

SECURITIES VOTING PROCEDURES

I. SECURITIES VOTING PROCEDURES

i. 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.

ii. Sub-Advisor Voting

The Investment Committee records each sub-advisor's securities voting activities and this is captured in the Investment Committee meeting minutes and filed in QIFM's records. QIFM may obtain a copy of the sub-advisor's securities voting policies and procedures.

iii. 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 relevant Fund Account;
 - viii. QIFM vote (For, Against or Abstain);
 - ix. QIFM vote date; and
 - x. 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 from July 1 of the previous year to June 30 of the current year and be posted on QIFM's website prior to August 31 of the current year.