

With the likely re-emergence of multiple competitive marketplaces in Canada in January, Canaccord Capital Corporation and its affiliated entities (“Canaccord”) has prepared this policy to inform their clients of conditions and activities that could affect them in this new trading environment. If you have any questions regarding this policy, please contact your Investment Advisor.

1. Principal Marketplace

Unless notified otherwise by Canaccord, the principal marketplace for all securities listed on the Toronto Stock Exchange (“TSX”), whether or not the security is trading on other alternate marketplaces, will be the TSX.

The TSX operates between 9:30 am (Toronto local time) and 4:00 pm (Toronto local time), Monday through Friday, not including statutory holidays in Ontario. All references to time in this document are references to Toronto local time which is Eastern Standard Time or Eastern Daylight Savings Time when in effect.

2. Hours of Operation for Trading in Listed Canadian Securities

Canaccord trading staff and systems will be available for order execution during principal marketplace hours. Staff may be available outside of principal marketplace hours; however, Canaccord will not guarantee order taking and/or trade execution outside of the hours of 9:30 am to 4:00 pm.

3. Standard Handling of Orders

All orders received will be handled as follows:

- a) an order received prior to principal marketplace open (9:30 am) will book to the pre-opening of the principal marketplace (TSX) for execution on the opening. Orders received prior to marketplace open will not route to an alternative marketplace; and
- b) an order received after the principal marketplace close (4:00 pm) will be entered to the pre-opening of the principal marketplace (TSX) on the **following business day**. Orders received after marketplace close will not route to an alternative marketplace, and
- c) an order received during the principal marketplace operating hours will be entered into the best market at the time of entry. The “best market” is the marketplace with the best bid (buy price) or ask (sell price) or where Canaccord feels the order has the highest probability of being executed. This may be any marketplace that Canaccord has access to and/or can access for the purpose of best execution, and
- d) any portion of an order that cannot be immediately filled will be booked to the principal marketplace and will remain in the booked marketplace until the order is filled, expired, changed or cancelled.

4. Order Execution

Certain types of orders have specific handling implications in a multiple marketplace environment. These have been addressed as follows:

a. Day Orders

A Day Order is an order to trade that expires if it is not executed the day that it is booked to the marketplace. Day Orders will be handled in accordance with the “Standard Handling of Orders”. All Day Orders expire, if not filled in full, upon the close of the marketplace where the last portion of the order remains live, unless otherwise agreed to between the client and the Investment Advisor.

b. Good Til Cancelled Orders

Good Til Cancelled orders are orders that will remain open until a specified date of expiry. These orders will be entered in the principal marketplace (TSX) if they are not immediately executable on an alternative marketplace at the time of entry. The order will remain in the principal marketplace until executed or expiry, whichever comes first.

c. Market Orders

A Market Order is an order to buy or sell a security at whatever prices are available in the marketplace to help ensure a complete and full fill. Upon entry to the marketplace, these orders require immediate completion. Market Orders

Policy on Multiple Marketplace Trading January 2007

will be handled in accordance with the “Standard Handling of Orders”. These orders will expire, if not filled in full, on the marketplace where the last portion of the order remains live, at the close of the marketplace.

d. Limit Orders

A Limit Order is an order for a security at a specific minimum sale price or maximum purchase price that is not to be exceeded. Limit Orders will be handled in accordance with the “Standard Handling of Orders”. The order will expire, if not filled in full, upon the close of the marketplace where the last portion of the order remains live.

e. Special Terms Orders

Special Terms Orders are orders with specific terms that are not executable in the regular marketplace. Special Terms Orders will only post to the Special Terms Market of the principal marketplace, unless they are immediately executable on an alternative marketplace at the time of entry. Special Terms Orders will expire at the close of the principal marketplace.

f. Stop Loss Orders

Stop Loss Orders are orders that become limit orders when a board lot is traded at, or superior to, the stop loss price on the marketplace in which the order has been booked. These orders will only be directed to the principal marketplace (currently the TSX) until executed or expiry, whichever comes first.

5. Extenuating Circumstances

In the event of technical or other issues that limit Canaccord’s access to specific marketplaces or routing automation, orders received will be directed to the principal or alternative marketplace as determined by circumstances in the marketplace.

6. Disclosure of Marketplace

An order executed on one or more marketplace or alternative marketplace will be reported to the client using separate confirmations for each marketplace on which the order was filled. The marketplace on which the order was filled will be identified by name on the confirmation.

The following tables provide a summary of this policy.

| Standard Handling of Orders | |
|--|--|
| Orders received prior to principal marketplace open (9:30 am, Toronto time) | Order will be entered into the pre-opening of the principal marketplace (TSX) |
| Orders received after principal marketplace close (4:00 pm, Toronto time) | Orders will be entered into the pre-opening of the principal marketplace (TSX) on the following business day |
| Orders received during principal marketplace operating hours (between 9:30 am and 4:00 pm, Toronto time) | Orders will be entered into the best market at time of entry |

| Order Type | Standard Handling? | Specific Details |
|---------------------------|---------------------------------|---|
| Day Orders | YES | Day Orders will expire at close of the marketplace to which the order has been booked |
| Good Til Cancelled Orders | Only if immediately executable | Good Til Cancelled orders that cannot be immediately executed will be booked to the principal marketplace |
| Market Orders | YES | |
| Limit Orders | YES | |
| Special Terms Orders | Only if immediately executable. | Special Terms Orders that cannot be immediately executed will be booked to the principal marketplace |
| Stop Loss Orders | No | All Stop Loss orders are booked to the principal marketplace |

If you should have any questions related to this policy, please contact your Investment Advisor.