

Complaint Examination and Dispute Resolution Policy

1.0 Purpose of the Policy: The purpose of a complaint examination and dispute resolution policy is to set up a free and equitable procedure for dealing with complaints. It is also intended to provide oversight for the receipt of complaints, delivery of the acknowledgment of receipt, creation of the complaint file, transfer of this file to the AMF and compilation of complaints for the purpose of enabling the preparation and filing of reports twice a year to the AMF using the Complaint Reporting System (CRS).

2.0 Person In Charge: The person in charge of applying the policy, James I. Hymas, (The “Complaint Officer”) acts as the respondent with the AMF and the complainant.

This person trains the firm’s staff as necessary and provides them with the necessary information for compliance with the policy.

The Complaint Officer is also responsible for:

- Delivering an acknowledgment of receipt and notice to the complainant;
- Transferring the file to the AMF, at the complainant’s request;
- Filing a report when required with the AMF using the Complaint Reporting System (CRS),

3.0 Definition of a Complaint: For the purposes of the policy, a complaint is the expression of at least one of the following three elements:

- A reproach against the registrant;
- The identification of real or potential harm that a consumer has sustained or may sustain; or
- A request for remedial action.

4.0 Examination of Complaints: The Complaint Officer will receive each complaint and examine them in an impartial manner.

The Complaint Officer will create a file for each complaint examined. It is this file that will be sent to the AMF at the complainant’s request.

The file must contain:

- The complaint and all documents sent by the complainant;
- The Complaint Officer’s analysis of the complaint;
- Any information related to the complaint;
- The Complaint Officer’s final justified written response.

5.0 Acknowledgment of Receipt: On receipt of the complaint, the Complaint Officer will send an acknowledgment of receipt and a notice to the complainant.

The acknowledgment of receipt will contain:

- The name of the person in charge of examining complaints;
- The time required for examining the complaint;
- A copy of this Complaint Examination and Dispute Resolution Policy
- The notice to the complainant (see below)

6.0 The notice to the complainant: The purpose of this notice is to inform the complainant of the following:

- If still not satisfied with the outcome or with the examination of the complaint, the complainant may at any time, ask to have the complaint file transferred to the AMF
- Following the transfer, the AMF will examine the file and, if deemed appropriate, may offer dispute resolution services;
- The filing of a complaint with the AMF **does not interrupt the prescriptive period for civil remedies.**