

## **SECURITIES VOTING PROCEDURES**

### **I. SECURITIES VOTING PROCEDURES**

#### **1. Client-Directed Voting**

If an individual or institutional client grants QIFM voting rights for securities held in their account, then QIFM must obtain a Client Directed Voting form to outline the client's voting preferences.

#### **2. Sub-Advisor Voting**

A written record of delegation of securities voting rights to a sub-advisor will be captured in the Investment Committee meeting minutes and filed in QIFM's records. QIFM will also obtain a copy of the sub-advisor's securities voting policies and procedures.

#### **3. Securities Voting (Procedures)**

If the Advising Representative of a Fund Account is required to exercise voting rights for a given security, then:

- (a) The Advising Representative, or delegate, should receive the Proxy Voting Form.
- (b) The Proxy Voting Form(s) is/are reviewed, and if decided/required, voted on by the Advising Representative, or delegate, in accordance with the Securities Voting Policy (Policy 27).
- (c) In the event that a voting item will be voted on in contravention of Policy 27 – Securities Voting, there must be:
  - i. A review of the voting item by the Advising Representative, or delegate;
  - ii. Rationale for the vote provided to the CCO, or delegate, by the Advising Representative, or delegate;
  - iii. Approval by the CCO, or delegate;

- iv. All related correspondence and approval(s) will be attached to the Proxy Voting Record and filed in the Proxy Voting folder on SharePoint; and
  - v. These voting items will be brought to the attention of the Investment Committee on a monthly basis.
- (d) The following information (if applicable) should be recorded on the Proxy Voting Record which is saved on Sharepoint. The spreadsheet should include the following information:
- i. Name of Issuer;
  - ii. Exchange Ticker;
  - iii. CUSIP;
  - iv. Record Date;
  - v. Meeting Date;
  - vi. Matter(s) voted on (include a brief summary of the items);
  - vii. The party that proposed the matter;
  - viii. The relevant Fund Account;
  - ix. QIFM vote (For, Against or Abstain);
  - x. QIFM vote date; and
  - xi. QIFM vote justification (include a brief summary of the items).
- (e) The Proxy Voting Record should be e-mailed to the Investment Committee before each monthly meeting.
- (f) The Proxy Voting Record should be posted on QIFM's website for the year ending 30 June of a given year, prior to 31 August of that year.