



**Optimize  
Wealth Management**

# Compliance Best Practices for **Wealth Planners**



# Best Practices Handbook for Compliance

Please review the below best practices as it relates to your role as a Wealth Planner and the types of communications and responsibilities you have with clients of Optimize.

Topic	Best Practice
Understanding and Providing Compliant Relationship Management	Follow the outlined guidelines for interacting with clients in a service-oriented and compliant basis
Understanding and Avoiding what Constitutes Registrable Activities	Have a strong understanding of exactly which activities fall within the scope of registrable activity and how to avoid them
Knowing our Advertising and Social Media Approval Policies	Prior to any advertising or posting online content, submit the content for its required compliance review and approval in writing
Permitted use of Firm Brochures, Websites, and Marketing Content	In any instance where you provide or a client requests to receive additional information regarding Optimize, please follow the protocols
Managing Potential Conflicts of Interest	Manage, Disclose, and Avoid potential conflicts of interest when interacting with and servicing clients
Helping to Identify Vulnerable Clients	Quickly identify potentially vulnerable clients to request additional oversight on their accounts
Helping to Identify a Client's Trusted Contact Person (TCP)	Help clients designate and identify a Trusted Contact Person should they become incapacitated or unreachable for an extended period of time
Understanding, Reviewing, and Following our Policies and Procedures Manual	Regularly review and annually commit to our Policy and Procedures Manual to ensure your ongoing interactions remain compliant and client-focused
Using your Optimize Email and Approved Signature Format for all Communication with Clients	Ensure that all communication with clients is done through your Optimize email address along with our pre-approved email signature format
Following our Client Complaint Submission Process	Understand and follow our Complaint Handling Process

## RELATIONSHIP MANAGEMENT

### Understanding and Providing **Compliant Relationship Management**

#### Follow the outlined guidelines for interacting with clients in a service-oriented and compliant basis

Employees and/or Optimize representatives such as Wealth Planners, who are not securities licensed, are not allowed to conduct any registrable activities such as providing investment advice or facilitating securities related transaction activities. The below activities however are permitted by such employees:

Responsibility	Overview
Providing Relationship Management Services	Provide Clients with Ongoing Relationship Management and Support. Scheduling KYC/Portfolio Update Discussions with the Client, the Registered Representative, and Themselves
Account Servicing	Provide General Client Servicing which does not involve Securities and Investment advice, e.g., accepting documents to forward to Optimize Head office
Financial Planning	Create and Update Financial Plans as Clients and their Unique Situations Evolve
Tax Preparation	Complete Tax Preparation Forms and Review Tax Returns with Clients
Will Preparation	Review and Assist Clients in Completing Will Preparation Documents
Insurance Services	If appropriately licensed, Provide Customized and Personalized Insurance Solutions
Client Complaints	Record, Accept and Forward any non-service related Client Complaints and Mail to <a href="mailto:compliance@optimize.ca">compliance@optimize.ca</a>

### Understanding and Avoiding what **Constitutes Registrable Activities**

#### Have a strong understanding of exactly which activities fall within the scope of registrable activity and how to avoid them

On the following page are some of the main activities which require securities licensing and are registrable. Accordingly, unless you are a licensed representative under Optimize, please do not communicate verbally and/or via written correspondence on any services that fall under the scope of registrable activities. Non-licensed employees are required to immediately direct all questions/inquiries which pertain to the duties outlined below to their assigned Associate Advising Representative or Advising Representative.

Responsibility	Overview
Provide Investment Advice	Solicit an investment purchase from a client or provide securities advice
Hosting Onboarding Client Discussions	Review the client's unique investment situation and assign an appropriate investment model, ensure the client has the correct fee and account disclosures, as well as clarify the distinction of responsibilities of the Registered Representative's from that of the Wealth Planner
KYC Completion	Ask the client a variety of 'KYC' questions to garner the complete picture of the client's financial situation
Model Selection	In conjunction with both quantitative and qualitative questions, select an investment model that aligns with the client's particular risk and return profile
Conducting Annual KYC/ Portfolio Discussions	Conduct client discussions to review the client's portfolio performance, their assigned model(s), current market conditions, and review the current KYC on file
Handling Ad Hoc Questions Related to a Portfolio and its Performance	Answer any ad hoc investment related questions as to a client's portfolio, its performance, as well as assess whether or not to change the assigned investment model
Handling Client-Directed Trade Requests	Discuss any client-directed trade requests with the client as to whether or not the trades are suitable for the client and their particular financial situation

## CONTENT & MARKETING

Knowing our Advertising and Social Media **Approval Policies**

Prior to any advertising or posting online content, submit the content for its required compliance review and approval in writing

Please note that any content you wish to post online (e.g. your social media accounts) related to your role as a Wealth Planner for Optimize must be reviewed and pre-approved in writing by compliance.

- If there is any such content, please send an email to [compliance@optimize.ca](mailto:compliance@optimize.ca) with the proposed advertising content or social media content you are looking to use and allow four to five days for compliance to review and either approve the content or require changes be made.

**Important:** Please understand that all content must be approved by compliance in writing prior to publishing. All content where registrable activity is discussed without the appropriate registrations will not be allowed.

## Permitted use of **Firm Brochures, Websites, and Marketing Content**

In any instance where you provide or a client requests to receive additional information regarding Optimize, please follow the protocols outlined below:

- If the discussion could potentially lead to registrable activities occurring, please ensure that a licensed Optimize representative conducts those discussions with the client that involve the provision of investment advice or recommendations.
- All individual pages on any outside websites must be reviewed and approved in writing by compliance. **Please note: Until you have received approval in writing by our Compliance Department on all individual web pages, outside webpages are not permitted.**
- It is not permitted to provide clients with documents which could be interpreted as solicitations for investments or conducting registrable activities (e.g. Morningstar Reports).

**Important:** As an important reminder, any discussions with clients regarding their portfolios, performance, or any other registrable activity must be conducted by a licensed Optimize representative. If you are not licensed with Optimize, you must request your assigned Associate Advising Representative or Advising Representative to conduct such discussions.

## CONFLICTS OF INTEREST

### Managing Potential **Conflicts of Interest**

#### Manage, Disclose, and Avoid potential conflicts of interest when interacting with and servicing clients

Canadian securities laws require registrants, such as Optimize, to take reasonable steps to identify existing material conflicts of interest, as well as material conflicts of interest that the registrant in its reasonable opinion would expect to arise, between the firm, including each individual acting on its behalf, and a client.

A conflict of interest includes any circumstance where:

- the interests of different parties, such as the interests of a client and those of Optimize or a representative, are inconsistent or divergent;
- Optimize or a representative may be influenced to put their interests ahead of their client's interests; or
- monetary or non-monetary benefits available to Optimize or a representative, or potential detriments to which Optimize or a representative may be subject, may compromise the trust that a reasonable client has in Optimize or a representative

If there are instances where you believe there is an explicit or implied conflict of interest between yourself and the client, please notify the compliance team immediately through [compliance@optimize.ca](mailto:compliance@optimize.ca). The team will take the necessary time to review and assess the potential conflict of interest and act accordingly. Please refer to the Policy & Procedures Manual for a full explanation of the review process to identify what constitutes potential conflicts of interest.

## VULNERABLE CLIENTS

### Helping to Identify **Vulnerable Clients**

#### Quickly identify potentially vulnerable clients to request additional oversight on their accounts

Optimize is committed to protecting the best interests and well-being of all clients, including clients who are seniors or with diminished capacity, severe long term illness, mental or physical impairment or language barriers, and may be vulnerable to potential financial exploitation, abuse or fraud (“vulnerable client”).

If there are any clients who you become aware of that may be considered a vulnerable client, please complete the submission form - Vulnerable Client Submission Form - so that additional monitoring can be completed on their accounts.

## TRUSTED CONTACT PERSON

### Helping to Identify a Client's **Trusted Contact Person (TCP)**

#### Help clients designate and identify a Trusted Contact Person should they become incapacitated or unreachable for an extended period of time

Optimize asks all clients to identify and provide the contact details for a “trusted contact”. This information will be asked to each client as part of the account opening process. If that information is not readily available when the account is being opened, it can be submitted through a service request within the portal.

A **trusted contact** is typically a reliable friend, family member or other individual who a client believes has their best interest in mind and who can speak to Optimize and its representatives about the client's health, mental capacity and financial circumstances in instances where financial exploitation, abuse or fraud is suspected or there are concerns about the client's decision-making capacity.

If you become aware of any clients who would like to identify a Trusted Contact Person, please complete the submission form - Trusted Contact Person Submission Form - so that this can be recorded in the client file. accounts.

## POLICIES AND PROCEDURES

Understanding, Reviewing, and Following our **Policies and Procedures Manual**

Regularly review and annually commit to our Policy and Procedures Manual to ensure your ongoing interactions remain compliant and client-focused

To help you and your team remain fully compliant and build your ongoing processes in line with our required policies, please take the time to regularly review and internalize our Policy and Procedures Manual.

Once a year we will ask you to confirm and commit to these policies, which helps everyone to ensure that your actions are always in line with the firm's values, mission, and our current regulatory environment. This in turn, helps to build trust with clients and contributes to them receiving the highest level of service possible.

## COMMUNICATIONS

Using your Optimize Email and Approved Signature Format **for all Communication with Clients**

Ensure that all communication with clients is done through your Optimize email address along with our pre-approved email signature format

Kindly ensure that all email communication is done so through your Optimize email address. This allows for ongoing efficient monitoring of any client communication from a compliance and legal perspective. In addition, your email signature must be in the pre-approved format and content so that it contains the necessary legal and regulatory content.

## COMPLAINTS

Follow our **Client Complaint Submission Process**

Understand and follow our Complaint Handling Process

It is important to understand how to identify a complaint along with how to appropriately handle it and when to notify the Compliance department at Head Office.

A complaint is any verbal or written statement from a client, or person acting on behalf of a Complainant, alleging a grievance or dissatisfaction with any product or service offered by Optimize or a representative of Optimize.

All Complaints are to be forwarded to [compliance@optimize.ca](mailto:compliance@optimize.ca) as soon as they are received.

Important: It is important to emphasize that once a complaint is received, please forward to Compliance immediately, please do not attempt to resolve the complaint independently, and please do not communicate with the client while compliance is reviewing the complaint.