

## OATT Standards of Conduct (SoC) Nonconformance Report

Document Number: OATT-SoC-004

Issue Date: October 2017 Last Reviewed: December 8, 2025

Revision #: 9

| Description of Non-conformance   |        |                               |  |  |  |
|--|--------|-------------------------------|--|--|--|
| [Click here and type Description of Nonconformance]                            |        |                               |  |  |  |
| Originated By  | Date   | Forward to Manager/Supervisor |  |  |  |
|  |        |                               |  |  |  |
| Corrective Action Taken to Prevent Recurrence                                  |        |                               |  |  |  |
| Manager/Supervisor:  | Title: | Date:                         |  |  |  |
| * Complete below and forward to the Chief Compliance Officer (Natasha Flynn) * |        |                               |  |  |  |
| Cause  |        |                               |  |  |  |
| [Click here and type Cause]  |        |                               |  |  |  |
| Immediate Corrective Action  |        |                               |  |  |  |
| [Click here and type Immediate Corrective Action]                              |        |                               |  |  |  |
| Long-Term Corrective Action  |        |                               |  |  |  |
| [Click here and type Long-Term Corrective Action]                              |        |                               |  |  |  |
| Follow-up of Corrective Action   |        |                               |  |  |  |
| [Click here and type Follow Up of Corrective Action]                           |        |                               |  |  |  |
| Followed up by:  | Date:  |                               |  |  |  |

1.0 Revision History



## OATT Standards of Conduct (SoC) Nonconformance Report

| Revision                   | Prepared by   | Reason for change   |
|----------------------------|---------------|---|
| October 17, 2017 – rev 1   | Dave Kelly    | Issued.   |
| October 4, 2018 – rev 2    | Nicole Mosher | Annual review   |
| September 20, 2019 – rev 3 | Nicole Mosher | Annual review, minor changes.   |
| October 15, 2020 – rev 4   | Nicole Mosher | Annual review, no changes.  |
| December 2, 2021 – rev 5   | Kelsey Settle | Annual review. Changed signing authority changed from Nicole Mosher to Natasha Flynn. |
| December 30, 2022 – rev 6  | Kelsey Settle | Annual review, no changes.  |
| December 2023 – rev 7      | Natasha Flynn | Annual review, minor changes.   |
| November 2024 – rev 8      | Natasha Flynn | Annual review, no changes.  |
| December 2025 – rev 9      | Natasha Flynn | Annual review, no changes.  |

## 2.0 Document Approver

| Position                                    | Signature     | Approval Date    |
|---|---------------|------------------|
| Chief Compliance Officer<br>(Natasha Flynn) | Pataska Thynn | December 8, 2025 |