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## SUBSTANCE USE

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**Effective Date:** March 4, 2009

**Responsibility:** VP Student Services

**Amends Policy dated:** September 1, 1998

**Policy Number:**

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**Scope:** Students

### **Substance Use**

Seventh-day Adventists have a history of integrating principles of holistic health into daily living. This tradition includes abstaining from substances such as alcohol, tobacco and other drugs that could interfere with social, emotional, physical and spiritual health. Burman University (Burman) wishes to continue the Adventist history of promoting a holistic lifestyle among its students. The mission of Burman is to educate students to think with discernment, to believe with insight and commitment and to act with confidence, compassion and competence. As such Burman has developed a Substance Use Policy that has three primary goals:

1. Identification and early intervention of substance use among students.
2. Fair and equitable disciplinary action of substance use violations.
3. The development of a supportive and remedial environment that will enhance the spiritual and academic goals of the students attending Burman.

Burman believes that the problem of substance use prevents it from satisfactorily carrying out its mission with students. It is Burman's desire to help students who are faced with problems of substance use and provide a safe, drug free environment for all students at Burman. Students are required to comply with this policy as a condition of enrolment at Burman. Failure to comply will result in disciplinary action, up to and including permanent dismissal.

1. **Student Assistance:** Burman offers confidential counseling and support resources through the Student Success Centre. Students who suffer from substance use and other personal/ emotional and physical problems are encouraged to seek out the Student Success Centre for assistance. However, it is the responsibility of each student to seek assistance before performance and personal problems lead to disciplinary action.

Two organizations on campus help educate students to make healthy choices regarding addictions: Individuals Making Positive Accountable Choices Together (IMPACT) and Collegiate Adventist for Better Living (CABL).

2. **Prohibited Conduct:** No person may possess, use, produce, sell or distribute alcohol or other mind-altering substances, or possess paraphernalia for the purpose of drug use. The terms “alcohol, drugs and other substances” shall be construed to refer to alcohol and alcohol-containing beverages; all forms of tobacco; inhalable substances (such as gases, solvents, butane, propane, adhesives); marijuana or its derivatives; cocaine/crack; LSD or other hallucinogenic drugs; PCP; amphetamines and amphetamine-like compounds; heroin; methadone; scheduled narcotics; steroids; herbal/”natural” stimulants, herbal/”natural” euphoriant; look-alike products; and any substances commonly referred to as “designer drugs.” This would include inappropriate and/or illegal use of prescription and over-the-counter preparations.

The use of alcohol, tobacco or illegal drugs on or off university/college premises may be grounds for school discipline, which could include dismissal. Burman cannot protect the student from the natural consequences of breaking the law and students who are arrested and convicted for drug or alcohol related offenses will be considered in violation of this policy. It is expected that all enrolled students will uphold the principles of the university while on or off campus.

3. **Intervention Procedures:**

- a. **Under Legal Age:** If a student under the age of 18 is found in possession of mind-altering chemicals as defined in the previous section, the administration will, within legal guidelines, contact the parents and the local police (if it involves an illegal or controlled substance).
- b. **Searches:** When there is reason to believe that a specific student or group of students may be in possession of illegal drugs or alcohol, they may be required to submit to searches of their rooms, clothing, lockers, desks, lunch boxes, brief cases, cars or other personal property.
- c. **Reasonable Suspicion Testing:** Where a faculty/staff member has either “cause to believe” or a “reason to suspect” a student’s use of alcohol or drugs or the student’s performance is impaired or a student is unfit for class, the university may require the student to submit to a drug and/or alcohol test. The faculty/staff or designated university official who may make a reasonable suspicion determination shall have been trained in recognizing signs and symptoms of impairment and in effective methods of intervention.
- d. **Positive Test Results:**
  - i. **Drugs Tests -** Students with a confirmed positive drug test will be suspended and referred to the Director of Counseling and Career Development for assessment. From that assessment, the Director of



- Counseling will provide a recommendation of appropriate support to the Vice President of Student Services.
- ii. Alcohol Tests - Results of blood alcohol concentration (BAC) of 0.05 or greater are considered a positive test.
  - iii. Tobacco Infractions - Any students who fail to adhere to the campus wide no smoking policy will be in violation of this policy.
- c. Refusal to Test: The following constitutes a refusal to test:
- i. Refusal to submit to an alcohol or drug test
  - ii. Attempts to tamper with an alcohol or drug test
- A refusal to test is considered a positive test and the procedures for dealing with a positive test will be followed.
- f. Trafficking: The trafficking of illegal or controlled substances is a criminal offence. Therefore, anyone found guilty of this act will be asked to withdraw as a student at Burman U and cannot be protected by the university from the natural consequences of the law.
- g. Voluntary Admission of Substance Use: Students who recognize a need and desire to develop a drug-free lifestyle may wish to voluntarily seek assistance from the Director of Counseling and Career Development. No disciplinary action will be taken if the student initiates (without prior knowledge by university representatives) a voluntary effort to seek assistance and is faithful in following the plan established for personal growth. This initiated effort will remain strictly confidential between the Director of Counseling and Career Development and the student.
4. **University Sanctions:** Disciplinary sanctions and procedures for failure to comply with the terms of this policy will be implemented as follows:
- Step 1** Test results: The student will be informed of the violation of the policies set forth in this document by the Vice President of Student Services or his/her designate.
- Step 2** Suspension: The student will immediately be suspended from classes until he/she has satisfactorily completed all readmission requirements.
- Step 3** Evaluation: Prior to being considered for readmission the student will undergo a risk assessment to determine his/her level of involvement with mood altering substances. The assessment will be conducted by the Director of Counseling and Career Development or a professional counselor appointed by the university.



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## ETHICAL GUIDELINES FOR ACCEPTING DONATIONS

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**Effective Date:** September 1, 2009

**Responsibility:** Vice President Financial Admin

**Amends Policy dated:** \_\_\_\_\_

**Policy Number:** F 180

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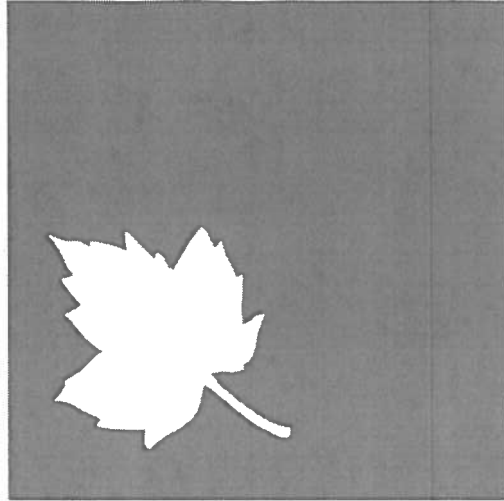
**Scope: All donations offered to the University.**

The University will not knowingly accept donations from corporations, foundations, organizations, events or individuals, nor will it participate in, or endorse an event, or employ third party fundraisers that are not supportive of its goals. The University will not allow product representations of its logo on any corporate sponsorship. Furthermore, the University will not allow access to its consumers for promotional media or advertising without the express written consent of the consumer or consumers' parent or guardian (if applicable). In addition, the University will not allow open access to its employees for promotional media, advertising, or perceived gain without the express written consent of Cabinet.

Companies promoting, producing or selling the following products shall not be considered for direct corporate sponsorship: cigarettes, tobacco, or alcohol including wine, beer or spirits. Those donations in question will be review by Cabinet on a case by case basis for acceptability.

**Criminal Activity**

The University will not knowingly accept donations from any funding source involved in any criminal activity past or present.



**CANADIAN  
UNIVERSITY  
COLLEGE**

**STATEMENT OF INVESTMENT POLICY AND  
PROCEDURES**

## Table of Contents

<b>STATEMENT OF INVESTMENT POLICY AND PROCEDURES</b> .....	1
SECTION I , GENERAL .....	2
SECTION II , ADMINISTRATION .....	3
SECTION III , FUNDS OVERVIEW .....	5
SECTION IV , PERMITTED CATEGORIES OF INVESTMENT .....	6
SECTION V , ASSET ALLOCATION POLICY .....	11
SECTION VI , PORTFOLIO DIVERSIFICATION AND CONSTRAINTS .....	13
SECTION VII , LOANS AND BORROWING .....	16
SECTION VIII , VOTING RIGHTS .....	17
SECTION IX , VALUATION OF INVESTMENTS .....	18
SECTION X , RELATED PARTIES AND CONFLICTS OF INTEREST .....	19
SECTION XI , MONITORING INVESTMENT PERFORMANCE .....	22
SECTION XII , POLICY REVIEW .....	23
SECTION XIII , ACKNOWLEDGEMENTS .....	24

## SECTION I , GENERAL

- 1.1 This document constitutes the Statement of Investment Policies and Procedures (the "Policy") applicable to the assets (the "Fund(s)") held in respect of the Canadian University College (the "University College"), including the Operating Funds, Endowment Funds, Heritage Funds, and Other Restricted Funds.
- 1.2 The purpose of this Policy is to formulate those investment principles, guidelines and monitoring procedures which are appropriate to the needs and objectives of each Fund, in a manner conforming to the applicable rules and legal requirements of the management of the Funds.
- 1.3 Any investment manager or other party providing services in connection with the investment of the Fund(s) shall accept and adhere to this Policy.

## SECTION II , ADMINISTRATION

- 2.1 The University College established a governance structure which holds the President responsible for all aspects of the University College's operations. The President, working through the administrative team (Cabinet) has delegated to the Investment Committee (the "Committee") all aspects of the Funds' investment as stipulated in this document.
- 2.2 In fulfilling its responsibilities, the Committee may delegate to or otherwise utilize employees or contract personnel of the University College where appropriate. The Committee shall retain responsibility and utilize suitable personnel for such activities and monitor the activities undertaken by the selected personnel. Any reference in the Policy to Committee shall be interpreted as referencing the appropriate delegate.
- 2.3 A recognized custodian shall be selected for the Fund(s) (the "Custodian"). All investments and assets held by the Custodian shall be invested:
- (a) in a name that clearly indicates that the investment is held in trust for the University College and, where the investment is capable of being registered, registered in that name, or
  - (b) in the name of the Custodian, or a nominee thereof, in accordance with an agreement with the Custodian that clearly indicates that the investment is held for the University College, or
  - (c) in the name of The Canadian Depository for Securities Limited, or a nominee thereof, in accordance with an agreement with the Custodian that clearly indicates that the investment is held for the University College.
- 2.4 Where the Committee desires to invest in segregated funds of an insurance company, pooled funds or mutual funds ("Pooled Funds"), the Committee must satisfy itself that the investment policy of such Pooled Fund is consistent with this Policy.



- 2.5 Neither the Committee nor any employee of the University College shall select securities on behalf of the Fund except for the selection of Pooled Funds by the Investment Committee. The Committee shall retain one or more independent professional investment managers (the “Manager(s)”) to invest the Fund(s).
- 2.6 The Committee shall maintain a description of the manager structure and keep a current copy of the Statement of Investment Policy and Procedures signed by each Manager.
- 2.7 The Committee may rely on independent experts for certain aspects of the Fund's operations where expert knowledge is required or desired or where a potential or actual conflict of interest exists.

## SECTION III , FUNDS OVERVIEW

- 3.1 **Operating Funds** – are those funds on hand which are not needed to fund operating and/or capital expenditures of the immediate period. These funds are held in an operating account and may be invested on a short term basis to generate investment income. Funds may be required for use by the University College upon 30 days notice.
- 3.2 **Endowment Funds** – are those funds comprised of externally restricted contributions subject to stipulations specifying that the resources contributed be maintained permanently. The annual income from the funds may be disbursed to the University College as of November 30 each year to be used for purposes according to the restriction.
- 3.3 **Heritage Funds** – are those funds designated as “Heritage Funds” by the University College and its Board of Trustees. Comprised mainly of gains from sale of real estate assets. The income generated by these funds may be disbursed to the University College at least annually (monthly or quarterly disbursements may be required depending on the designated use of income, and the cash flow situation of the University College).
- 3.4 **Other Restricted Funds** – are those funds comprised of contributions subject to externally imposed stipulations, the annual income and principal of which may be disbursed as needed to the University College to be used for the restricted purpose intended.

**SECTION IV , PERMITTED CATEGORIES OF INVESTMENT**

4.1 From time to time, and subject to this Policy, the fund(s) may invest in any or all of the following asset categories and subcategories of investments, subject to eligibility as indicated, either directly or through Pooled Funds which hold only these investments. For purposes of this Policy, "governments" includes supranational, Canadian federal, provincial or municipal governments, and securities guaranteed by these governments. All short-term securities purchased must have adequate market liquidity, and must be rated A-1, P-1, or equivalent except those issued by a sovereign government, or an agency thereof guaranteed by that government.

<b>Investment Vehicle – Short-Term Funds</b>
Certificates of Deposit of insured institutions, up to insured limit
General Conference [of the Seventh-day Adventist Church] Unitized Money Fund or other money market funds with assets in excess of US\$250,000,000
Union revolving funds [of the Seventh-day Adventist Church in Canada]
<b>Investment Vehicle – Intermediate-Term Funds</b>
All Investment Vehicles included under Short-Term Funds
Marketable bonds rated investment grade or better by Standard and Poor’s, Moody’s, Dominion Bond Rating Service, or Canadian Bond Rating Service. For split rated securities the lowest rating will apply.
Intermediate-term issues with up to four years average life unless matched for specific liability dates. Intermediate-term investments include: <ul style="list-style-type: none"> <li>▪ Securities that, over a four-year period, have an average life of less than forty-eight months.</li> <li>▪ General Conference Unitized Bond and Income Funds</li> <li>▪ Special temporary employee loans</li> </ul>

Other intermediate-term issues with an undetermined average life:

- Union deposit funds
  
- Convertible bonds, convertible into common stock, Real Estate Investment Trusts (REIT's) and preferred stock are considered equity securities and thus are prohibited from being purchased as fixed income securities.

**Investment Vehicle – Long-Term Funds**

All Investment Vehicles included under Short-Term Funds, as well as those included under Intermediate-Term Funds

Intra-denominational loans adequately secured by recorded mortgage or parent organization guarantee, deeds of trust or chattel mortgages on equipment, and interest-bearing with a repayment schedule. In addition, loans to denominational organizations within the loaning entity's territory but not under its jurisdiction, shall require either a guarantee or a "no objection" from the controlling committee of the parent organization

All equity focused General Conference Unitized Funds

Vendor contracted investment funds as arranged by the General Conference Investment Office

Fixed Income:

- G-8 Government and Agency Securities
- Corporate notes and bonds maturing within thirty years
- First mortgages on an employee primary residence with up to 90 percent loan to value and repayment through a payroll deduction
- General Conference Bond and Income Unitized Funds or an income fund with a thirty-six month average life

Registered, open-end (mutual) funds (Funds shall be evaluated as to types of fees and the impact upon performance)

Exchange Traded Funds (ETF's)

Well capitalized, non-speculative Real Estate Investment Trusts (REIT's) listed on a recognized exchange

**Investment Vehicle – Special Consideration Securities (approval required from SDACC Investment Oversight Committee)**

Banker's acceptances created in international trade (short-term)

Commercial Paper (short-term)

G-8 Government and government guaranteed agency securities with less than one year to maturity or government issuances denominated in the currency of the controlling organization (short-term)

Corporate securities, which satisfy all of the limitations stated above, with less than one year to maturity (short-term)

Common stocks, American Depository Receipts (ADR's) of foreign companies, and ordinary shares of non-U.S. securities or warrants thereon, listed on recognized exchanges (long-term)

Preferred Stocks rated investment grade or better (long-term)

Convertible securities including debentures rated investment grade (long-term)

Sales and repurchase of covered calls listed on a recognized exchange (long-term)

Mortgage and other asset backed securities maturing within thirty years with the following exceptions: (long-term)

- Subordinated debt is prohibited
- All collateralized obligations must be rated AA or better
- Interest Only (IO's), Principal Only (PO's), Inverse floaters and all other leveraged tranches are prohibited
- Syndicated real estate mortgages limited to 80 percent of the fair market value of the collateral
- Private debt placements secured by an irrevocable letter of credit issued by institutions rated A-1 or P-1 or its equivalent

Real Estate syndicated with institutional investors and representing no more than 25 percent interest in the property(ies) or if single property principally owned, investment shall require professional consultation and management advice and prior approval by the controlling committee (long-term)

High yield bonds (long-term)

Partnerships investing in equity securities which are managed defensively (long-term)

Derivative contracts may be used to reduce or manage the risk exposure of a portfolio when used in combination with the other portfolio holdings and within the context of the manager's overall strategy (long-term)

- Contracts can be used in lieu of cash market transactions only when fully documented and when their valuation, execution and/or cost provide relative advantages
- Adequate liquidity for contract margin requirements must always be coordinated within the overall manager's strategy
- Asset sales for cash must be accomplished in an orderly way
- The manager may utilize derivative contracts to replicate the risk/return profile of an asset or combination of assets provided that the guidelines allow such exposures with the underlying assets themselves. Derivatives may not be used to produce exposure to an asset, asset class, index, interest rates, or other financial variables that would not otherwise be allowed in the portfolio guidelines where derivative contracts are not allowed

#### Other Investments:

- 4.2 The Fund(s) may not invest in categories of assets or instruments not specifically provided for in this Section, including but not limited to commodities, precious metals, bullion or collectibles.

## SECTION V , ASSET ALLOCATION POLICY

### Asset Allocation

- 5.1 The normal asset allocation reflects a balance of investments in bonds, which are sensitive to interest rates, and equities, which are expected to provide both higher returns and inflation-sensitive returns over the long term. Consideration was given to the factors outlined in Section III, and
- (a) the long-term nature of the fund(s),
  - (b) the University College's ability to absorb cost fluctuations, and its sensitivity to changes in interest rates.
- 5.2 The normal allocation and ranges for the various Funds have been determined as outlined below. Over complete market cycles the allocation is expected to approximate the "target" percentages.

Component Asset Class	Operating & Other Restricted			Endowment			Heritage		
	Min.	Target	Max.	Min.	Target	Max.	Min.	Target	Max.
<b>Equity Investments:</b>									
Canadian Equities	0%	0%	0%	0%	30%	40%	0%	30%	40%
Foreign Equities	0%	0%	0%	0%	20%	30%	0%	20%	30%
<b>Total Equities</b>	0%	0%	0%	0%	50%	60%	0%	50%	60%
<b>Fixed Income:</b>									
Fixed Income	85%	100%	100%	20%	50%	100%	25%	30%	100%
Cash & Cash Equivalents	0%	0%	15%	0%	0%	15%	0%	0%	15%
<b>Total Fixed Income</b>	100%	100%	100%	20%	50%	100%	25%	30%	100%
<b>Other:</b>									
Board-approved investments	0%	0%	0%	0%	0%	25%	0%	20%	40%
<b>Total All Assets</b>		100%			100%			100%	

- 5.3 Additional cash and cash equivalents may be held from time to time on a short-term, temporary basis or as defensive reserves within the portfolios for each asset class at the discretion of each Manager within the constraints prescribed by its Mandate.



- 5.4 If the asset mix deviates outside the above ranges, at the end of any quarter, the Investment Manager shall take corrective action to bring the asset mix back within the range as soon as practicable.

#### Return Objectives and Risk Expectation

- 5.5 The objective for the Endowment Fund and Heritage Fund returns is to achieve a long-term total rate of return, including, where applicable, capital gains, dividends, and interest income, net of all investment brokerage expenses, at least equal to the annual change in the Consumer Price Index for Canada + 5% per annum with a minimum nominal return of 7% per annum. This objective should be viewed as an average annual compound return to be sought over one or more complete market cycles, ie., over a 5 year period.

- 5.6 In order to achieve the long-term return objective, the Fund(s) is (are) targeting to achieve over moving four-year periods a return, net of all brokerage expenses but before all other fees, at least equal to a composite index made of passive investments in appropriate market indices, according to the normal allocation defined in section 5.2 and calculated as follows:

25% TSE 300 (10% capped) Total Return Index  
+25% MSCI World (Ex-Canada) Total Return Index (in Canadian dollars)  
+50% Scotia Capital Universe Bond Index,  
rebalanced quarterly.

- 5.7 The risk inherent in the investment strategy over a market cycle (a five year period) is three fold. There is a risk that the market returns will not be in line with expectations. To the degree that an active management style is employed, there is a risk that the added return expected of active management over passive management will not be realized, or will be negative. There is also the risk of annual volatility in returns which means that in any one year the actual return may be very different from the expected return (such return may also be negative).

## SECTION VI , PORTFOLIO DIVERSIFICATION AND CONSTRAINTS

- 6.1 In respect of the total Funds, no more than 5% of the market value of the assets shall be invested in the securities of any one issuer other than government debt.
- 6.2 In respect of the total Funds, no more than 5% of the market value of the assets shall be invested in emerging markets.
- 6.3 In respect of the total Funds, no more than 15% of the market value of the assets shall be invested in any one industry.
- 6.4 In respect of the equity portfolio of the Fund(s):
- (a) North American holdings shall be diversified by stock, capitalization and industry, having regard to the relative sizes of industry sectors in the applicable stock market indices.
  - (b) Non-North American holdings shall be diversified by stock, region, industry and country, having regard to the relative sizes of economic activity and stock market capitalization.
  - (c) Private placements shall be permitted where it is reasonably expected that the security will be listed on a recognized exchange within 12 months of purchase and shall be limited to no more than 5% of the portfolio.
  - (d) The Fund(s) shall not hold more than 4.9% of the total equity of any other entity.
- 6.5 In respect of the fixed income portfolio of the Fund(s):
- (a) If a bond's credit rating falls below that which is required after the time of purchase, the Manager shall remove it from the portfolio as soon as practicable.
  - (b) Hybrid bonds may not be acquired.
  - (c) The maximum holdings of debt of any single corporate issuer shall be limited to 5% except where the debt is fully guaranteed by the government of Canada or any provincial government having a debt rating of at least "AA".

- (d) Not more than 15% shall be held in mortgage-backed securities, and all such securities shall be fully guaranteed by the Government of Canada or a province of Canada having at least an "A" credit rating.
  - (e) Not more than 15% of the portfolio shall be held in securities denominated for payment in foreign currency.
  - (f) The aggregate duration of the portfolio shall be maintained within two years of the Scotia Capital Universe Bond Index.
  - (g) Bonds of unrated issuers will be assumed to fail all of the credit ratings referred to in this section.
- 6.6 All cash equivalents, including those held within the portfolios for each asset class at the discretion of the Manager, shall have a minimum credit rating of "R-1 (low)" or equivalent. If a security's credit rating falls below "R-1 (low)" after time of purchase, the Manager shall remove it from the portfolio as soon as practicable. Securities of unrated issuers will be assumed to fail all of the credit ratings referred to in this section.
- 6.7 For purposes of sections 6.4 and 6.5, all debt ratings refer to the ratings of Dominion Bond Rating Service unless otherwise noted, however, equivalent ratings by another major credit rating agency can be used.
- 6.8 The Manager will not directly invest in the securities of firms whose primary business is in the following industries:
- (a) Alcohol;
  - (b) Tobacco;
  - (c) Gambling; and
  - (d) Pornographic materials.

- 6.9 Notwithstanding Sections 6.3 to Section 6.7, it is recognized that the Manager can not necessarily adhere to these standards within a Pooled Fund. However, the Manager will be expected to inform the Committee if there is likely to be a significant breach of these standards. All pooled funds will be reviewed by the committee..

## SECTION VII , LOANS AND BORROWING

- 7.1 No part of the Funds shall be loaned to any party, other than through the purchase of debt instruments permitted under Section 4.1 and which otherwise meet the requirements of this Policy.
- 7.2 Money shall not be borrowed on behalf of the Funds and the Funds' assets shall not be pledged or otherwise encumbered in respect thereof, except:
- (a) for and to the extent of temporary overdrafts that occur in the course of normal day-to-day portfolio management
- 7.3 The Fund(s) shall not participate in securities lending, except indirectly through investment in Pooled Funds.

## SECTION VIII , VOTING RIGHTS

- 8.1 The responsibility of exercising and directing voting rights acquired through Fund investments shall normally be delegated to the Manager, who shall at all times act prudently and in the best interests of the University College. The Manager shall provide a copy of their voting rights policy to the Committee.
- 8.2 The Manager shall maintain a record of how Fund(s) voting rights have been exercised.
- 8.3 In case of doubt as to the best interests of the Fund's beneficiary, the Manager shall request instructions from the Committee and act in accordance with such instructions.
- 8.4 The Manager shall be required to advise the Committee and provide details in advance of the vote when the Manager has acquired on behalf of himself and his clients 10% or more of that class of securities.
- 8.5 The Committee reserves the right to direct, or override, the voting decisions of a Manager, if in its view such action is in the best interests of the Fund's beneficiary.
- 8.6 It is recognized, however, that the above constraints and policy on voting rights may not be enforceable to the extent that part of the Fund is invested in Pooled Funds.

## SECTION IX , VALUATION OF INVESTMENTS

- 9.1 Investment in publicly traded securities shall be valued by the Custodian for the Fund(s) no less frequently than monthly at their market value.
- 9.2 Investment in Pooled Funds comprising publicly traded securities shall be valued according to the unit values calculated at least monthly by the custodian of the Pooled Funds. The Custodian shall be responsible for requesting and recording the unit values on a monthly basis.
- 9.3 The University College has chosen to classify investment instruments as “Held-for-Trading” under CICA guidelines and therefore requires market valuation as of the University College’s fiscal year end of April 30 each year based on the closing bid price. (If there is no bid price the price of the most recent transaction may be used.)
- 9.4 If a market valuation of an investment is not readily available, then a fair value shall be determined by or at the discretion of the Committee. For each such investment, an estimate of fair value shall be supplied by the Manager to the Custodian no less frequently than quarterly. Such fair value may be determined by reference to the most recent independent expert appraisal or by other means such as risk-adjusted discounted cash flows or comparison with similar assets which are publicly traded. In all cases the methodology should be applied consistently over time.

Independent expert appraisal of each such non-traded investment shall be obtained by or for the Committee under the following schedule:

<b>Non-traded individual investment as % of Fund at market value</b>	<b>Minimum Frequency of appraisal</b>
Less than ½%	Not required
½% to 2%	Tri-annually
2% or more	Annually

## SECTION X , RELATED PARTIES AND CONFLICTS OF INTEREST

### 10.1 Definition

For the purposes of this Policy, a Related Party means:

- (a) the University College,
- (b) a member of the Committee,
- (c) an officer, director or employee of the University College,
- (d) a person responsible for investing the assets of the University College, or any officer, director or employee thereof,
- (e) association or union representing employees of the employer, or an officer or employee thereof,
- (f) the spouse or a child of any person referred to in any of paragraphs (b) to (e),
- (g) an affiliate of the University College,
- (h) a corporation that is directly or indirectly controlled by a person referred to in any of paragraphs (a) to (g), or
- (i) an entity in which a person referred to in paragraph (a), (b), (c) or (f), or the spouse or a child of such a person, has a substantial investment.



## 10.2 Related Party Transactions

- (a) The assets of the Fund(s) shall not be used to invest in securities of Related Parties or lent to any Related Parties unless such securities are publicly traded and selected by a Manager acting independently on behalf of all that Manager's discretionary accounts or Pooled Funds having mandates similar to that of the Fund. Where applicable, a Manager shall provide the Committee with its internal guidelines on purchasing securities of the members of the Manager's organization or affiliates.
- (b) The assets of the fund(s) shall not be assigned to managers or organizations who are related parties.
- (c) Notwithstanding paragraph (a), the assets of the Fund shall not be invested in any securities of the University College, an affiliate of the University College or such employer unless such securities are publicly traded, held within a Pooled Fund, and selected by a Manager acting independently.
- (d) Any other transactions with a Related Party, must:
  - (i) be required for the operation or administration of the fund(s), and
  - (ii) be on terms and conditions that are not less favourable to the University College than the then market terms and conditions.

## 10.3 Conflicts of Interest

- (a) If a member of the Committee, or any agent of or advisor to the Committee, or any person employed in the investment or administration of the Fund has or acquires any material interest, direct or indirect, in any matter in which the Fund is concerned or may benefit materially from knowledge of, participation in, or by virtue of an investment decision or holding of the Fund(s), the person involved shall as soon as practicable disclose this conflict of interest to the Chair of the Committee. The Chair shall then immediately advise all members of the Committee, and the Committee shall decide upon a course of action. Any such person will thereafter abstain from any decision making with respect to the area of conflict, unless otherwise determined by unanimous decision of the remaining members of the Committee.

- (b) Every disclosure of interest under this Section shall be recorded in the minutes of the relevant Committee meeting.
- (c) The failure of a person to comply with the procedures, described in this Section, shall not of itself invalidate any decision, contract or other matter.
- (d) The Committee shall satisfy itself that an appropriate policy regarding conflicts of interest exists and is followed by any Manager appointed by the Committee. As a minimum, the Code of Ethics and Standards of Professional Conduct adopted by the Chartered Financial Analyst Institute shall be expected to apply to such Manager.

## SECTION XI , MONITORING INVESTMENT PERFORMANCE

- 11.1 The Committee shall review on a regular basis, as needed, and at least once a year:
- (a) the assets and net cash flow of the Fund
  - (b) the current asset mix of the Fund
  - (c) statistics on the investment performance of the Fund and each Manager relative to the objectives of the Policy and of the Mandates
  - (d) portfolio holdings
  - (e) the fees and expenses incurred in managing the Fund.
- 11.2 The Committee shall meet at least once a year with the Manager to discuss investment performance, investment strategies, expected future performance and any changes in the Manager's organization, investment processes and professional staff.
- 11.3 The primary focus of performance assessment will normally be on a moving five-year basis, but performance over shorter time periods and the Manager's performance for other comparable accounts prior to appointment for the Fund may also be considered. The Manager will not necessarily be faulted for under performing the agreed standard over short time periods. However, the Committee may conclude that significant short-term under performance renders it unlikely that the performance standard can reasonably be achieved at an appropriate risk level over the remainder of a market cycle.

## SECTION XII , POLICY REVIEW

12.1 This Policy shall be reviewed at least annually in order to determine whether any modifications are necessary or desirable. Such review shall consider whether there has been:

- (a) significant revisions to the expected long-term trade-off between risk and reward on key asset classes
- (b) a significant shift in the financial risk tolerance of the University College
- (c) shortcomings of the Policy that emerge in its practical operation
- (d) significant recommendations by a Manager
- (e) changes in applicable legislation.

12.2 A copy of this Policy and any amendments to it shall be delivered to the manager for the Fund(s).

**SECTION XIII , ACKNOWLEDGEMENTS**

This statement has been approved by the Investment Committee this \_\_\_\_\_ day of \_\_\_\_\_, 2008

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Name and Title

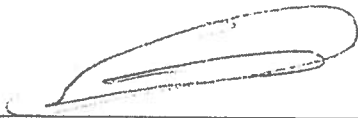
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Signature

\_\_\_\_\_  
Name and Title

SECTION XII , ACKNOWLEDGEMENT

This mandate shall be adhered to by 1832 Asset Management

Signed and dated this 13 day of Jan., 2015



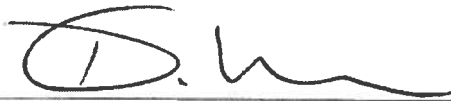
Signature

Donald MacDonald, VP of Portfolio Manager

Name and Title

This mandate is confirmed by Canadian University College

Signed and dated this 12<sup>TH</sup> day of JAN, 2015



Signature

DARRELL HUETHER  
V.P. FINANCE

Name and Title