

## COMPLAINT EXAMINATION POLICY

### 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 acknowledgement of receipt and creation of a complaint file.

In Québec, complaint files are transferred to the Autorité des Marchés Financiers (AMF) upon request of the complainant. Reports are filed annually to the AMF comprising all complaints filed during the year.

For complaints in other Canadian provinces, see the link below for a contact list of provincial regulators.

<https://www.cisro-ocra.com/ListofCISROmembers>

### Complaints

For the purpose of this policy, a complaint is the expression of at least one of the following 3 elements:

1. A reproach (express disapproval of, criticism of, or disappointment in someone) against the registrant by the client;
2. Identification of real or potential harm that a consumer has sustained or may sustain; or
3. Request for remedial action

Informal steps to correct a specific problem are not considered a complaint, provided the problem is resolved as part of the registrants' normal activities and the consumer has not filed a complaint.

### Receipt of the Complaint

Consumers who wish to file a complaint must do so in writing. For convenience, see the Client Complaint Form available for download at the bottom of this page. Please forward the completed form to the following address:

Registrant's name:	<b>Guy Bentley (Primary Contact)</b>	<b>Lori Bentley (Secondary Contact)</b>
Company:	The Insurance Advisory Group Inc.	The Insurance Advisory Group Inc.
Address:	510-67 Yonge Street Toronto, Ontario, Canada M5E 1J8	510-67 Yonge Street Toronto, Ontario, Canada M5E 1J8
Telephone number:	(416) 363-0072	(416) 363-0075
Fax number:	(416) 363-0060	(416) 363-0060
E-mail address:	gbentley@iagi.ca	lbentley@iagi.ca

### Complaint Resolution Contacts

As the primary contact in charge of applying this policy for the company, Victoria Reynolds will act as the respondent on behalf of the firm with Provincial Regulators, including the AMF, and also the complainant. Lori Bentley will act as secondary contact to Victoria Reynolds. Both Victoria and Lori are based in the Toronto head office of The Insurance Advisory Group Inc. (IAG).

Other duties of Complaint Resolution contacts include:

1. Delivering an acknowledgment of receipt and notice to the complainant;
2. Transferring the file to the appropriate Provincial Regulator or the AMF, at the complainant's request if required; and
3. Filing a complaints report annually with the AMF.

All employees who receive a complaint must immediately forward it to the primary contact or in lieu of them to the secondary contact. The person in charge (Primary Contact) or, in lieu, the Secondary Contact, must acknowledge receipt of the complaint **within 7 business days** of receiving it.

### Acknowledgement of Receipt to the Consumer with a Copy of the Acknowledgement sent to IAG Compliance for Review

An Acknowledgement of Receipt must contain the following information:

1. A description of the complaint, specifying the real or potential harm, the reproach against the registrant and the requested remedial action;
2. The name and contact information of the person in charge of examining complaints;
3. In the case of an incomplete complaint, a notice requesting more information to which the complainant must respond within a set deadline (**30 days**) failing which the complaint will be deemed to have been abandoned;
4. The complaint examination policy;
5. A notice\* stating that if not satisfied with the outcome or with the examination of the complaint, the complainant can request that the complaint file be transferred to the AMF or appropriate Provincial Regulator. This notice must also mention that the AMF may offer dispute resolution services, if deemed appropriate; and
6. A reminder to the complainant that filing a complaint with the AMF or other Provincial Regulator does not interrupt the prescriptive period for civil remedies against the registrant.

#### \*Sample Notice

As a complainant, if you are not satisfied with the outcome or with the examination of the complaint, at your request your file can be transferred to the Autorité des Marchés Financiers (AMF) (Québec Regulator) or other applicable Provincial Regulator. Once the file is transferred to the AMF, the regulator may offer dispute resolution services, if deemed appropriate. It should be noted that filing a complaint with the AMF does not interrupt the prescriptive period for civil remedies against the registrant.

### Creation of the Complaint File

A separate file must be created for each complaint and must contain the following:

1. The written complaint and its three elements (the reproach against the registrant, the real or potential harm and the requested remedial action). See Client Complaint Form available for download at the bottom of this page;
2. The outcome of the complaint examination process (the analysis and the supporting documents); and
3. The final written response to the complainant with justifying reasons

### **Complaint Examination**

On receiving a complaint, the registrant must initiate the complaint examination process. The complaint must be examined by IAG within 7 business days of receiving all the information necessary for the examination. After examining the complaint, IAG's primary contact must send the complainant a final response with justifying reasons.

### **Transfer of the File to Regulator**

If not satisfied with the outcome or with the examination of the complaint, the complainant may ask the registrant, at any time, to transfer the file to the AMF or other Provincial Regulator. The transferred file must include all the information related to the complaint. The AMF developed an official form for this purpose which is attached to this policy. It should be noted that the Registrant is responsible for complying with the rules governing the protection of personal information.

### **Complaint Reporting Annually (to the AMF)**

The primary or secondary contact must file a report with the AMF annually detailing the number and type of complaints received. This report must be filed regardless of whether any complaints were received, if the firm has more than one employee or representative in the province of Québec.

In May 2007, the AMF stated that if there is only one representative of the firm, that the firm is no longer required to complete a report in order to file a "no complaints" report, but instead to only report when a complaint has been received.

In November 2022, reporting periods changed to annually and the first annual reporting date is expected to be April 2023.

For more information on AMF complaint policies and procedures, please visit the AMF complaint reporting website below:

<https://lautorite.qc.ca/en/general-public/assistance-and-complaints/making-a-complaint>

**For more information about our privacy policies and procedures, please contact our Compliance Officers:**

#### **Guy Bentley, President**

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Fax: (416) 363-0060

Email: [gbentley@iagi.ca](mailto:gbentley@iagi.ca)

#### **Lori Bentley, Operations Manager**

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