

SECURITIES VOTING POLICY

- Responsibility:** Advising Representatives of Fund Accounts.
- Scope:** This Policy applies to all Advising Representatives registered with the Firm.
- Purpose:** To establish a policy for Advising Representatives with respect to securities voting for securities held in the Fund Accounts.

I. SECURITIES VOTING

QIFM's Advising Representatives, or delegates, are responsible for the voting rights with respect to the portfolio securities held by the Fund Accounts in accordance with the Firm's Securities Voting Procedures. Securities held in individual and institutional discretionary accounts will be voted by the applicable QIFM Advising Representative, or delegate, if the client has given QIFM authority to do so through a Client Directed Voting form.

As a general policy, the Fund Account Advising Representative, or delegate, should exercise his/her security voting rights in accordance with the recommendations made by management of the relevant security issuer. If the Advising Representative, or delegate, is unsure, he/she should consult the CCO, or delegate.

Unless required by the relevant securities legislation, the Advising Representative, or delegate, of a Fund Account may elect to not exercise the voting rights attached to a given security (that is, they may abstain from voting on matters relating to that security) if the Fund Account's holdings of such a security does not constitute a *'control'* position for that security in its registered jurisdiction.