

Complaints Policy

A. Definition of a Complaint

For purposes of the policy, a complaint is the expression of at least one of the following three elements, which persists after being considered and examined at the operational level:

- an allegation against the company;
- the identification of real or potential harm that a customer has sustained or may sustain; or
- a request for remedial action.

The initial expression of dissatisfaction by a customer, whether in writing or otherwise, will not be considered a complaint where the issue is settled in the company's regular course of business.

B. Receipt of a Complaint

A customer who wishes to file a complaint must do so in writing at the address listed on the company's website. An employee who receives a complaint will immediately forward the complaint to the Complaints Liaison Officer (CLO).

The CLO will acknowledge the receipt of the complaint to the party who has raised the matter, within five working days.

The acknowledgement of receipt will contain at least the following:

- a description of the complaint, specifying the real or potential harm, the allegation against the company, and the request for remedial action;
- the name and contact information of the CLO;
- in the case of an incomplete complaint, a notice requesting additional information to which the complainant must respond within 20 days, failing which the complaint will be considered to have been abandoned;
- the responsibility of the company to examine and respond to the complaint within 20 days following receipt of all the information required for its examination;
- a copy of the company's policy for approaching complaints;

- a notice reminding the complainant of the right to take a complaint to the appropriate regulatory body if dissatisfied with the outcome of the examination of the complaint or of the examination itself;
- if applicable, a notice reminding the complainant of the right to request the transfer of a complaint file to the appropriate regulatory body if dissatisfied with the outcome of the examination of the complaint or of the examination itself. The reminder will also indicate if the regulatory body offers mediation for an amicable settlement if it deems it appropriate and the parties agree; and
- a notice reminding the complainant that the filing of a complaint with a regulatory body does not interfere with recourse against the company before the courts and does not impact any prescribed time periods imposed by the courts.

C. Creation of the Complaint File

A separate file will be created for each complaint. The file will contain the following:

- the written complaint, including the three elements of the complaint (the allegation against the company, the real or potential harm, and the remedial action requested);
- the outcome of the complaint examination process (the analysis and the supporting documents); and
- a copy of the company's final written answer, containing reasons for the answer, as sent to the complainant.

The CLO will create and maintain a register of all complaints received.

D. Complaint Examination

Upon receipt of a complaint, the company will conduct an investigation. The complaint will be examined and a response provided within 20 days following receipt of all the information required for its examination.

After the investigation, the CLO will send the complainant the company's final written answer on the complaint, containing reasons for the answer. The letter will also provide the complainant with information on their right to refer the matter to the appropriate regulatory body within the applicable period of time for independent assessment.

E. Complaint to Regulatory Body



If a complainant is not satisfied with the outcome of the examination of the complaint or with the examination itself, and where the complaint relates to a contravention of *The Trust and Loan Corporations Act* (the “Act”) or *The Trust and Loan Corporations Regulations* (the “Regulations”), a complainant may file a complaint with the Consumer Credit Division of the Financial and Consumer Affairs Authority of Saskatchewan (FCAA).

The complainant may exercise this right only upon the expiry of 20-day limit allowed for receiving a final answer from the company.

Compliance with rules governing the protection of personal information remains the responsibility of the company.