

## ALARIS EQUITY PARTNERS INCOME TRUST

### EXTERNAL COMMUNICATIONS POLICY

#### POLICY

The objective of this policy is to ensure that the information contained in all communication with the public is consistent, accurate, fair and timely. To ensure these qualities are present, it is the policy of the Alaris Equity Partners Income Trust (**Trust**) that:

- The Trust will comply with all laws and regulations regarding public disclosure of material events, financial results and operations;
- The Trust is committed to non-selective, fair disclosure of information about the Trust without advantage or disadvantage to any participant in the financial marketplace;
- The Trust may voluntarily disclose any non-material information determined by senior management to be in the interest of stakeholders, shareholders, the investment community and the public that is not the subject of a confidentiality agreement;
- All disclosure to the media will be communicated by the Chief Executive Officer (**CEO**), Chief Financial Officer (**CFO**) of the Trust or their designate(s);
- All disclosure to the financial community, including investment analysts, brokers and current or potential investors will be communicated by the CEO, CFO or their designate(s); and
- All of the Trust's media releases, information prepared for the financial community, and all other Trust related information for public disclosure must follow the procedures for review and approval outlined herein.

The External Communications Policy applies to the Trust and all subsidiaries.

Management will be responsible for ensuring that this policy and related procedures are communicated and followed consistently in their operations.

Questions of interpretation should be directed to the CFO or Secretary.

Clarification of disclosure guidelines and procedures for preparation, review and approval of external communication materials follow.

#### DISCLOSURE GUIDELINES

##### Compulsory Disclosure

The Trust will comply with all laws and regulations regarding public disclosure of material events, financial results and operations including, without limitation, the following:

- National Policy 51-201 *Disclosure Standards*;
- National Instrument 51-102 *Continuous Disclosure Obligations*; and
- Toronto Stock Exchange rules and policies.

## **Voluntary Disclosure**

The Trust may disclose any non-material information determined by senior management, in consultation with the Disclosure Review Committee, to be in the interest of stakeholders, shareholders, the investment community and the public that is not the subject of a confidentiality agreement. All written reports properly labelled "Solicitor-Client Privileged Communication" or such other materials that are deemed subject to "Solicitor-Client Privilege", or similarly, may be released only on the advice of counsel.

## **PROCEDURES**

### **1.0 Disclosure Controls and Procedures**

The Disclosure Review Committee, consisting of the Secretary, the CEO, CFO and such of other senior officers as the foregoing may deem appropriate, shall assist the CEO and the CFO with respect to their responsibilities for disclosure controls and procedures including:

- (a) advising as to the materiality of certain information and what the attendant disclosure requirements may be; and
- (b) during the course of the preparation of the periodic reports, meet with the CEO and CFO to: review disclosure issues; assist in the evaluation of the design and effectiveness of the disclosure controls and procedures; and, review the periodic reports to ensure that they comply with all regulatory requirements and comply with exchange listing requirements.

### **2.0 News Releases, Teleconferences, News Conferences and Briefings**

#### **2.1 *News Releases***

The Audit Committee shall review the general types and the presentation format of news releases or other earnings guidance provided to analysts and rating agencies.

All news releases must be prepared in consultation with the CEO or CFO and relevant personnel.

All news releases must be reviewed for materiality and accuracy and approved by the Disclosure Review Committee.

All news releases should be approved by partners (e.g., investee companies) and Governments where applicable. All news releases, shall be approved by one of the CEO or CFO.

All quarterly and annual news releases regarding financial or earnings information will be reviewed by the Audit Committee.

All news releases shall be distributed by the CFO or his designate.

All non-ordinary course news releases shall be distributed to the Board of Directors prior to dissemination, for information purposes, regardless of whether the board and/or a specific committee approval is required.

#### **2.2 *Teleconferences, News Conferences and Briefings***

All external teleconferences (involving public audiences), news conferences and briefings must be arranged in consultation with the CEO or CFO.

All external teleconferences, news conferences and briefings must be approved by any one of the CEO, CFO or the Secretary.

### **3.0 Media**

ALL media inquiries or requests for interviews, statements or information must be forwarded to the CEO, CFO or their designate(s) for action.

In the event an initial statement to the media is required from the Trust's personnel responding to an emergency or crisis event, this statement will be provided by the designated on-site Media spokesperson and will be immediately reported to the CEO or CFO.

#### **3.1 *Media Preparedness***

For any event that involves Media coverage, functional personnel will assist the CEO or CFO to develop and review key messages and questions and answers (Q&A's) to ensure:

- consistency in information reported
- compliance with public disclosure requirements

### **4.0 Investment Analysts, Brokers, Unitholders**

All inquiries as to performance or status of the Trust's business operations or affairs are to be directed to the CEO or CFO or their designate(s).

### **5.0 Publications, Seminars or Presentations**

Trust related subject matters that meet any of the conditions of the Mandatory Review Conditions noted in Section 5.1 below will be subject to these Policy guidelines for Publications, Seminars or Presentations.

#### **5.1 *Mandatory Review Conditions***

Whether a document requires review and approval is based upon:

- the potential for controversy or significant publicity;
- the likelihood it may contain financial and operating information not previously disclosed to the public; and
- the breadth of circulation (internal or external audiences).

#### **5.2 *Guidelines to Publications, Seminars or Presentations***

Trust related subject matter (which meets any condition above) to be presented in external seminars open to public attendance, general corporate presentations to governments or partners and publication of papers or articles in journals or other media and public communications (which include advertisements, marketing-oriented communications, pamphlets, brochures, internet information, handbooks, appointment notices, speech or audio-visual presentations produced by or on behalf of the Trust, the Annual Report and corporate profiles) fall under the following guidelines:

The CEO, CFO or their designate(s) shall be responsible for pre-clearing all publications, seminars or presentations requiring same.

The Disclosure Review Committee shall be consulted if there are concerns as to materiality or corporate consistency.

The CEO, CFO or their designate(s) will, upon request, assist in the preparation of communication materials and maintain general information on the Trust and its performance that is available upon request.

### **5.3     *Securities Filings***

All securities filings, other than normal course press releases regarding non-material information (i.e., annual reports and filings, interim reports, debt or equity offerings), will be reviewed and approved by the Disclosure Review Committee. Securities filings for debt or equity offerings will also be reviewed by the Audit Committee.

All periodic securities filings relating to financial or earnings information (i.e., annual reports, interim reports), shall be reviewed by the Audit Committee before filing or any public announcements of the period covered.

### **6.0             Public Use of Name / Logo**

All requests involving the use of the Trust's name or logo (or the logos of any of the Trust's affiliates or subsidiaries) are to be pre-cleared with the Trust.

### **7.0             Electronic Communications**

This policy also applies to electronic communications. Accordingly, the disclosure committee is also responsible for ensuring that postings on the Trust's website are reviewed and approved and that such disclosure is accurate, complete, up-to-date and in compliance with relevant securities laws.

Disclosure on the Trust's website alone does not constitute adequate disclosure of information that is considered material non-public information. Any disclosures of material information on the website will be preceded by the issuance of a news release.

All continuous disclosure documents will be provided in the Investors section of the Trust's website. All information posted, including text and audiovisual material, will show the date the material was issued. Any material changes in information will be updated immediately, following issuance of a news release.

In accordance with this policy, employees, consultants, directors and insiders (including designated spokespersons) are prohibited from participating in Internet chat rooms or newsgroup discussions on matters pertaining to the Trust's activities or its securities.

### **8.0             Disclosure Standards**

#### **8.1     *Legal Compliance***

The Trust will comply with all laws and regulations regarding public disclosure of material events, financial results, operations and forward-looking information.

#### **8.2     *Non-Selective Fair Disclosure***

The Trust will strive to comply with responsible and effective practices in addition to regulatory requirements to ensure that all material information about the Trust is disseminated to the financial

marketplace without preference or advantage to any particular market participant – whether analyst or investor or otherwise. The Trust is also of the view that proper stewardship of the best interests of the Trust and its unitholders requires disclosure of its strategies, business plans and opportunities in a manner that builds investor confidence and respect for the Trust.

To ensure compliance with Canadian law on "selective disclosure" and National Policy 51-201, the Trust adopts the following practices:

### **8.3 *Authorized Representatives***

- (a) Persons authorized to communicate on behalf of the Trust to analysts, securities market professionals and shareholders of the Trust are limited to the Chair, the CEO or CFO or their designate(s), or the Secretary.
- (b) Other officers or employees of the Trust may communicate with analysts and investors as part of the Trust's investor relations program. No employee is authorized to communicate business or financial information about the Trust that is non-public, material information, except through sanctioned public disclosure.
- (c) All inquiries as to the performance or status of the Trust's business operations or affairs are to be directed to the CEO or CFO or their designate(s). All technical inquiries related to the ownership of shares are to be directed to the Secretary.
- (d) Appropriate training will be provided to each authorized representative on compliance with this policy, review of public statements regarding material information and procedures for disclosing non-public information.

### **8.4 *Quarterly Financial Statement Release and Other Conference Calls***

- (a) The Trust may hold quarterly investor conference calls open to the public and media (in listen-only mode), and provide public notice about the quarterly conference call through a press release as well as, by posting same on the Trust's website. The Trust may also hold other conference calls open to the public and media and, if so, provide public notice about the conference call through a press release as well as, by posting same on the Trust's website.
- (b) A playback of the conference call will be provided on the Trust's website after the conference call. This item will be moved to the archives section of the website and clearly identified as historic information a short time after first posted.
- (c) Any updates to quarterly conference calls will be pre-announced through press release and be made available for wide dissemination as would any quarterly conference call.
- (d) Estimates of the Trust's annual financial performance and estimates of operating performance consistent with industry accepted practice will be provided through public disclosure such as media releases or conference calls open to the public.
- (e) For two weeks before normal quarterly earnings and operating results announcements, the Trust will not comment on analysts' inquiries or rumours regarding these matters.
- (f) The Trust will review at least annually, its disclosure practices, which review will involve the Disclosure Review Committee in consultation with the CEO and CFO

### **8.5 *Presentations***

- (a) The Trust will use the safe harbour guidelines for forward-looking information as part of individual, group and conference investor communications formats.
- (b) The Trust may participate in securities firms' sponsored and other investor conferences. Information presented at such conferences will be posted on our website as it is updated.
- (c) Authorized representatives of the Trust will continue to meet with individual investors and groups of investors. The Trust will also participate in other public forums in which analysts or investors could be present including industry seminars, trade shows, annual voting interest holder meetings, and the like.
- (d) In any forum in which the Trust participates, the Trust does not intend to disclose any material non-public information during such meetings. If it is determined that material non-public information has been disclosed, appropriate public disclosure will be made promptly after any such inadvertent disclosure.
- (e) In conformance with this Policy, all presentations will be pre-screened by appropriate personnel and approved by authorized personnel to ensure compliance with this portion of the policy.

### **8.6 *Analyst Reports***

- (a) The Trust will not comment on published Analyst Reports, except for accuracy on publicly disclosed facts only. Appropriate representatives of the Trust may dialogue with analysts on facts and assumptions that they make in modeling the Trust's operations and performance, but will not comment on conclusions that they reach as a result thereof.
- (b) The Trust will not circulate or, in the case of electronic distribution, hyper-link to analyst reports for the purpose of providing them to shareholders or potential investors. If the Trust discloses on its website the names of analysts that cover its securities, it shall ensure that the list is complete as possible.

### **8.7 *Response to Rumours***

Absent a separate duty to disclose arising as a result of a material change or a material fact, or a stock exchange inquiry, the Trust takes the position that it will respond "We do not respond to market rumours or speculation" to hypothetical questions or rumours about the Trust.

### **8.8 *Exemption from Fair Disclosure Requirements***

There are of course circumstances where the Trust will disclose material non-public information to persons subject to duties to the Trust or confidence not to disclose the information or to make use of it. In these circumstances, including any circumstances that involve disclosure to a person who has agreed to receive information in confidence subject to a written or oral agreement, disclosure may be made. This includes disclosures to, including but not limited to, legal counsel, investment bankers, accountants and credit rating agencies.

In order to ensure that confidentiality of such information is maintained by the people to whom it is divulged, the Trust adopts the following practices:

- (a) Any employee or consultant of the Trust privy to confidential material information will be so advised and is prohibited from communicating such information to anyone else, unless it is necessary to do so in the course of business. Efforts will be made to limit access to confidential information to only those who need to know the information and those persons will be advised that the information is to be kept confidential.
- (b) Outside parties privy to undisclosed material information concerning the Trust will be told that they must not divulge this information to anyone else, other than in the necessary course of business and that they may not trade in the Trust's securities until the information is publicly disclosed. Such outside parties should confirm their commitment to non-disclosure in the form of a written confidentiality agreement.
- (c) To prevent the misuse or inadvertent disclosure of material information, the following procedures should be observed at all times:
  - i) Documents and files containing confidential information should be kept in a safe place, with access restricted to individuals who 'need to know' that information in the necessary course of business. Code names should be used if necessary;
  - ii) Confidential matters should not be discussed in places where the discussion may be overheard, such as elevators, hallways, restaurants, airplanes or taxis;
  - iii) Confidential documents should not be discarded where others can retrieve them;
  - iv) Employees must ensure they maintain the confidentiality of information in their possession outside of the office as well as inside the office;
  - v) Transmission of documents by electronic means, such as by fax, email or directly from one computer to another, should be made only where it is reasonable to believe that the transmission can be made and received under secure conditions;
  - vi) Unnecessary copying of confidential documents should be avoided and documents containing confidential information should be promptly removed from conference rooms and work areas after meetings have concluded. Extra copies of confidential documents should be shredded or otherwise destroyed;
  - vii) Confidential documents provided by third parties should be returned to such third parties if and when required according to the terms of any signed confidentiality agreement with that party. In addition, all memoranda, notes, reports and documents produced by the Trust in connection with the Trust's review of such confidential documents should promptly be shredded or otherwise destroyed, if and as required by the terms of a signed confidentiality agreement with that third party.

**8.9 Further Information**

All inquiries regarding the provisions or procedures of this policy should be addressed to the Secretary.

**Approved:** March 9, 2021

On Behalf of the Board:

A handwritten signature in black ink, appearing to read 'JR', is written over a horizontal line.

John Ripley  
*Chairman*