



COMPLAINT EXAMINATION AND DISPUTE RESOLUTION POLICY FOR QUEBEC

Purpose of the Policy

The purpose of this policy is to set up an equitable examination procedure for all complaints received by WFGIA Insurance Agency Inc. It is intended in particular to govern the receipt of complaints, the sending of acknowledgements of receipt and notices to the complainant, the creation of complaint files, where applicable, the transfer of the complaint file to the [Autorité des marchés financiers](#) and the compiling of complaints for the purpose of preparing and filing an annual report to the AMF.

Person in Charge

All market conduct complaints should be promptly referred to WFGIA's Compliance Department (attention: Mr. Pravish Nunkoo; address: 5000 Yonge Street, Toronto, ON, M2N 7E9; telephone: 647 790 1703; email: pravish.nunkoo@transamerica.com). This policy reflects the Complaint Protocol issued by the [Autorité des marchés financiers](#), concerning the examination of complaints and the resolution of disputes.

Controlling the Complaints

The Compliance Department will ensure that this policy is properly administered and shall comply with the following procedures:

- ▶ to send an acknowledgement of receipt of the complaint to the complainant
- ▶ to send the notices required
- ▶ to send the file to the AMF, at the complainant's request
- ▶ to maintain a Central Complaint Registry
- ▶ to file an annual report with the AMF

Definition of complaint

For the purposes of this policy, a complaint is an expression of dissatisfaction which includes one of the following three elements:

- ▶ A reproach against the regulated person (i.e. the Insurer, WFGIA, agent)
- ▶ The identification of real or potential harm that a customer has experienced or may experience
- ▶ A request for remedial action

A first-level intervention consisting of a communication from a customer which is an informal step aimed at having a particular problem corrected, is not a complaint, provided that the problem is dealt with as part of the regular activities and without the customer having to request escalation of the complaint. These would include initial service and administrative issues.

Receipt of the Complaint

The Compliance Department must acknowledge receipt of the escalated 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 the regulated person and the request for remedial action.
- ▶ The name and contact information of the person responsible for examining the complaint.
- ▶ In the case of an incomplete complaint, a notice to the effect that additional Information must be sent within 10 days, failing which the complaint will be considered to have been abandoned.
- ▶ A copy of the Quebec Complaint Protocol.
- ▶ A notice informing the complainant of his right to request the transfer of his file to the AMF if he is dissatisfied with the response or the examination of his complaint. The notice shall also indicate that the AMF may offer mediation if the parties agree.

A notice reminding the complainant that mediation is an amicable conflict settlement process in which a third party (the mediator) intercedes with the parties to assist them in reaching a satisfactory agreement.

Complaint File

A separate file will be created for each complaint received. In addition, a separate complaint log will be maintained to track all complaints. The file shall contain the following:

- ▶ The complainant's written complaint, including the (3) three elements of the complaint (the reproach against WFGIA, the insurer or the agent, the real or potential harm and the remedial action requested).
- ▶ The outcome of the complaint examination process (the analysis and the supporting documents).
- ▶ A copy of the WFGIA's final response set forth in writing and containing reasons for the response.

Complaint Examination

Upon receipt of a reportable complaint, the Compliance Department shall carry out an investigation. The complaint shall be examined, and a final response provided in writing within a reasonable time period of 90 calendar days following receipt of all the required information.

Transfer of the File to the Autorité des marchés financiers

If the complainant is not satisfied with the examination of his complaint by the Compliance Department or the outcome of the examination, they may request that their complaint file be transferred to the AMF using the [Request the Transfer of a file to the AMF](#) or make the request in any other form.

Yearly Reporting

On a yearly basis, the Compliance Department will enter complaints data on AMF E-services for businesses under the "Complaint reporting" section. The Compliance Department will do so regardless of whether any complaints were received during the preceding year.

The reporting period is as follows:

- no later than May 1, for data collected between January 1 and December 31 of preceding year.

Policy update

WFGIA will review this policy every two years.

Date of last update: January 31, 2023