



Complaint Examination and Dispute Resolution Policy for Canada

Purpose of the Policy

The purpose of this complaint examination and dispute resolution policy is to comply with the regulations of the general insurance industry, to meet the public's expectations in terms of complaint examination and to set up a free and equitable procedure for examining complaints received by BFL CANADA (hereinafter referred to as "BFL"). It is intended in particular to govern the receipt of complaints, the delivery of the acknowledgement of receipt and notices to the complainant, the creation of the complaint file, the transfer of the complaint file to the proper government councils or the General Insurance OmbudService (GIO) (www.giocanada.org), as applicable, and the compilation of complaints for the purpose of preparing and filing reports with the proper government councils, if applicable.

Procedure

Person in Charge

The person in charge of the application of the policy is Joseph Paré. In his absence, his deputy will be Sylvie Forget. The person in charge shall train the personnel and, in particular, provide the personnel with the necessary information for compliance with this policy.

As well, the person in charge shall have the following duties:

- Send an acknowledgement of receipt to the complainant;
- Send the required notices to the complainant;
- Send the file to the proper governing councils, at the complainant's request;
- Maintain a complaints register;
- File reports with the proper governing councils as applicable.

Definition of Complaint

For the purposes of the policy, a complaint exists when the dissatisfaction of a client persists even after the problem has been addressed in the course of normal business and the dissatisfaction is expressed by anyone of three circumstances:

- A reproach against BFL;
- The identification of real or potential harm that a consumer has experienced or may experience;
- A request for remedial action.

An informal step aimed at correcting a particular problem is not a complaint, insofar as the problem is dealt with as part of BFL's regular activities and without the consumer having filed a complaint.

Receipt of the Complaint

A consumer who wishes to file a complaint shall do so in writing at the following address:

BFL CANADA
2001 McGill College, Suite 2200
Montréal, Québec H3A 1G1
Telephone: 514-843-3632
Fax: 514-843-3842

An employee who receives a complaint shall immediately forward it to his Managing Vice-President and to Joseph Paré who is in charge of the application of this policy.

The Managing Vice-President investigates the dissatisfaction expressed by the client and, if the situation cannot be resolved in the normal course of business, the dissatisfaction becomes a complaint, and MUST be handled by Joseph Paré who is the person in charge of this Policy.

The person in charge of the application of the policy shall acknowledge receipt of the complaint within five (5) business days.

The acknowledgement of receipt shall contain at least the following information:

- A description of the complaint received specifying the actual or potential harm, the reproach against BFL and the request for remedial action;
- The name and contact information of the person in charge of examining the complaint;
- In the case of an incomplete complaint, a notice requesting additional information to which the complainant is asked to respond within 90 days, failing which, the complaint will be considered to have been dropped;
- A copy of the Complaint Examination Policy;
- A notice informing the complainant of his right to request the transfer of his file to the appropriate governing council or the GIO upon the expiry of the period of 90 days set for obtaining BFL's final answer, but no later than one year following his/her receipt of that answer, if he/she is dissatisfied with the outcome of the



- examination of his/her complaint or the examination itself. The notice shall also indicate that the governing councils may offer mediation if it deems it appropriate and the parties agree;
- A notice reminding the complainant that mediation is an amicable settlement process in which a third party (the mediator) intercedes with the parties to assist them in reaching a satisfactory agreement;
 - A notice informing the complainant that the filing of a complaint with the appropriate governing council or the GIO does not interrupt the statute of limitation relating to his recourses against BFL before civil courts.

Creation of the Complaint File

A separate file shall be created for each complaint.

The file shall contain the following:

- The complainant's written complaint, including the three elements of the complaint (the reproach against BFL, the real or potential harm and the remedial action requested);
- The acknowledgement of receipt including the notice;
- The outcome of the complaint examination process (the analysis and the supporting documents);
- All related correspondence;
- A copy of BFL's final written answer, containing reasons for the answer, as sent to the complainant.

Complaint Examination

The complaint shall be examined within a reasonable time period, namely within 90 days following receipt of all the information required for its examination.

After the investigation, the person in charge shall send the complainant a final answer in writing, providing the explanation of the decision.

Transfer of the File to the Appropriate Governing Councils

If the complainant is not satisfied with the result of the examination of his complaint or with the examination itself, he may ask BFL to transfer his file to their provincial insurance governing council or to the GIO.

The complainant may exercise this right only upon the expiry of the maximum time limit allowed for obtaining a final answer, but without exceeding a period of one year following receipt of this answer.



Compliance with the rules governing the protection of personal information shall remain the responsibility of BFL.

Creation and Maintenance of a Register

A complaints register shall be established for purposes of the application of the policy. The person in charge shall be responsible for keeping the register up to date.

Any complaint that falls within the definition of this term shall be recorded in the register, in particular:

- Any written complaint, regardless of the level of intervention involved in the examination of the complaint;
- Any legal proceeding contemplated in the definition of the word *complaint*;
- Any complaint submitted to the audit and ethics board, in the case of financial services cooperatives.

Reporting to the Proper Governing Councils

Within 30 days after each semester, the person in charge of the application of this Policy shall file a report with the appropriate governing councils about the complaints received, in accordance with the reporting standards required by each province and/or territory.

