

Responsible Investment Policy

1. Background and Purpose of the Policy

Mackenzie Financial Corporation (“Mackenzie Investments”) is a leading investment firm providing investment solutions through a boutique structure to retail, strategic alliances and institutional clients (the “Accounts”) through mutual funds, exchange traded funds, separately managed accounts, and other solutions. Mackenzie Investments supplements its investment capabilities through the use of third-party external managers (“sub-advisors”) in selected areas.

The purpose of this Responsible Investment Policy (the “Policy”) is to formalize how we implement responsible investment principles for the Accounts managed by Mackenzie Investments. Our approach to responsible investment is centered on incorporating environmental, social and governance (“ESG”) criteria into the investment analysis and decision making process, and active ownership through engagement and proxy voting.

Fundamental to this Policy is our responsibility to act in the best interests of the Accounts. Our role is to exercise professional judgment on which financial and ESG factors will be drivers of long-term performance and risk for investments in the Accounts.

Our responsible investment approach provides further alignment between our investment activities and broader social and environmental objectives of society.

2. Principles for Responsible Investment

We believe that responsible investment in the mainstream investment decision-making process is best embodied by the United Nations-supported Principles for Responsible Investment (“PRI”). To confirm our approach to responsible investing, we became a signatory to the PRI in 2014 and committed to six voluntary, guiding principles.

Where consistent with the best interests of the Accounts, we will:

1. Incorporate ESG issues into investment analysis & decision making processes;
2. Be active owners and incorporate ESG issues into our ownership policies & practices;
3. Seek appropriate disclosure on ESG issues by the entities in which we invest;
4. Promote acceptance and implementation of the Principles within the investment industry;
5. Work together to enhance our effectiveness in implementing the Principles; and
6. Report on our activities and progress towards implementing the Principles.

We will also promote the acceptance of PRI with our sub-advisors and encourage their participation as signatories to the Principles.

3. Scope

This Policy applies to all Accounts managed by Mackenzie Investments.

4. Definitions

Responsible Investment is defined as an approach to investing that incorporates environmental, social and governance (ESG) factors into investment decisions, to better manage risk and generate sustainable, long-term returns.¹ Examples of ESG factors are numerous and ever-changing.

Environmental factors refer to issues impacting the natural environment, including but not limited to climate change, greenhouse gas emissions, resource depletion and water scarcity, waste and pollution, biodiversity and deforestation.

Social factors refer to issues affecting employees, customers, suppliers or society at large including but not limited to human rights, bribery and corruption, human capital management, diversity and inclusion, workplace health and safety, managing operations in conflict zones and community relations.

Governance factors refer to issues regarding how companies are 'governed' including but not limited to board composition and skills, executive remuneration, board diversity and structure, tax, accounting and audit practices.

¹ Source: PRI definition of responsible investment, <https://www.unpri.org/about/what-is-responsible-investment>

5. Integration of ESG criteria into the investment analysis and decision making process

Our investment processes require us to exercise professional judgment regarding drivers of value for the Accounts and we recognize that a broad range of financial and non-financial factors may be relevant in making investment decisions on behalf of the Accounts.

At Mackenzie, ESG factors are considered as part of the investment process. We recognize the relative importance of ESG factors varies across industries, geography and time. In analyzing the risks of investments in our actively managed mandates, our investment management teams look to identify, monitor and mitigate ESG risks and opportunities that are, or could become material to long-term performance.

In addition to integrating ESG factors into our mainstream investing practices, we also employ screening and thematic investment strategies for some of our Accounts, and manage exclusions for our institutional clients to address their unique ESG needs.

We also engage our sub-advisors to promote the inclusion of ESG factors into their investment processes, policies and practices where these are not employed today.

6. Active Ownership Through Engagement and Proxy Voting

Active ownership, including engagement with company management and proxy voting, are important value added practices within the investment processes employed in our Funds.

Engagement

We believe in the value of engaging in an active dialogue to seek to influence the company's approach on ESG factors that are material and relevant for each specific circumstance. The objective of ESG-focused engagement is to understand a company's position on material ESG issues, the actions it has taken to date, and any additional actions to be taken (or not taken). Engagement will be both proactive and reactive, as appropriate.

Regardless of sound ESG processes, there will be situations where ESG issues come to our attention, either through internal or external means. We generally adopt a policy of engagement, including escalating measures of engagement, to enable us to contribute positively to a company's ESG progress. Selling an investment for ESG reasons alone is an option of last resort. This means that very few companies would be screened out of our universe of eligible

investments, except where restricted by an Account's investment objective or otherwise by this Policy (see Section 8).

Proxy Voting

Proxy voting is an important component of active ownership and good governance. Consistent with our responsibility, we vote proxies in the best interests of the Accounts. For internally managed Accounts, proxy circulars, together with available proxy research, are reviewed in advance of a shareholder meeting date. Non-routine proposals may be given special attention and reviewed in detail within the context of the Proxy Voting Policy, including those of an ESG nature. A summary of our Proxy Voting Policy is included in the Annual Information Form for our retail mutual funds and a full copy is available upon request. Our proxy voting record is disclosed on our website for each retail mutual fund.

7. Collaborative action

In addition to direct engagement with companies, Mackenzie also believes in collaborative engagement to leverage internal resources, encourage transparency and improve ESG performance of the companies in which the Accounts invest. Where appropriate, we work with organizations and coalitions to encourage ESG changes and the development of responsible investment practices that are in the best interests of our Accounts and society, as a whole. Examples of collaborative actions include our involvement in the Canadian Coalition for Good Governance, and the Responsible Investment Association, and our parent company's involvement in the Carbon Disclosure Project (IGM Financial).

8. Policy on Cluster Munitions and Anti-Personnel Landmines

Mackenzie Investments supports the Anti-Personnel Landmines Convention and the Convention on Cluster Munitions, as international efforts aimed at addressing humanitarian concerns surrounding the use of these weapons.

As part of our commitment to these conventions, we will not knowingly invest in companies involved in the production, use or distribution of anti-personnel land mines or cluster munitions where we control the investment policy; excluding any investment policies where the objective is to replicate an index. For mandates where we do not control the investment policy, our clients may request different exclusions or no exclusions.

These exclusions apply to equity and corporate credit holdings, but do not apply to investments in derivatives or other index exposures where our exposure is indirect and outside of our control.

We have engaged an independent third party research provider to regularly supply us with a list of companies which are flagged for their involvement in cluster-munitions or anti-personnel landmines.

9. Governance

The Responsible Investment Policy is approved by the Mackenzie Investments Fund Oversight Committee of the Board.

Mackenzie Investments' Executive Vice-President, Chief Investment Officer oversees responsible investment policies and processes, including implementation of this Policy.

10. Policy Review

The Policy shall be reviewed at least every two years, or more frequently as required.

11. Reporting and Disclosure

In accordance with the PRI, Mackenzie Investments reports annually on its responsible investment activities. Our PRI Transparency Report is available publicly on the PRI website, and on our parent company's website at www.igmfinancial.com.