to the dealer's name and logo.
- The trade name must always be used in combination with the full legal name of the Dealer Member in public documents (e.g., stationery, websites, email signatures and print and online advertising).

To register a trade name, advisors must complete the [Trade Name Approval Request Form](#) and submit it to Sales Communications.

Disclaimers

Including appropriate disclaimers allows for quick approvals and avoids major changes by Sales Communications. Depending on the communication's content and the advisor's current licensing, one or more disclaimers may be required, which would be amended during compliance review. Please refer the Appendix A for the complete list of disclaimers.



Canada's Anti-Spam Legislation (CASL)

Canada's Anti-Spam Legislation (CASL) came into effect on July 1, 2014, to regulate certain forms of electronic communications that take place during a commercial activity.

What qualifies as a commercial electronic message (CEM)?

CEMs include email, text, audio, voice, or image messages that encourage participation in a commercial activity regardless of whether there is an expectation of profit or not.



Examples of what qualifies as a CEM:

- Invitation to an event, seminar, or presentation
- Sending a newsletter by email
- Sending a letter to prospects by email
- Any email that promotes a product or service
- An email with a comparative evaluation of two products (e.g., TFSA vs RRSP)
- A text, email or any electronic communication sent via a social media platform

Examples of what does not qualify as a CEM:

- Confirmation of a transaction carried out in a client's account
- Account statements
- Duplicate tax receipts
- Account administration forms (e.g., dividend instructions, power of attorney, transfer authorization)
- Requests for cheque, EFT, and RIF withdrawals
- Message confirming the date and time of a meeting to update the client's file
- Message to a client asking how to process the minimum withdrawal from his/her RRIF
- Electronic greeting card (e.g., birthday, get well, holiday).

Sending a CEM

The CRTC requires that all CEMs must be compliant with CASL rules to avoid potential complaints and any penalty that could include a significant fine.



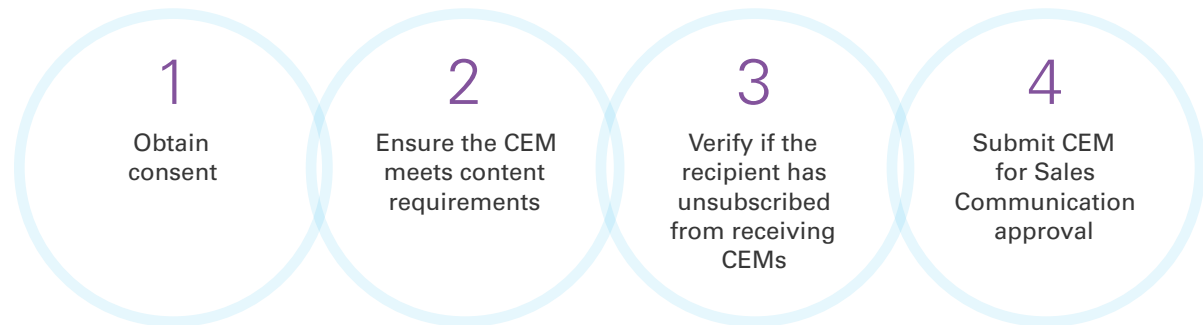
Additional information

[Canada's Anti-Spam Legislation \(Official CRTC website\)](#)

[Canada's Law on Spam and other Electronic Threats \(Information for businesses and individuals\)](#)

[Glossary](#)

To be compliant with CASL, there are four steps to complete before sending a CEM:



Step 1: Obtain consent:

Advisors must have implied or express consent from the client or prospect before sending the CEM.

Consult the [FAQ](#) on CASL, located on the Advisor Centre.

Step 2: Ensure the CEM meets content requirements

A CEM must respect all the following conditions:

- The subject and message cannot provide false or misleading information.
- The sender's identification and contact information must be included (name, postal address, telephone number and email address) and the contact details must remain valid for 60 days following the sending of the CEM.
- An unsubscribe mechanism is present (please make sure your email signature template has been approved by the Sales Communications team).

Step 3: Verify if the recipient has unsubscribed from receiving CEMs

Advisors are responsible for maintaining their own mailing lists. Additionally, they must verify if a recipient or anyone on their mailing list has unsubscribed from receiving CEMs. This can be verified using the verification tool available on the Advisor Centre: [Anti-Spam Law – Status](#).

Step 4: Submit CEM for Sales Communication approval

Some CEMs require Sales Communications approval as per Chapter 3 of the CPPM. If applicable, the CEM can be distributed to verified recipients once it is approved.

Media Appearances

A media appearance is defined as appearing on a TV program, radio or video broadcast show or participating in a podcast. Please adhere to the following guidelines for media appearances:

- All scripts, outlines or content referenced must be approved prior to broadcast or publication.
- No recommendation is to be communicated via the program or broadcast/podcast without first being approved by the Compliance department.
- If the participating advisor wishes to invite another Investia advisor to participate in the broadcast, separate sales communication approval is required for the invited advisor.
- When appearing on a broadcast not produced by the advisor, correct titles, trade names and dealer name must be used.
- If advisors opt to create their own radio or TV program, correct titles, trade names, dealer name and additional disclaimers will need to be included for broadcast and are dependent on content and broadcast frequency.
- After a media appearance, a link of the full recording must be submitted for post review and approval before it can be distributed.
- All materials must be sent to compliance for review and archival within 24 to 48 hours of the publishing date, regardless of intent of use.



Speaking Engagements

Engaging in public speaking activities require prior approval from Sales Communications and copies of the following must be submitted:

- Invitation
- Advertisements
- All presentations/handouts

In the case of a media interview regarding the advisor's business, a script or outline must be submitted to Sales Communications and approved in advance. If possible, advisors should include a list of questions and proposed answers. For audit purposes, Sales Communications is required to conduct a post-review of the interview content. A final copy or link to the interview must be submitted within 24 to 48 hours of the interview for approval.

For speaking engagements, if a recording is available, it must be submitted for approval as well. The interview/ speaking engagement must be approved in post-review before the recorded interview is distributed, including on social media and advisor websites.

Advisors are not permitted to speak to the media on behalf of Investia, or any subsidiary of iA Financial Group of Companies, concerning corporate or business information. Corporate information involves the disclosure of the business operations and financial performance.

Written authorization should also be obtained for quotes or comments attributed to the author in any communications used.

Titles & Designations

Professional Titles

All titles must adhere to company and regulatory standards as set out in the Investia Compliance Policies and Procedures Manual, regulatory requirements, as well as industry-wide norms. No title outside those that have been approved for use can be used.

Titles are subject to review and may need to be updated as regulations change. Any required changes will be communicated clearly to advisors and licensed assistants.

The following examples represent approved titles for each category. Titles not appearing on this list must be submitted for approval, along with a description of the requestor's duties and qualifications. Requests for titles that are not listed below will be considered on a case-by-case basis.

Titles derived from designations (e.g., Chartered Investment Manager professional, etc.) are not permitted as a title. These designations can be expressed in biographies, descriptions and other materials but must appear in their abbreviated form (e.g., CIM® etc.) after a name and before an approved title on items like stationery, email signatures, etc.

Permitted titles

Title	Description
Financial Advisor	Acceptable in Ontario only with a credential in good standing with an approved credentialing body as determined by the Financial Services Regulatory Authority of Ontario ("FSRA"). There are no restrictions in any other provinces on the use of Financial Advisor as a business title with the exception of Quebec where Financial Advisor is not an accepted title.
Financial Planner/ Certified Financial Planner	Certified Financial Planner title is not accepted in Quebec. Advisors must satisfy financial planning designation requirements in Quebec to be able to use "Financial Planner" or "Fin. Pl." Acceptable ONLY if the individual has met the minimum proficiency standards by: <ul style="list-style-type: none"> — Successfully completing the required course(s); — Being licensed by the appropriate governing body, and if applicable: — Continuing to remain in good standing with their association(s). — Acceptable in Ontario only with a credential in good standing with an approved credentialing body as determined by the Financial Services Regulatory Authority of Ontario ("FSRA").
Professional Designations / Business Titles such as: CFP, CPA, LLB, MBA, etc.	Note: Designations must be indicated as an abbreviation and not in full, except for the CFP designation. Designations are not a substitute for a business title.
Investment Funds Advisor	
Investment Funds Representative	
Investment Funds Salesperson	
Mutual Funds Representative (or Mutual Fund Representative)	
Representative	

Note: Licensed Assistants with Investia must use "Licensed Assistant" business title. The use of the adjective "Senior" is subject to approval by the management team.

Professional Titles

Non permitted titles

Title	Description
Broker	"Broker" is a recognized category of registration used by members of the IIROC.
Consultant	Consultant is considered surrogate for "advisors" and is not acceptable unless the Representative holds that designation.
Independent Executive or Independent Representative	An individual may not use "independent" as it implies disassociation from the dealer who is responsible for their actions.
Investment Advisor	An Investment Advisor must be employed by a broker or investment dealer, and be a full securities salesperson specifically registered for that purpose.
Investment Counsellor	This is separate registration category with the various securities commissions.
President, Vice-President, Controller, Secretary, Officer, Director, Portfolio Advisor, Portfolio Manager, Private Manager, Account Manager or Sales Executive	These titles imply an executive position with the Dealership and may only be used by a member of Head Office staff designated with the title unless specifically attached to the Representatives business/trade name.
Securities Advisor or Securities Representative	<ul style="list-style-type: none"> — May only be used by a full securities salesperson. — "Securities salesperson" and "securities advisor" are specific categories of registration. — This title implies the ability to deal in all securities.
Wealth Manager	This is a category of registration not held by Investia Representatives.

Note: Adding adjectives to professional titles should be based only on objective notions. "Expert", "Specialist" or "Emeritus" are not accepted

Professional Designations

An individual who wishes to display their designations or degrees/diplomas beside their name in their abbreviated forms (e.g., B.A., B.Comm. CFP®, CIM®, etc.), must provide evidence of the applicable certificate or diplomas, if not already documented on NRD.

The CERTIFIED FINANCIAL PLANNER® professional or CFP® designation can be used in all provinces except in Quebec, provided the designation remains valid for the individual (e.g., the individual has met the continuing education requirements and paid renewal fees, as required). It is the responsibility of the holder to ensure their designations are always in good standing.

In Quebec, the only recognized financial planning designation, which is awarded by the Institut Québécois de la planification financière (IQPF), is the Financial Planner (F.PI.) designation. The individual must also be registered for financial planning with the AMF. Therefore, the CERTIFIED FINANCIAL PLANNER® professional or CFP® designation is not permitted to be used or advertised by advisors registered in Quebec.

For more information and confirmation of designations recognized at Investia, please contact the Sales Communications team.



Stationery & Signage

Stationery

Visually appealing stationery plays a central role in establishing and maintaining a positive, professional image for your business. It is also the principal means of presenting the Investia brand, as well as your individual trade name identity, in a clear and consistent manner.

Investia stationery follows a standard format that has been developed for use by all advisors and can be ordered through the Advisor Centre.

The following diagrams are sample illustrations only and subject to change.

Advisors licensed only in mutual funds



This version also exists in a bilingual format.

FRONT



BACK

Advisors with mutual fund trade name only

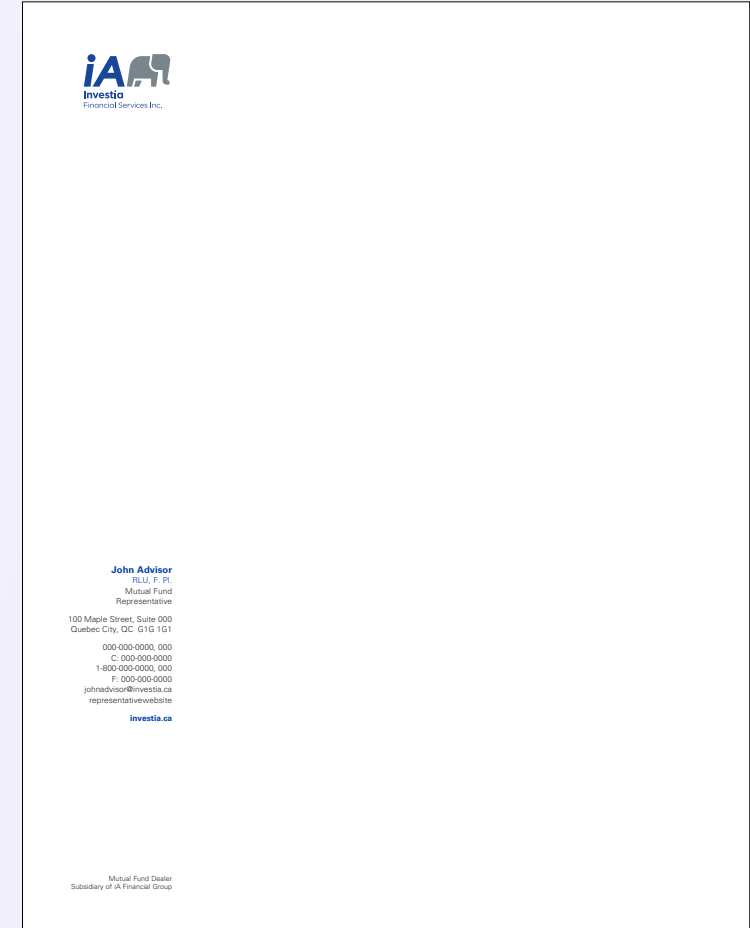


FRONT



BACK

Investia branded items (letterheads / envelopes)



UNILINGUAL

Email Signatures

Please make a note of requirements for email signatures as per the following:

- Name and designations
- Approved business title
- Address and contact information
- Advisor's trade name (if applicable)/logo (to be identified in equal prominence to Investia logo/name)
- Investia dealer name/logo
- Product verbiage (mutual funds, exempt market products and exchange traded funds are offered through Investia Financial Services Inc.)
- Investia unsubscribe verbiage: To unsubscribe from receiving commercial electronic messages from Investia Financial Services Inc., click [here](#).
- If applicable, outside activity unsubscribe mechanism: To unsubscribe from receiving commercial electronic messages from [entity for outside activity], please reply to this email with "Unsubscribe" in the Subject line.

For QC-related enquiries concerning AMF requirements, please contact Investia's Sales Communications team.

Signage

One of the fundamental ways to establish your local footprint is through signage. In many cases, office signage is a consumer's first exposure to a brand, and it can have a major impact – positive or negative – on their perception of that brand.

Signage should be considered an important part of your marketing strategy, as it plays an integral role in the placement and promotion of your business. It is one of the principal means of presenting both the Investia brand and your individual trade name identity, and should therefore be clear, consistent, and professionally rendered.

Please refer to Appendix C for illustrations providing basic visual guidelines for the use of the Investia identity on signage. While general design standards have been established to promote alignment with the brand and consistency across all signage, the information below does not consider every possible size and type of sign; rather, it serves as a guideline and will require some interpretation based on specific applications.

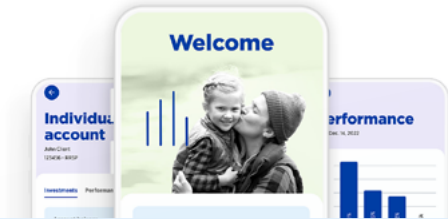


Websites and Social Media

Advisor Websites

Advisors may choose to use a website to increase their visibility online by communicating about the products and services they offer through Investia. Investia's monitoring tool, SQWatcher, helps ensuring advisor websites remain compliant and up to date at all times. The following requirements apply for all websites:

- The domain address (URL) must be submitted for pre-approval and added to the advisor's Registrations profile.
- New websites should be submitted with a preview (inactive) URL and all content must be approved before the website is published.
- The dealer logo must be at least of equal size to any other logo that appears.
- Only hyperlinks to pre-approved social media profiles are permitted.
- Displays of performance data sourced/linked from third-party websites are admissible only if the following criteria are met:
 - The data must originate from a recognized and credible source.
 - The data must be updated automatically and not require manual updating.
 - Performance data must be referenced to include date and source (refer to the previous section).
 - Reproduction approval must be obtained from the data source and confirmation of their reproduction, link, and sourcing policies before posting.
- All content and imagery must follow general content guidelines listed in this guide.
- Website disclaimer must appear at the bottom of each website page/footer.
- Link to a disclaimer page on your website should be positioned at the bottom of every page in the footer. This page should reference:
 - Mutual funds (full version, see Appendix A);
 - GICs (see Appendix A);
 - Life insurance / segregated funds (see Appendix A).
- A live link to iA's Privacy Policy webpage (<https://ia.ca/privacy-policy>) must be added to website footer/every page.
- Branches can mention life insurance when there are members in their team who are properly licensed and registered to offer life insurance services.
- Insurance licensing needs to be reviewed.
- All insurance-related information should be kept on a separate page or tab of the advisor's website and must be clearly differentiated.
- Website changes and updates must be preapproved by the Sales Communications team prior to being published.



Mobile website version

Advisors who choose to create a mobile version (accessible via smartphone) of their website must submit a draft of the mobile website content for review and approval by Sales Communications.

Investia personalized web pages

Investia offers a free personalized web page creation service on investia.ca. For more information, click on "Personalized Web Pages," which is found under the "Useful Links" section in the Investia Advisor Centre.

Your page will include:

- A simple address (e.g., investia.ca/firstname.lastname)
- Your picture
- Your contact information
- Your introductory text

You will also get a storefront on investia.ca and enjoy the many benefits:

- Your name and contact information referenced on pages presenting our services
- The possibility of adding your web address to your business cards
- A tablet and mobile-friendly web interface
- Higher search engine ranking thanks to the traffic to investia.ca
- Compliant, up-to-date content at all times
- Bilingual page

Social Media

Advisors are permitted to use Facebook, Instagram, LinkedIn and Twitter. Through these platforms, advisors can engage in social media activities as part of their overall marketing strategy. Please note that the use of TikTok is not permitted.

Depending on the nature and content of a social media communication, pre-approval by Sales Communications is required before it can be shared.

To comply with regulatory requirements, Investia uses SunGard to monitor and archive social media activities. Any advisor or assistant using social media for business purposes is encouraged to register their social media profile(s) in [SunGard](#). Monitoring is done in a professional, discrete, and private manner.

Personal versus professional profiles

Advisors are encouraged to maintain separate personal and business social media profiles. A personal social media profile should be submitted for review and record keeping and should not be used for business activities at any capacity.



Creating a SunGard account

- Advisors should contact the Sales communications team at sales_communications@investia.ca to create a SunGard account and will be guided through the set-up and registration process of their social media accounts.
- The [SunGard User Guide](#) should be referenced for additional information on SunGard.

The Sales Communications social media approval process

The Sales Communications team is available to ensure advisor social media profiles comply with regulatory requirements. Advisors are reminded that although social media platforms are widespread marketing tools, it is important to proceed with caution – everything posted or shared on social media is public and permanent. As such, all content must be of a professional nature, ideally relating to financial services, with an image and tone befitting Investia and the industry. Every social media page, communication / post must be submitted to Sales Communications for review and approval. The same rule applies to any subsequent updates.

Once a SunGard account is created and social media profile(s) are registered, there is no need to submit each profile to Sales Communications for approval – this is done directly in SunGard.

Recommendations/commentary that deal with a specific investment or company, whether delivered through social media or other forms of communication, are in the eyes of the regulators subject to suitability requirements. As a result, advisors must not make recommendations via social media when directed at a specific investment, company or issuer, or the sharing of third-party recommendations.



Facebook

Requirements:

- Must be set up as a company or business page
- Must include the following disclaimer in the profile or the “About” page (should be easily legible and visible): *Mutual funds, exempt market products and exchange traded funds are offered through Investia Financial Services Inc.*
- Display the advisor’s full name and approved business title
- Display the dealer name/logo
- The advisor’s trade name/logo may be used, provided the dealer name/logo is also indicated.
- A profile description, bio, experience, and services must be reviewed and approved by the Sales Communications team.



Instagram

Requirements:

- Must be set up as a public profile
- Must include the following disclaimer: *Mutual funds, exempt market products and exchange traded funds are offered through Investia Financial Services Inc.*
- Display the advisor’s full name and approved business title
- Display the dealer name/logo
- The advisor’s trade name/logo may be used, provided the dealer name/logo is also indicated.
- A profile description, bio, experience, and services must be reviewed and approved by the Sales communications team.
- Live stories and IGTV features are not permitted.



LinkedIn

Requirements:

- Display the advisor’s full name and approved business title
- Display the dealer name/logo
- The advisor’s trade name/logo may be used, provided the dealer name/logo is also indicated.
- A profile description, bio, experience, and services must be reviewed and approved by the Sales Communications team.
- The headline must indicate the advisor’s approved title and the dealer’s name.
- Must include the following disclaimer: *Mutual funds, exempt market products and exchange traded funds are offered through Investia Financial Services Inc.*
- An outside activity may appear on the advisor profile. It must be disclosed and approved before adding it to the LinkedIn profile, must be a separate entry in the “Experience” section and be clearly separated if mentioned in the “About” section.



Twitter

Requirements:

- Display the advisor’s full name and approved business title
- Display the dealer’s name (due to restrictions to space limitations, please indicate @iainvestia)
- The advisor’s trade name/logo may be used, provided the dealer name/logo is also indicated.
- Must include the following disclaimer: *Mutual funds, exempt market products and exchange traded funds are offered through Investia Financial Services Inc.*
- A profile description, bio, experience, and services must be reviewed and approved by the Sales communications team.



Videos

Prior to making a video, advisors must submit a script to Sales Communications for approval. Advisors should consider the script as an outline or a template and follow these steps:

- Outline everything that will be said in the video including the topics and information that will be addressed. Submitting a script or outline prevents having to make costly changes to the final video.
- Depending on the content of the video, additional disclaimers may be required.
- Upon approval by the Sales communications team and at the time of publication, disable all comments on videos.



Mutual Fund Co-Operative Marketing Guidelines

Mutual fund co-operative (co-op) marketing refers to the process whereby third-party mutual fund companies agree to pay a maximum of 50% of the advisor's total cost on the condition that certain rules and regulations are followed.

NI 81-105 Mutual Fund Sales Practices outlines the acceptable marketing practices relating to mutual fund co-op:

5.1 Cooperative marketing practices

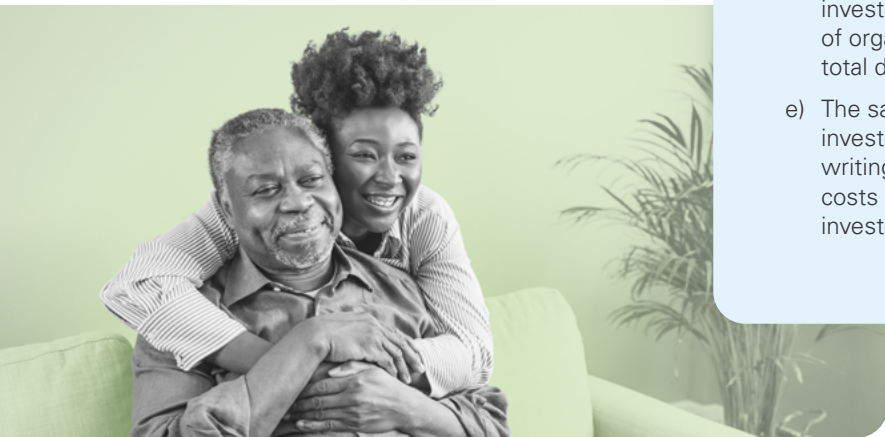
A member of the organization of a mutual fund may pay, to a participating dealer, direct costs incurred by the participating dealer relating to a sales communication, investor conference or investor seminar prepared or presented by the participating dealer, if:

- a) The primary purpose of the sales communication, investor conference or investor seminar is to promote, or provide educational information concerning the mutual fund, or the mutual fund family of which the mutual fund is a member or mutual funds generally.
- b) In the case of an investor conference or investor seminar, the conference or seminar is presented by the participating dealer to investors or potential investors of the mutual fund, another mutual fund in the same mutual fund family, or of mutual funds generally.
- c) The participating dealer provides invoices for, or receipts evidencing payment of, the direct costs to be paid by a member of the organization of the mutual fund.
- d) The aggregate direct costs of the sales communication, investor conference or investor seminar paid by all members of organizations of mutual funds do not exceed 50% of the total direct costs incurred by the participating dealer.
- e) The sales communication discloses, or persons attending the investor conference or investor seminar are informed of in writing, the identity of all parties paying for a portion of the costs of the sales communication, investor conference or investor seminar.

The dealer and mutual fund company are both responsible for ensuring that the sales communication satisfies NI 81-105 and has passed the primary purpose test, which is primarily the promotion or education of mutual funds and contains a minimum of two-thirds mutual fund content.

Initiatives that do not qualify for mutual fund co-op include client appreciation events and initiatives that discuss topics such as "tax and estate planning"; funds not sold under a prospectus, and insufficient material to educate or promote mutual funds. If, however, the mutual fund company received an exemption from the OSC for seminars on "tax and estate planning," a copy of the exemption is required to approve the mutual fund co-op request.

The initiative must be approved by the fund company's compliance department before distribution. The wholesaler's agreement to participate does not represent their compliance approval. Additionally, if the advisor has proceeded without Sales Communication and fund company approval, the advisor will risk being solely responsible for all costs.



Mutual fund co-op pre-approval

If seeking mutual fund co-op approval, advisors must submit their request to sales_communications@investia.ca with the following:

- A Mutual Fund Co-op Pre-Approval Form from the mutual fund company.
- A copy of the marketing piece (ad/invite/presentation/agenda) that includes the words “paid in part by” or “sponsored in part by” with the mutual fund company’s name and Investia standard disclaimer (Mutual funds, exempt market products and exchange traded funds are offered through Investia Financial Services Inc.).
- A cost estimate (budget) including printing and postage.
- An agenda for a conference, event, or seminar, which includes a breakdown of time spent on a topic, opening remarks, Q & A, etc.
- A copy of the presentations for a conference, event or seminar which would include the mutual fund company’s, as well as the advisor’s if they also plan on presenting.

Please note, all third-party presentations, including those of the mutual fund company, must be pre-approved and include the third-party presentation disclaimer at the beginning of the presentation.

Sales Communications will provide preapproval to the advisor who will need to proceed with the mutual fund company.



Mutual fund co-op reimbursement

When seeking reimbursement for pre-approved mutual fund co-op requests, advisors must submit:

- A Mutual Fund Co-op Reimbursement Form from the mutual fund company.
- A copy of the approved/signed Mutual Fund Co-op Pre-Approval Form.

- Receipts and invoices:

Note that fees incurred for any advertising, communication, conference, or seminar jointly carried out with mutual fund companies cannot be refunded from the mutual fund company for a sum greater than 50% of the total costs disbursed.

Sales Communications will co-ordinate the reimbursement request with the mutual fund company. The cheque must be paid to the dealer and once received by the Sales Communications team, it should be sent to accounting for processing.

Educational
co-op support

Educational co-op support refers to a mutual fund company agreeing to pay up to a maximum of 100% of the advisor's total cost of a financial industry course. When seeking educational co-op approval, advisors must submit:

- A Co-op Pre-Approval Form from the mutual fund company
- Proof of course enrollment
- A course description.

Once the course is completed, advisors must submit:

- A Co-op Reimbursement Form from the mutual fund company
- Receipts/invoices
- Proof of a passing evaluation
- A copy of the approved/signed Mutual Fund Co-op Pre-Approval Form

Donations to registered
charity organizations

Charitable donation refers to a mutual fund company agreeing to pay a fixed-dollar amount directly to a specific registered charity. When seeking charitable donation preapproval, advisors must submit:

- A Charitable donation Approval Form from the mutual fund company
- The charity's registration number
- A description or mission of the charity
- The charity's contact, address, email, and www/telephone number.

For additional information on donation to registered charity organizations, please refer to Chapter 12 of the CPPM.

Sponsorships

Any request will be reviewed on a case-by-case basis, please forward your request to the Sales Communications team for review and approval.



Contests

The following information provides detailed guidelines on the regulatory procedures and best practices to follow when it comes to developing and launching contests.

- The form must be completed for all contests, regardless of prize value.
- The form should be added to each reference or communication related to the contest that includes the following:
 - “No purchase required” must always be indicated in the short form
 - Number of prizes to be won
 - Approximate value of prizes
 - Any regional allocation of prizes
 - Skill-testing question requirements
 - Conditions of participation (or where to obtain if long rules apply)
 - The contest close date
 - Date and time of the draw
 - Details as to the chances of winning (a chart may simplify explanation of the chances)
 - Any other facts known to the advertiser that materially affect the chances of winning.

The following rules apply to all Canadian provinces. Note that there are additional rules on the holding of promotional contests that apply specifically to Quebec.

Contests in Quebec

The advisor organizing the contest is responsible for the procedure with the Régie des alcools, des courses et des jeux.

What qualifies as a contest?

According to Article 1B) of the Act, respecting lotteries, publicity contests and amusement machines, a publicity contest is “a contest, a lottery scheme, a game, a plan or an operation which results in the awarding of a prize, carried on the object of promoting the commercial interests of the person whom it is carried on.”

Also, the contest needs to meet the following criteria to be valid:

- “No purchase necessary” – participation in the contest must have been made possible without the participant having to purchase the product or service in question.
- The value of the prizes, the number of prizes, the regions where the contest is available as well as any information that can affect the chances of gain and the winning probabilities must be disclosed.
- Prize distribution should not be unduly delayed.
- The choice of participants or the distribution of prizes must be made according to the address of the participants or at random.
- The advertisement must comply with the competition rules and must not cause confusion.

Types of contests requiring to be registered with the Régie

Prize value	Registration ¹ required to the Régie and delay	Contest rules	Contest rules provided to the Régie	Fees ²
≤ \$100	No	No	No	None
> \$100 to ≤ \$1,000	Yes, 5 business days	Yes	No	Yes
> \$1,000 to ≤ \$2,000	Yes, 5 business days	Yes	No	Yes
> \$2,000	Yes, 30 business days AND the ad for the contest needs to be submitted 10 business days prior to distribution	Yes	Yes, 10 business days prior to the beginning of the contest	Yes

¹ The form Publicity Contest Notice is available here: <https://www.racj.gouv.qc.ca/en/forms-and-publications/forms/publicity-contests/publicity-contest-notice.html>

² Fees need to be paid by cheque to the Régie.

10% of the total value of the prizes for Quebec residents exclusively.

3% of the total value of the prizes for Canadian residents exclusively, if one of the winner is a Quebec resident.

0.5% of the total value of the prizes if one of the winner is a Quebec resident.

Contest advertising rules

Under section 6 of the Rules respecting publicity contests, any publicity contest (\$100 or more) must have an advertisement that does not imply that a person:

- Won a given prize
- May participate in a contest for the purpose of receiving a prize or being able to win a prize, when in fact all participants receive a prize.
- The advertisement must state:
 - The number and description of the prizes offered as well as their respective value
 - How and where the public can obtain the text of the contest rules
 - The nature of the event to which the winner must submit to obtain their prize, when participation in a publicity contest requires the purchase of goods or services
 - “No purchase necessary”
 - Restrictions on eligibility
 - Where the implementing regulations are available
- “Properly and fairly”:
 - The number and approximate value of the prizes
 - Regional price distribution (regions, stores, etc.)
 - Any fact known to the advertiser significantly modifying the chances of winning.

Contest rules

The contest rules are the document containing all of the terms and conditions relating to the eligibility and the conduct of the contest. The regulations are a contract of adhesion. Beware of illegible and external clauses as well as ambiguities. The contest rules must be accessible and public. The regulations must absolutely comply with certain clauses provided in the various applicable laws, e.g., when the system used for the attribution of the prizes does not make it possible to know the name of the winners, the entry form or the advertisement must mention the place in Quebec and the period when it is possible to find out the winning numbers or get the list.

The rules must include the following:

- Conditions of participation in the contest
- Places where the public must deposit or send the contest entry forms
- Date and time limit for entering the contest
- Description of the method of awarding prizes
- Number of and detailed description of the prizes offered and the value of each
- Precise place, date and time of the designation of the prize winner
- Mention of the media used to notify the winners of the prize won
- Place, date and time by which the prizes must be claimed or, as the case may be, the fact that the prizes are shipped to the winners
- Mention that, in all cases, the following individuals must be excluded from the contest: the person who is benefitting from the contest being held, their employees, their representative, their agent or a member of the jury, as well as the people with whom they are domiciled
- Mention of the following text: “A dispute regarding the organization and conduct of a publicity contest may be submitted to the Régie des alcools, des courses et des jeux for a ruling. A dispute over the awarding of a prize may be submitted to the Régie only for the purpose of helping the parties reach a settlement.”
- Nature of the test to which a winner must undergo to obtain his prize
- When participation requires the purchase of a good or service, provide the ancillary way of participating without real purchase (e.g., text of 200 or 250 words on a particular subject)
- When the system used for the attribution of the prizes does not make it possible to know the name of the winners, the entry form or the advertisement must mention the place in Quebec and the period when it is possible to find out the winning numbers or obtain the list
- When the competition is the exclusive fruit of chance, a skill-testing question must be included (mathematical skill-testing question, general knowledge question, etc.)
- Denounce any known fact that significantly modifies the chances of winning, such as the odds of winning
- The distribution of prizes must not be unduly delayed
- The choice of participants must be based on the address of the participants
- Consent for the collection, use, storage and communication of information received in connection with the administration of the contest.



Facebook contests

Requirements:

- The contest must be posted on the advisor's professional Facebook page.
- The advisor can ask his or her subscribers to click on "Like" or to comment on a post to enter the contest but not to like the page or to share the post.
- The total value of all the prizes offered in the context of the contest should ideally be of a value of less than \$100, because for prizes of \$100 and more, it is necessary to comply with the rules of Régie, including several additional legal requirements, and in certain cases, a license.
- The advisor must mention in the post when the draw will be made.
- The advisor must exclude Facebook from the contest by writing in the post "Facebook is in no way related to this contest".

Facebook contest best practices

- Advisors may wish to include images that represent the prize(s) being given away.
- It is recommended to give participants at least a few days to participate (e.g., the contest is posted on Thursday and advisor draws for the prize on Sunday).
- To determine the winner, advisors must manually draw from the names of those who entered the contest.
- Advisors may contact the winner(s) by private message in addition to announcing it in the comments.

Appendix A

Disclaimers

Standard disclaimers

- **Where the dealer logo is present with no discussion of products/services:** *Mutual funds, exempt market products and exchange traded funds are offered through Investia Financial Services Inc.*
- **Where products/services are discussed, without views/opinions (e.g., ads, handouts, brochures):** *Mutual funds, exempt market products and exchange traded funds are offered through Investia Financial Services Inc. ("Investia"). Mutual funds, exempt market and exchange traded funds products are sold exclusively by Representatives who are licensed by provincial regulators and registered with Investia. Commissions, trailing commissions, management fees and other expenses may be associated with mutual fund, exempt market product and exchange traded fund investments. Please read the Fund Fact sheet or prospectus carefully before investing. Mutual fund, exempt market product investments and exchange traded funds are not guaranteed, their values change frequently, and their past performance may not be repeated.*

Magazine or newspaper article

The comments contained herein are a general discussion of certain issues intended as general information only and should not be relied upon as tax or legal advice. Please obtain independent professional advice, in the context of your particular circumstances. This article was written by [Advisor's name], for the benefit of [Advisor's name], Mutual Fund Representative with [Trade name, if applicable], a registered trade name with Investia Financial Services Inc., and does not necessarily reflect the opinion of Investia Financial Services Inc. The information contained in this article comes from sources we believe reliable, but we cannot guarantee its accuracy or reliability. The opinions expressed are based on an analysis and interpretation dating from the date of publication and are subject to change without notice. Furthermore, they do not constitute an offer or solicitation to buy or sell any securities.

Mutual Funds are offered through Investia Financial Services Inc. Commissions, trailing commissions, management fees and expenses all may be associated with mutual fund investments. Please read the prospectus before investing. Mutual funds are not guaranteed, their values change frequently, and past performance may not be repeated.

Newsletter

The comments contained herein are a general discussion of certain issues intended as general information only and should not be relied upon as tax or legal advice. Please obtain independent professional advice, in the context of your particular circumstances. This newsletter was written, designed, and produced by [Advisor's name], for the benefit of [Advisor's name], Mutual Fund Representative with [Trade name, if applicable], a registered trade name with Investia Financial Services Inc., and does not necessarily reflect the opinion of Investia Financial Services Inc. The information contained in this newsletter comes from sources we believe reliable, but we cannot guarantee its accuracy or reliability. The opinions expressed are based on an analysis and interpretation dating from the date of publication and are subject to change without notice. Furthermore, they do not constitute an offer or solicitation to buy or sell any securities.

Mutual Funds are offered through Investia Financial Services Inc. Commissions, trailing commissions, management fees and expenses all may be associated with mutual fund investments. Please read the Fund Fact sheet or prospectus before investing. Mutual funds are not guaranteed, their values change frequently, and past performance may not be repeated.



Presentation

(should there be a need for other disclaimers, they will be identified and commented on at the time of review)

The comments contained herein are a general discussion of certain issues intended as general information only and should not be relied upon as tax or legal advice. Please obtain independent professional advice, in the context of your particular circumstances. This presentation was prepared, by [Advisor's name], for the benefit of [Advisor's name], Mutual Fund Representative with [Trade name, if applicable], a registered trade name with Investia Financial Services Inc., and does not necessarily reflect the opinion of Investia Financial Services Inc. The information contained in this presentation comes from sources we believe reliable, but we cannot guarantee its accuracy or reliability. The opinions expressed are based on an analysis and interpretation dating from the date of publication and are subject to change without notice. Furthermore, they do not constitute an offer or solicitation to buy or sell any securities.

Mutual Funds are offered through Investia Financial Services Inc. Commissions, trailing commissions, management fees and expenses all may be associated with mutual fund investments. Please read the Fund Fact sheet or prospectus before investing. Mutual funds are not guaranteed, their values change frequently, and past performance may not be repeated.

Radio and TV ad

(should there be a need for other disclaimers, will be identified and commented on at the time of review)

Mutual funds, exempt market products and exchange traded funds are offered through Investia Financial Services Inc.

Websites

Mutual funds, exempt market products and exchange traded funds are offered through Investia Financial Services Inc. The particulars contained herein were obtained from sources which we believe reliable but are not guaranteed by us and may be incomplete. The opinions expressed on this website have not been approved by and are not those of Investia Financial Services Inc. This website is not deemed to be used as a solicitation in a jurisdiction where this Investia representative is not registered.

GICs

Guaranteed Investment Certificates (GICs) are offered through Investia Financial Services Inc. and/or multiple carriers.

Insurance

Advisors who are also licensed to provide insurance products and services should use the title of Insurance Advisor (except in Quebec*).

— If MGA is not PPI

*Insurance products are provided through [Name of your MGA]. **OR** Insurance products are provided through multiple carriers.*

Segregated fund products are offered through [name of your MGA] and/or multiple carriers. Subject to any applicable death benefit guarantee, any part of the premium or other amount that is allocated to a segregated fund, is invested at the risk of the policy owner and may increase or decrease in value according to the fluctuations in the market value of the assets of the segregated fund.

— If MGA is PPI

Advisors who do not have a corporation for insurance or trade name and who are independent insurance representatives should use the following disclaimer:

Insurance products are provided PPI Management Inc., a national licensed insurance marketing organization that supports independent advisors with their business, and through multiple insurance companies. PPI Management Inc. is an independent and separate company from Investia Financial Services Inc.

Advisors who have a Life Licensed Corporation or trade name for insurance should use the following disclaimer:

Insurance products and services are offered through (Life licensed Corporation/Trade Name). Segregated fund products are offered through [Life licensed Corporation/Trade Name] and/or multiple carriers. Subject to any applicable death benefit guarantee, any part of the premium or other amount that is allocated to a segregated fund, is invested at the risk of the policy owner and may increase or decrease in value according to the fluctuations in the market value of the assets of the segregated fund.

If you have questions about insurance disclaimers, please contact Sales Communications.

* For QC-related enquiries, please contact Investia's Sales Communications team.

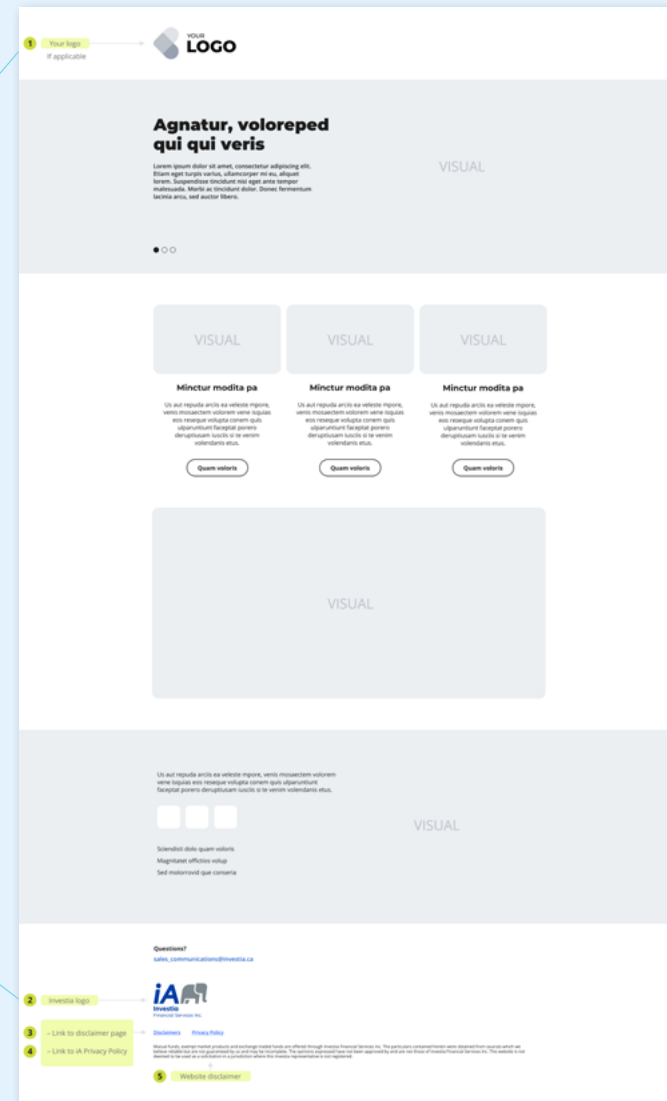
Appendix B Website Template and Email Signatures

Website template

This template is for information purposes only.

Please note that only items 1 to 5 must be strictly adhered to.

The text used in this template is only intended to facilitate visual understanding.



Email signatures

Below are several examples of email signatures. Note that these are examples only.

#1 - Quebec

First name Last name, Designations
Investia approved business title
Name of the firm (insurance of persons, group insurance of persons, financial planning, etc.)*
Business title related to Outside Activity
1 000 Main Street West, Suite 1234
City (Province) Zip code
T. 000-000-0000 | 1-888-000-0000
F. 000-000-0000 | 1-888-000-0000
john.advisor@myfirm.ca

Mutual funds are offered through Investia Financial Services Inc.
To unsubscribe from receiving commercial electronic messages from Investia Financial Services Inc., click [here](#).
To unsubscribe from receiving commercial electronic messages from [Name of the firm], please reply to this email with "UNSUBSCRIBE" in the subject line.

*If you don't have a firm and are an independent representative, please indicate instead: "Independent Representative, [Your business title]"

#2 - With trade name

First name Last name, Designations
Investia approved business title
Business title related to Outside Activity
1 000 Main Street West, Suite 1234
City (Province) Zip code
T. 000-000-0000 | 1-888-000-0000, ext. 1234
F. 000-000-0000 | 1-888-000-0000
john.advisor@myfirm.ca

Mutual funds are offered through Investia Financial Services Inc.
Product verbiage for outside activity (check with the sales communications team for proper wording)
To unsubscribe from receiving commercial electronic messages from Investia Financial Services Inc., click [here](#).
To unsubscribe from receiving commercial electronic messages from [Name of the firm], please reply to this email with "UNSUBSCRIBE" in the subject line.

#3 - Without trade name

First name Last name, Designations
Investia approved business title
Business title related to Outside Activity
1 000 Main Street West, Suite 1234
City (Province) Zip code
T. 000-000-0000 | 1-888-000-0000, ext. 1234
F. 000-000-0000 | 1-888-000-0000
john.advisor@myfirm.ca

Mutual funds are offered through Investia Financial Services Inc.
Product verbiage for outside activity (check with the sales communications team for proper wording)
To unsubscribe from receiving commercial electronic messages from Investia Financial Services Inc., click [here](#).
To unsubscribe from receiving commercial electronic messages from [Name of the firm], please reply to this email with "UNSUBSCRIBE" in the subject line.

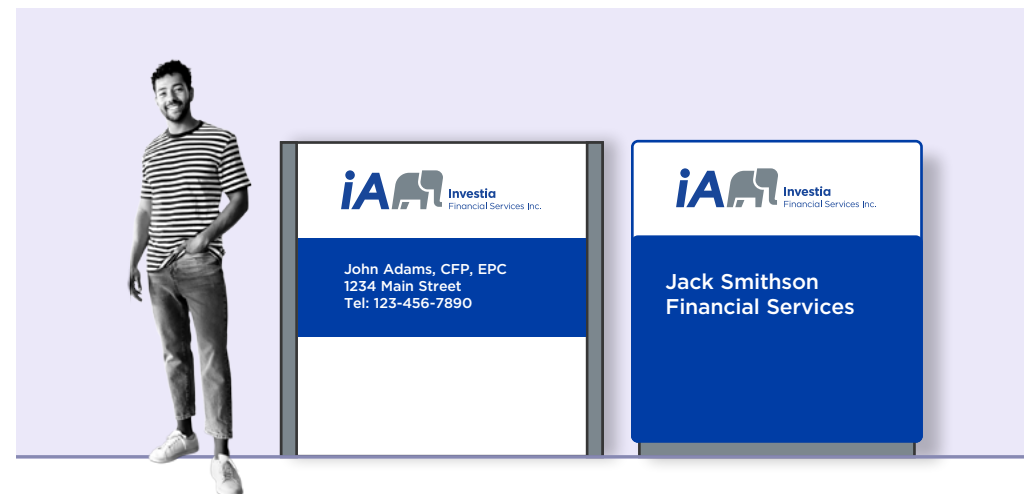
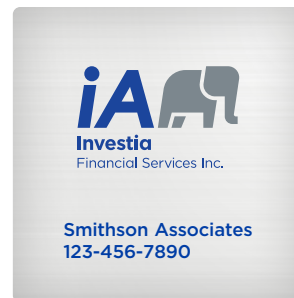
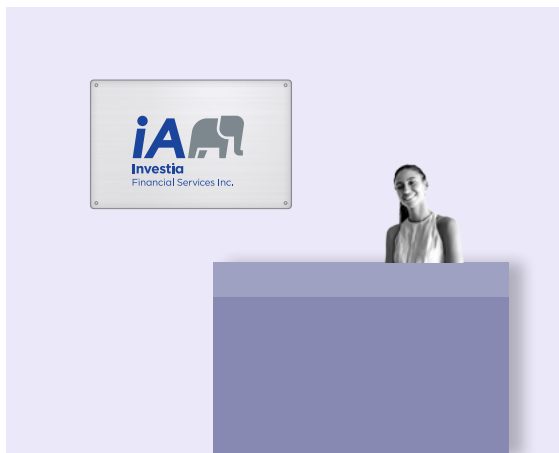
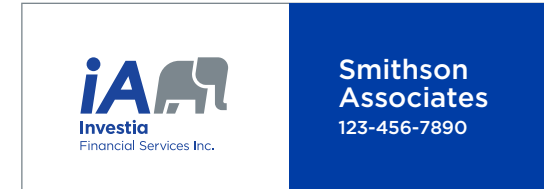
Appendix C

Signage Examples

Signage with advisor information

Below are several examples of how to apply our sign system guidelines to signage. Note that these are examples only.

Whenever possible, the primary color logo should be used for all signage. The advisor may choose to use a logo associated with their personal corporation or trade name next to the Investia logo. If this approach is chosen, the personal or trade logo must appear in equal size and prominence.

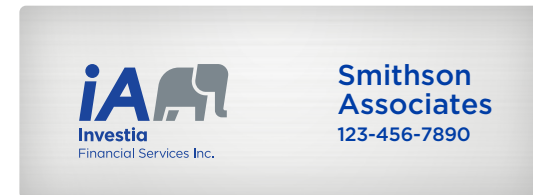


Interior wall, window & door signage

The primary color logo should be used for all interior wall, window, and door signs.

The advisor may choose to use a logo associated with their personal corporation or trade name next to the Investia logo. If this approach is chosen, the personal or trade logo must appear in equal size and prominence.

Note that these are examples only.



Exterior signage

This page features a number of examples of how to apply our sign system guidelines to exterior signage. The system can be applied to pylon, tenant, and fascia signage.

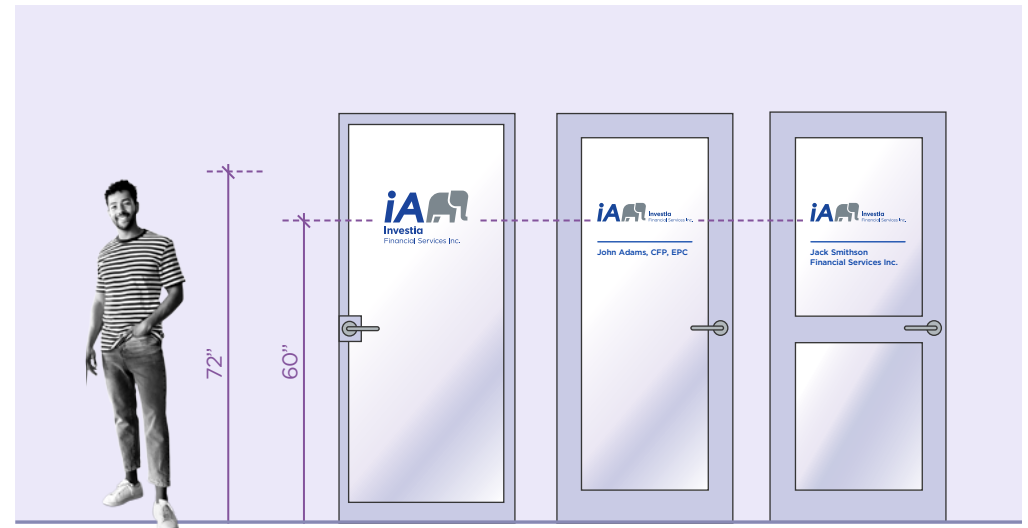
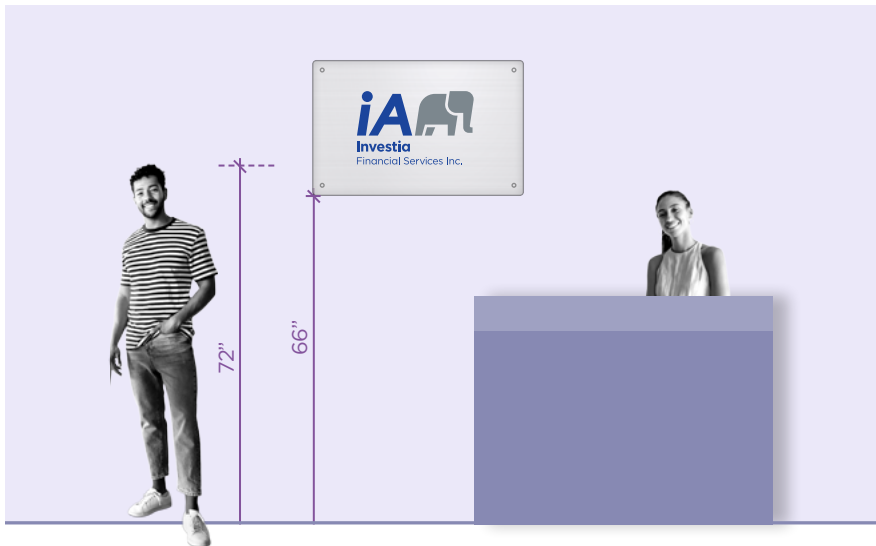
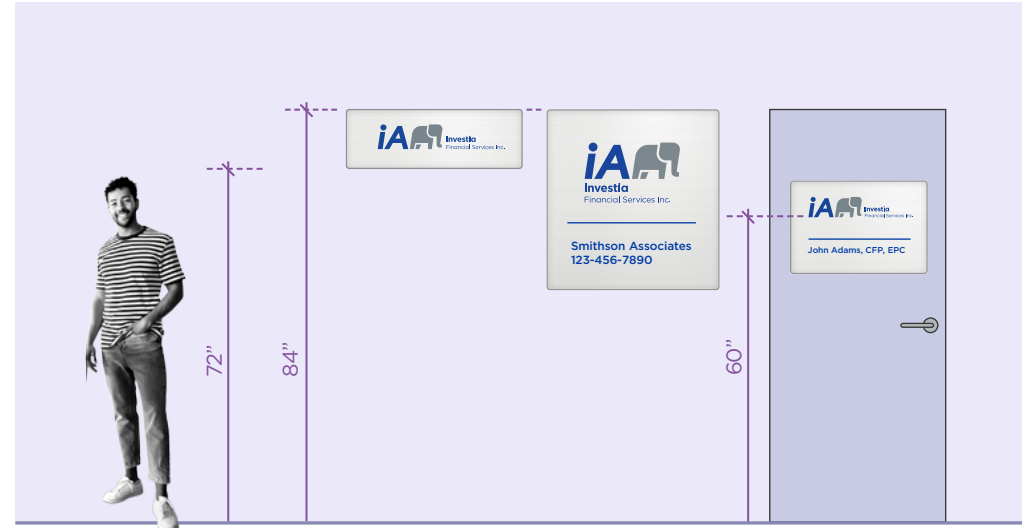
Note that these are examples only.

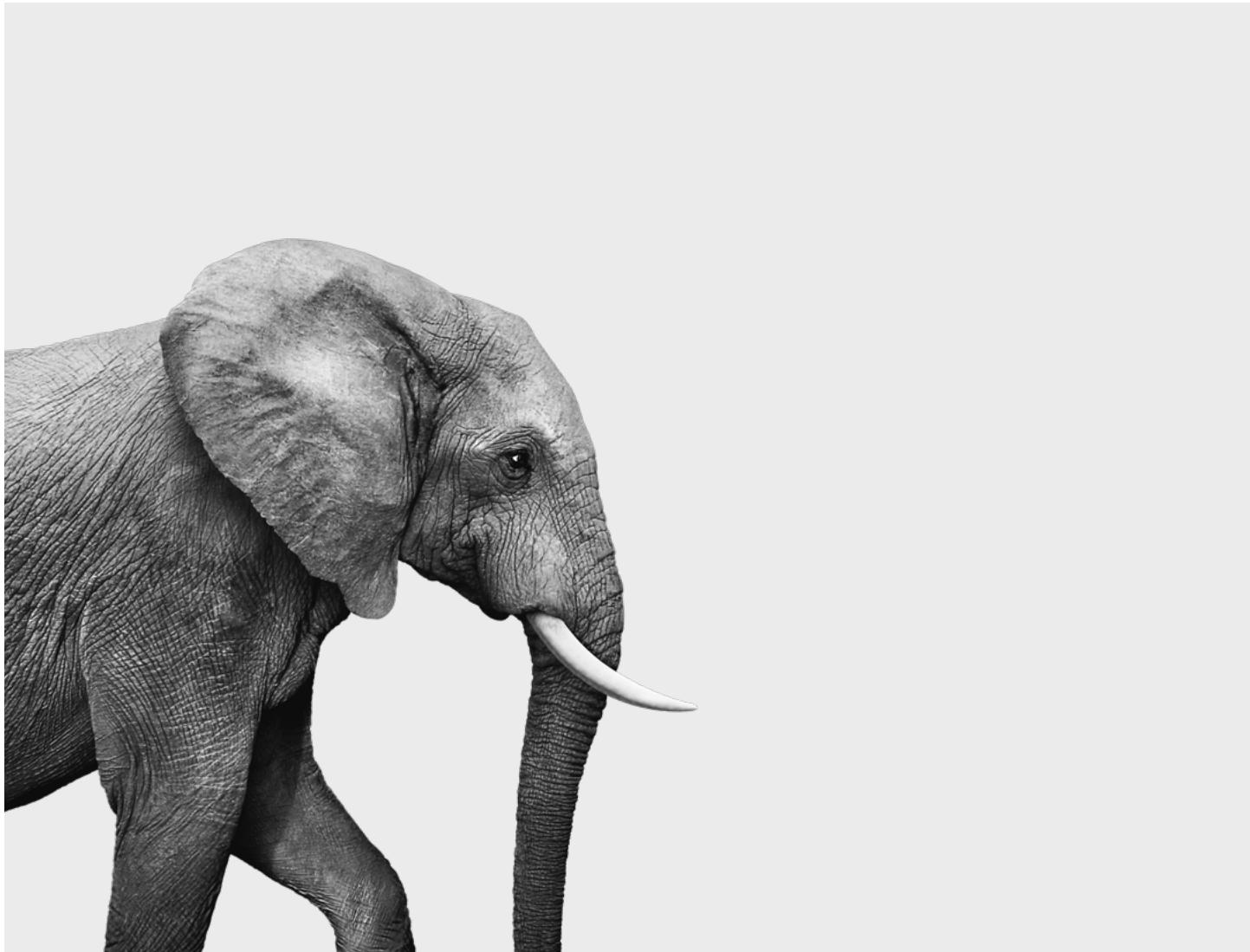


Interior / reception signage

Below are several examples of how to apply our sign system guidelines to interior signage. The system can be applied to wall and door signs and window decals.

Note that these are examples only.





F13-1221A ACC

INVESTED IN YOU.

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investia.ca