



NORTHERN TRUST CANADA

I. Policy & Procedure Summary

A. Statement of Purpose

The procedure sets forth The Northern Trust Company, Canada, The Northern Trust Company, Canada Branch & NT Global Advisors, Inc.'s (collectively "Northern Trust Canada" or "NTC Canada") procedure for handling client complaints.

The procedure recognizes the principles that the Financial Consumer Agency of Canada (FCAC) has set out in "Commissioner's Guidance-12 Internal Dispute Resolution".

B. Authority

Pursuant to the combined operation of Section 13.16, Paragraph 14.2(2)(j) of *National Instrument 31-103 Registration Requirements, Exemptions and Ongoing Registrant Obligations*, Section 441 of the *Trust and Loan Companies Act (Canada)*, Section 573 of the *Bank Act (Canada)*, and Regulation respecting complaint processing and dispute resolution in the financial sector in Quebec, Northern Trust Canada is required to provide its respective clients in writing the information on the applicable firm's independent dispute resolution process or complaints handling process.

C. Scope and Applicability

This procedure is applicable to all Northern Trust Canada employees and clients.



D. Governing Body with Oversight

The Chief Risk and Compliance Officer (CRCO) is responsible for maintaining and periodically updating the procedure. The Board of Directors for The Northern Trust Company, Canada and NT Global Advisors, Inc. are responsible for reviewing and approving any updates to the procedure. The NTC Canada Management Committee is responsible for reviewing and approving any updates to the procedure in connection with The Northern Trust Company, Canada Branch.

E. Regulatory

The CRCO is responsible for filing the procedure with the FCAC in accordance with the requirements of the *Trust and Loan Companies Act (Canada)* and the *Bank Act (Canada)* and for making the prescribed information available to the public pursuant to the *Complaints (Banks, Authorized Foreign Banks and External Complaints Bodies) Regulations to the Bank Act (Canada)*.

The CRCO is also responsible for educating NTC Canada employees of the complaint handling processes available to clients to find resolution to their complaints.

F. Related Policies

NA

G. Effective Date

February 26, 2026

II. Policy & Procedure Details

Please refer to the procedure below.

Name of the Policy	Complaints Handling Policy & Procedure
Scope	Local Policy
Applicability	This procedure is applicable to all Northern Trust Canada employees and clients
Approved by entity and approved dates	The Northern Trust Company, Canada Board – February 2026



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COMPLAINTS HANDLING PROCEDURE for

THE NORTHERN TRUST, COMPANY, CANADA, THE NORTHERN TRUST COMPANY, CANADA BRANCH, and NT GLOBAL ADVISORS, INC.

February 26, 2026

The Northern Trust Company, Canada, The Northern Trust Company, Canada Branch and NT Global Advisors, Inc. (collectively “Northern Trust Canada”, each a “Northern Trust Canada Entity”) have each appointed the Chief Risk & Compliance Officer (CRCO) of The Northern Trust Company, Canada, and NT Global Advisors, Inc. to be responsible for receiving and dealing with, or designating one or more officers or employees of Northern Trust Canada to receive and deal with, any complaints received from clients which have not been resolved by a client service representative, a client account manager or client relationship manager. Clients of Northern Trust Canada shall receive disclosure documents indicating that complaints about their accounts, and in particular concerns over any fees or charges, should first be raised with their Senior Client Investment Officer. If the Senior Client Investment Officer is unable to satisfactorily address the client’s concerns, the complaint will be escalated to the CRCO. An address and telephone number at which the CRCO may be reached is provided within the disclosure document. This disclosure document is attached hereto as an Appendix.

Any complaints received by the CRCO will be reported, as applicable based on the entity the complaint relates to, to the President & CEO of The Northern Trust Company, Canada or NT Global Advisors, Inc., or to the Principal Officer of The Northern Trust Company, Canada Branch. The CRCO will provide an acknowledgment within fourteen (14) days of receipt of the complaint. The final written response from the CRCO which contains a description of the complaint, the results of the internal investigation, the rationale for the final position and the rights for further escalation will be provided to the complainants no later than fifty six (56) days after receiving the initial complaint. Clients will be entitled to receive updates on the status of the complaints upon reasonable request and will be given a reasonable amount of time to respond to any offers made by Northern Trust Canada. If the complaint is not resolved to the client’s satisfaction by the applicable Northern Trust Canada Entity, the client will be advised that they may, within six months, forward their complaint in writing to the Ombudsman for Banking Services and Investments (OBSI). Clients domiciled in Québec will be advised that if the applicable Northern Trust Canada Entity is unable to satisfactorily resolve their complaint, they may have Northern Trust Canada or their legal representative forward a copy of their complaint file to the Autorité des marchés financiers (AMF).

Should the complaint deal with an applicable legislated consumer provision, the CRCO will formally advise The Financial Consumer Agency of Canada (FCAC) of the complaint.

The CRCO will also inform all officers and employees annually of the complaints handling process in place at Northern Trust Canada.

NTC Canada Contact:

Clyde Roach
Chief Risk & Compliance Officer & Senior Vice President
The Northern Trust Company, Canada
The Northern Trust Company, Canada Branch
NT Global Advisors, Inc.
145 King Street West, Suite 1910
Toronto, ON M5H 1J8
Telephone: +1 416-804-7053
Fax: (416) 365-9484
Email: CDR3@ntrs.com

FCAC: The Financial Consumer Agency of Canada (FCAC)
427 Laurier Avenue West, 6th Floor
Ottawa, ON K1R 1B9
Telephone: 1(866) 461-3222 (for services in English)
1(866) 461-2232 (for services in French)
www.fcac-acfc.gc.ca.

OBSI : Ombudsman for Banking Services and Investments (OBSI)
20 Queen Street West, Suite 2400
P.O. Box 8 Toronto, Ontario M5H 3R3
Telephone: 1 (888) 451-4519
www.obsi.ca

AMF: Autorité des marchés financiers (AMF)
800, square Victoria, 22e étage
C.P. 246, tour de la Bourse
Montréal, QC H4Z 1G3
Telephone: (514) 395-0337
www.lautorite.qc.ca



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Appendix – Client Disclosure Document

COMPLAINTS HANDLING PROCEDURE

**THE NORTHERN TRUST COMPANY, CANADA,
THE NORTHERN TRUST COMPANY, CANADA BRANCH, and
NT GLOBAL ADVISORS, INC.
(Collectively “Northern Trust Canada”)**

Although Northern Trust Canada is committed to a positive and rewarding client experience, we understand that at times you may encounter an issue which you need to bring to our attention. To address any complaints you may have, we have a process in place to assist you in resolving your concerns in a professional, open, and efficient manner. If you have a concern that you would like to bring to our attention, please follow the steps below.

Step 1.

Speak with your Senior Client Investment Officer about your concern or complaint, especially if your concern is about fees or service. If your Senior Client Investment Officer is unable to resolve your issue, we encourage you to contact the Northern Trust Canada CRCO.

Step 2.

The CRCO is responsible for receiving, dealing with, or designating one or more officers or employees of Northern Trust Canada to receive and deal with, any complaints you may have that have not been resolved by your Senior Client Investment Officer. The CRCO will provide an acknowledgment within fourteen (14) days of receipt of your complaint, conduct a review of your concerns, and respond to you in writing with his/her findings within fifty six (56) days of receiving your complaint. You will be entitled to receive updates on the status of your complaint upon reasonable request and will be given a reasonable amount of time to respond to any offers made by Northern Trust Canada. The final written response from the CRCO will contain a description of your complaint, the results of the internal investigation, the rationale for the final position and the rights for further escalation. With respect to further escalation, if you believe your concerns have not been addressed to your satisfaction after receiving Northern Trust Canada’s written response, you may have your complaint escalated to an external dispute resolution service (see below).

Step 3.

Canada’s financial institution and securities regulators have several dispute resolution services to assist you in finding a resolution to your complaint. Which one you contact about your concerns depends on where you live, or your business is located, in Canada. If you live in, or your business that receives services from a Northern Trust Canada Entity is located in, Québec, you may have Northern Trust Canada or your legal representative forward a copy of your complaint file to the Autorité des marchés financiers (AMF), the regulatory body responsible for administering the regulatory framework and providing review and mediation



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services in Québec. If you live outside of Québec, or your business that receives services from a Northern Trust Canada Entity is located outside of Québec, you may forward your complaint in writing to the Ombudsman for Banking Services and Investments (OBSI). OBSI is not a regulator but an independent dispute resolution service committed to resolving financial institution and investment disputes. Either organization, as applicable, will review your concerns and Northern Trust Canada's response, and will provide you with a written review of their findings. If you choose to engage either the AMF or OBSI, please contact them within six months of receiving Northern Trust Canada's written response.

Additional Resources

The Financial Consumer Agency of Canada (FCAC) supervises all federally regulated financial institutions to ensure they comply with federal consumer protection provisions. These provisions cover a variety of operating practices that directly affect clients, including providing clients with information about their rights and responsibilities when dealing with a financial entity and monitoring financial entities' compliance with their codes of conduct and public commitments. If you feel your concerns are a matter of federal consumer protection, you may contact FCAC in writing.

Northern Trust CRCO:

Clyde Roach, Senior Vice President
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145 King Street West, Suite 1910
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OBSI : Ombudsman for Banking Services and Investments (OBSI)
20 Queen Street West, Suite 2400
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Telephone: (514) 395-0337
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FCAC:

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427 Laurier Avenue West, 6th Floor
Ottawa, ON K1R 1B9
Telephone: 1(866) 461-3222 (for services in English)
1(866) 461-2232 (for services in French)
www.fcac-acfc.gc.ca.