

COMPLAINTS HANDLING PROCEDURE for
THE NORTHERN TRUST, COMPANY, CANADA;
THE NORTHERN TRUST COMPANY, CANADA BRANCH and
NT GLOBAL ADVISORS, INC.

May 18, 2018

The company appointed Ombudsman is responsible for receiving and dealing with, or designating one or more officers or employees of The Northern Trust Company, Canada, The Northern Trust Company, Canada Branch and/or NT Global Advisors, Inc. (collectively “Northern Trust Canada”) to receive and deal with, any complaints received from clients which have not been resolved by a client service representative, be them 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 Ombudsman. An address and telephone number at which the Ombudsman may be reached is provided within the disclosure document. This disclosure document is attached hereto as an Appendix.

Any complaints received by the Ombudsman will be reported 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, as applicable. The Ombudsman will provide an initial timely acknowledgment of receipt of the complaint and then more formally respond to the client within ninety (90) days of receiving the complaint. Clients will be entitled to receive updates on the status of the complaints upon reasonable request. The final written response of the Ombudsman will contain a description of the complaint, the results of the internal investigation, the rationale for the final position and the rights for further escalation. If the complaint is not resolved to the client’s satisfaction by Northern Trust Canada, 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 Quebec will be advised that if Northern Trust Canada 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 Ombudsman will formally advise The Financial Consumer Agency of Canada (FCAC) of the complaint.

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

NTC

Canada Contact: Clyde Roach (Ombudsman)
Chief Risk and Compliance Officer &
Senior Vice President
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The Northern Trust Company, Canada Branch
NT Global Advisors, Inc.
145 King Street West, Suite 1910
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Telephone: (416) 775-2223
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)
401 Bay Street, Suite 1505
P.O. Box 5
Toronto, ON M5H 2Y4
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

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. Your Senior Client Investment Officer will address your concern and try to resolve it to your satisfaction. If your Senior Client Investment Officer is unable to resolve your issue, we encourage you to contact the Northern Trust Canada Ombudsman.

Step 2.

Northern Trust Canada has appointed an Ombudsman who is 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 you may have that have not been resolved by your Senior Client Investment Officer. The Ombudsman will provide an initial timely acknowledgment of receipt of your complaint, conduct a review of your concerns, and respond to you in writing with his/her findings within ninety (90) days of receiving your complaint. You will be entitled to receive updates on the status of your complaint upon reasonable request. The final written response of the Ombudsman 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 in Canada. If you live in Quebec, 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 services in Quebec. If you live outside of Quebec, 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 organisation, 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

Ombudsman: Clyde Roach (Ombudsman)
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