

## COMPLAINTS RESOLUTION PROCESS

### Customer Service Commitment

XN Financial<sup>®</sup> is committed to treating our clientele with respect. Notwithstanding our commitment to excellent customer service, on occasion someone may feel they have not been dealt with in a just and fair manner, or there may be a misunderstanding that needs to be resolved. To that end, we have implemented a Complaints Resolution Process to ensure that complaints are dealt with in a fair and timely manner. The Complaints Resolution Process provides information on how to file a complaint, how long the procedures may take, and the next steps for complaints that remain unresolved. When filing a complaint, we encourage you to follow this Complaints Resolution Process.

XN Financial<sup>®</sup> recognizes that the resolution of complaints is very important, and that our clients deserve nothing less than to have their complaints met with a consistent, fair, prompt, accurate and courteous response. Accordingly, our customers will be provided with functional mechanisms to effectively communicate their concerns, and we will employ best efforts to respond to and resolve complaints promptly, wherever possible. We understand that each of the complaints we receive, and any associated personal data that we collect, whether written or oral, must be handled in a timely, professional and confidential manner, and your complaint will be handled in accordance with any applicable requirements of the prevailing regulatory authority with jurisdiction over the complaint and the services provided. Our response to you will sufficiently address the core issues of the complaint, and where our investigation upholds your complaint, we will offer appropriate redress.

### Complaints Resolution Process

In the event that you are of the opinion that that you have been subject to, or may suffer financial loss, material distress or inconvenience, XN Financial<sup>®</sup> has a simple complaints resolution process:

#### Step One: Contact Us

Please contact us about your concern. Most problems can be resolved quickly and easily with a Customer Service Representative.

If you wish to register a complaint, you may contact us by:

- Writing to XN Financial Services (Canada) Inc., Compliance Department,  
600, De Maisonneuve Blvd. West  
Suite 2310  
Montreal, QC H3A 3J2
- By telephone, at: Toll-free in North America: 1 (866) 286-4076  
Outside North America: +(800) 9623-6837  
Call Collect: +1 (514) 843-9604
- Via email, to: [servicecenter@xn.com](mailto:servicecenter@xn.com)

### **Step Two: Speak to Management**

If your concern isn't resolved to your satisfaction, please ask to speak with a manager in that department.

### **Step Three: Escalate**

If you are still not satisfied, to request additional consideration of your problem, you may ask to have your complaint referred to the complaint handling officer in the appropriate business area. This will initiate our formal *Complaints Resolution Process*.

Our objective is to bring a resolution to your issues by close of business the next business day, whenever possible. Where this is not possible, your complaint will be acknowledged in writing within five (5) business days of our receipt of your complaint. The acknowledgement communication will include the name and title of the individual responsible for leading the internal investigation of your complaint, and a copy of this complaints procedure will be enclosed.

We will make every effort to resolve your complaint as soon as possible, and initiate an investigation at the earliest possible juncture. Every attempt will be made to provide you with our initial response to you in writing within eight (8) weeks of the receipt of your complaint. However, the response may be contained in the acknowledgement letter if the investigations have been completed within five working days of the receipt of your complaint. In the event that we require more information, we will request the required information from you and advise you that a final position letter from the company will be issued to you within 30 business days. We will review the complaint, conduct a thorough investigation, and issue a final position letter to you within thirty (30) business days. Our response will consist of clear and plain language and an explanation of any technical terms will be provided. If, for whatever reason, our initial response is not issued within thirty (30) business days of the date we received your complaint, we will issue a letter to you explaining why we have been unable to resolve your complaint and indicate when we will make further contact prior to the end of the eight (8) week period.

If you are not pleased by our response, and feel that the proposed remedial actions fail to respond to your concerns, ask us to review your complaint again, and be sure to advise us of any additional, relevant such that we may revisit the investigation of your complaint before issuing a final response. Your right as a customer to take legal action remains unaffected by the existence or use of any complaints procedures. Pursuant to the *Insurance Companies Act*, the Company has selected an independent third party, to handle complaints that are not resolved within our Complaint Handling Protocol.

### **Step Four: External Recourse**

If after following our Complaint Resolution Process, you continue to remain dissatisfied and wish to pursue your complaint, external recourse is available to you, through various consumer organizations:

If the complaint is domiciled in Quebec, we will also advise you in the final position letter that you are free to contact the Autorite Des Marches Financiers ("AMF"):

**Autorite Des Marches Financiers**

Direction de l'encadrement de l'assistance aux consommateurs  
Place de la Cite, Tour Cominar  
2640, boulevard Laurier, bureau 400  
Sainte-Foy, Quebec  
G1V 5C1

We will also advise you that if you are not satisfied with the final position provided by XN Financial<sup>®</sup>, you have the right to request that the complaint file be transferred to the AMF within one year of receipt of the final position letter. In addition, we will advise you that the AMF may offer mediation, if it deems it appropriate in the circumstances, and the parties agree. Further, you will be advised that the filing of a complaint with the AMF does not interrupt the prescription relating to his or her recourses before the civil courts.

If your complaint involves a consumer provision of the Insurance Companies Act, please feel free to contact the:

**Financial Consumer Agency of Canada**

427 Laurier Avenue West  
6th Floor  
Ottawa, Ontario  
K1R 1B9  
Telephone: Toll Free: (866) 461-3222  
Facsimile: Toll Free: (866) 814-2224