

June 12, 2025

Ryan Morris
Partner
T: 416-947-5001
rmorris@weirfoulds.com

PRIVILEGED AND CONFIDENTIAL

Canadian Co-op Workers Federation 41 Aberdeen St #1 Kentville, NS B4N 2M9

Dear Sirs and Mesdames:

Re: Services and Housing In the Province Qualified Investment Status of Community Bonds

You have asked for our opinion concerning whether the Series A 3-year, Series B 4-year, Series C 5-year, and Series D 6-year community bonds (collectively, the "Bonds") to be issued by Services and Housing in the Province (the "Issuer") pursuant to an Offering Statement dated June 11, 2025 will be, at the time of their issuance, qualified investments for purposes of the *Income Tax Act* (Canada) ("Act") and the regulations thereto ("Regulations"), for trusts governed by registered retirement savings plans, first home savings accounts, registered retirement income funds, tax-free savings accounts, registered education savings plans, deferred profit sharing plans, and registered disability savings plans (collectively, "Registered Plans"), all as defined under the Act.

We express no opinion as to whether the Bonds will be a "prohibited investment" (within the meaning of the Act) for any particular Registered Plan.

This document is confidential and intended for the sole use of the addressee. The opinion contained herein is not intended to be, and may not be, relied upon or released to any person other than the addressee without the express written consent of WeirFoulds LLP.

Our opinion herein is based on the provisions of the Act and the Regulations as of the date hereof, proposed amendments to the Act and the Regulations announced by the Department of Finance (Canada) prior to the date hereof, applicable jurisprudence and our understanding of the current administrative practices and policies of the Canada Revenue Agency, all of which are subject to change from time to time. There is a possibility that such change(s) may be made with retroactive or retrospective effect, in which case our opinion may cease to be correct. WeirFoulds LLP assumes no responsibility to update this opinion in the event of such change(s).

4100 - 66 Wellington Street West, PO Box 35, Toronto-Dominion Centre, Toronto, Ontario, Canada. M5K 1B7

T: 416-365-1110 F: 416-365-1876



I. FACTS AND ASSUMPTIONS

In rendering our opinion herein, we have relied, without independent verification, upon the attached certificate (the "Officer's Certificate") of an officer of the Issuer dated June 12, 2025. To the extent that the statements in the Officer's Certificate are based on any assumption, are given in reliance on any other certificate or other document, or are made subject to any limitation, qualification or exception, our opinion given in reliance thereon is also based on such assumption, is given in reliance on such other certificate or other document and is subject to such limitation, qualification or exception. For greater certainty, where the Officer's Certificate affirms any past, present or future state of fact, understanding or other factor based on the belief, knowledge, awareness, understanding or expectation (or lack thereof, respectively) of the signatory, we have assumed without independent verification that such belief, knowledge, awareness or understanding (or lack thereof) is and remains fully accurate, correct and complete and that such expectation (or lack thereof) will be fully realized.

II. OPINION

Based on the foregoing Facts and Assumptions, pursuant to paragraph 4900(1)(j) of the Regulations, we are of the opinion that the Bonds will be qualified investments from the time of their issuance under paragraph (d) of the definition "qualified investment" in subsection 146(1) of the Act for trusts governed by registered retirement savings plans, paragraph (e) of the definition "qualified investment" in subsection 146.1(1) of the Act for trusts governed by registered education savings plans, paragraph (c) of the definition "qualified investment" in subsection 146.3(1) of the Act for trusts governed by registered retirement income funds, paragraph (d) of the definition "qualified investment" in subsection 146.4(1) of the Act for trusts governed by registered disability savings plans, paragraph (h) of the definition "qualified investment" in section 204 of the Act for trusts governed by deferred profit sharing plans and paragraph (c) of the definition "qualified investment" in subsection 207.01(1) of the Act for trusts governed by tax-free savings accounts and first home savings accounts.

We trust you will find the foregoing satisfactory. Please call if you have any questions or concerns.

Yours truly,

WeirFould's LLP