

Our Use of Artificial Intelligence

Client Disclosure

At First Avenue Investment Counsel (“the Firm,” “we,” or “us”), we use a limited set of artificial intelligence (“AI”) tools to help our team work more efficiently and to support the quality and consistency of our services. We are providing this disclosure so that you understand how these tools are used and the steps we take to protect your information.

How we use AI tools

We use AI tools to assist with internal, administrative, and research-support tasks - for example, drafting and reviewing documents, summarizing publicly available information, organizing materials, and improving the efficiency of routine workflows. AI tools function only as productivity aids.

AI tools do not make decisions about your account. Investment decisions, suitability assessments, and any advice or recommendations are made and reviewed by our registered professionals. Any work product that involves AI assistance is reviewed by a qualified individual before it is relied upon or shared with you, consistent with our regulatory obligations as a registered firm.

How we protect your information

Protecting your personal information is core to how we operate, and our handling of personal information is governed by the *Personal Information Protection and Electronic Documents Act* (PIPEDA) and applicable privacy law. The safeguards we apply include:

- limiting the personal information that is shared with any AI tool, and avoiding the input of sensitive identifiers such as account numbers and government-issued identification;
- using AI tools under enterprise agreements that restrict how data may be used and that prohibit use of our data for model training;
- where practicable, ensuring data at rest and in transit remain within Canada;
- maintaining human oversight, so that a qualified individual reviews AI-assisted work before it is used; and
- applying our existing information-security, confidentiality, and recordkeeping controls to AI-assisted work in the same manner as our other systems.

Our continuing responsibility to you

Our use of AI does not change our duties to you. We continue to act fairly, honestly, and in good faith, and we remain fully responsible for the services we provide and the advice we give. We review our use of these tools on an ongoing basis to ensure they remain consistent with our regulatory obligations and our commitment to safeguarding your information.

Questions

If you have any questions about how we use AI tools or how we protect your information, please contact our Compliance Team at compliance@firstavenuecounsel.com.