



How We Manage Conflicts of Interest

Securities legislation in Canada requires OmniVita Custom Wealth Management Inc. (“OmniVita”, “We”, “Us, “Our”) to make certain disclosures regarding conflicts of interest. This document is to inform you of the nature and extent of conflicts of interest that can arise between OmniVita and our clients.

OmniVita acts as an introducing broker, to directly serve both retail and institutional clients. Your investments are held by National Bank Independent Network, our carrying broker, which executes, settles and reports all account activity and provides a contractual indemnity assuring that client statements are true and accurate.

OmniVita assumes a responsibility to deal fairly, honestly, and in good faith with our clients, and to act in their best interests. By providing you with information about potential conflicts of interest, you can independently assess their significance when evaluating our recommendations.

OmniVita takes reasonable steps to identify all existing and potential conflicts of interest and determine the level of risk for each conflict. We take appropriate steps to control and manage existing conflicts of interest and avoid circumstances that could result in a serious conflict of interest that is considered too high risk.

OmniVita avoids conflicts that are prohibited by law, as well as conflicts that we cannot effectively control. In situations where OmniVita cannot avoid, or where our interests may compete with our clients’, we will always give priority to our clients’ best interests.

OmniVita’s conflict of interest management procedures include:

1. We have established and actively maintain policies and procedures to reasonably identify, manage and avoid conflicts of interest.
2. We address material conflicts in the best interest of our clients and always place clients’ interests first.
3. When applicable, we control information through the use and management of “Grey”/ “Restricted” lists and monitor employee trading accordingly. We require advisors and employees to maintain the confidentiality of all sensitive information and prohibit them from using such information for their personal gain.
4. OmniVita has personal trading policies and procedures to monitor personal trades of employees, officers and directors who have access to information about client portfolios. Personal trading records of our employees are reviewed against internal and outside brokerage account confirmations and statements in a timely manner to identify any potential conflicts.
5. We prohibit employees from having Trading Authority or Power of Attorney over client accounts.
6. We provide our employees with a defined escalation procedure regarding when and how report material or potential conflicts of interest.

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7. We charge fees for advisory services based on a percentage that is disclosed in writing at the time an account is opened.
 8. Our remuneration structure for advisors and employees is designed to avoid rewarding behavior that could lead to the disadvantage of any client.
 9. Our compliance and supervisory staff's compensation is not tied to OmniVita's sales or revenue generation or to that of the registered individuals that they supervise.
 10. Employees are prohibited from receiving gifts, entertainment or any other benefits above a nominal value from clients.
 11. We have implemented policies concerning best execution procedures, client priority and the allocation of investment opportunities to ensure that clients receive trade execution ahead of our employees and receive a fair allocation of investment opportunities.
 12. We do not allow any of our employees to engage in activities outside the scope of their duties, including serving as a director of a company or other entity, without first seeking approval from senior management to ensure that such activities will not compromise the interests of our clients.
 13. We provide our employees with ongoing documented compliance training, which includes education about identifying, reporting, and addressing conflicts of interest.
 14. We understand that from time to time, other conflicts of interest may arise. We continue to take appropriate measures to identify and respond to such situations fairly and reasonably and in the best interests of our clients.
 15. Any future material conflicts of interest will be disclosed in writing to any clients it affects as they arise.

Should you have any questions regarding OmniVita's conflicts of interest policies and procedures please contact your advisor or direct comments to:

The Chief Compliance Officer
OmniVita Custom Wealth Management Inc.
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