



Cabinet en assurance de dommages

Complaint Examination

Complaints Policy Statement

Your dream and ambition protector

276, St-Jacques, # 806
Montréal (Québec)
H2Y 1N3

Montréal :	514.510.6661
Rive-Sud :	450.715.6662
Télécopieur :	514.657.4245
Sans frais :	1.877.715.6661

In Context

This policy has been prepared in accordance with the new provisions introduced by the Act respecting the Agence nationale d'encadrement du secteur financier (Bill 107) with regard to the processing of complaints and the resolution of disputes.

Chapter

1

Purpose of the policy

The purpose of this policy is to institute a procedure for the equitable processing, at no charge, of all complaints received by Le Groupe AFER Ltée, hereinafter referred to as “the firm”.

It is intended in particular to provide a framework for the receipt of complaints, the sending of acknowledgements and notices to the complainant, the establishment of complaint files, the transfer of the complaint file to the Autorité des marchés financiers (hereinafter referred to as “AMF”) if applicable, and the compilation of complaints with a view to the preparation and submission of an annual report to the AMF.

ABOVE ALL, THE FIRM WANTS TO OFFER EXCELLENT SERVICE TO ITS CUSTOMERS, RESOLVE PROBLEMS QUICKLY AND EQUIP ITS QUALITY TOOLS.

Chapter

2

Person responsible

The person responsible for the application of this policy within our firm is:

Mrs. Louise Beaudet
vice-president,

She shall act as the respondent with respect to the AMF and shall ensure that all personnel receive the training and the relevant information required for compliance with this policy.

In addition to the responsibilities mentioned previously, the person responsible has the following duties:

- Acknowledge receipt of complaints to complainant;
- Sent the necessary notices to complainant;
- Forward the file to the Autorité, at the complainant's request;
- Maintain a complaints register;
- Submit an annual report to the AMF;
- To ensure that brokers and other employees of the Firm read the complaint handling and dispute resolution policy statement and that they have a copy;
- Provide a copy of this policy to all new Firm staff.

To be admissible, a complaint must be made **in writing** by the complainant. Legal proceedings instituted by the complainant are included under the category of complaints made **in writing**.

Definition of complaint

For the purpose of this policy, the written complaint must include the following three elements:

- A reproach made with regard to the firm, one of its brokers, or one of its employees;
- the identification of the potential or real harm that a consumer has suffered or could suffer;
- a claim for remedial action.

Generally, a complaint is expressed in writing and reported by letter, email, fax or in any other form that allows it to be preserved. To the extent that a consumer rather expresses his complaint by telephone or in person and that it is taken care of and processed by the person responsible for handling complaints, as designated in this policy, it must then be documented with a way that allows it to be preserved.

Thus, a first manifestation of dissatisfaction on the part of a consumer, whether written or not, does not constitute a complaint when this dissatisfaction is resolved in the normal course of the Firm's activities and without the consumer having filed a complaint. On the other hand, in the event that the consumer remains dissatisfied and his dissatisfaction must be taken care of by the Responsible Person designated in chapter 2, it is then a complaint.

You must not unduly delay referring the complaint to the Responsible Person designated in Chapter 2 for the sole purpose of

exempt from the obligation to enter the complaint in the complaints report.

We must consider that we have a complaint when the consumer's dissatisfaction persists after an attempt to resolve the dispute by our Firm.

There are several types of grounds for complaint, please see Appendix "A".

Chapter

4

Receipt of the complaint

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

Mrs. Louise Beaudet

Vice-president – Business Practice and Compliance

Le Groupe AFER Ltée

1255, rue University, bureau 920

Montréal (Québec) H3B 3W4

Phone (514) 510-6661 # 203

Toll free 1 877 715-6661 # 203

Fax (450) 715-1210

lbeaudet@groupeafer.com

A broker or an employee who receives a complaint shall immediately forward it to the person mentioned in chapter 2.

The person in charge shall acknowledge receipt of the complaint within 5 business days. The acknowledgement of receipt shall contain the following information:

- A copy of this policy;
- A description of the complaint received, specifying the reproach made with regard to the firm, its broker or its employee, and the request for remedial action;
- The name and contact information of the person in authority responsible for the processing of the complaint;
- In the case of an incomplete complaint, a notice mentioning the need to provide additional information to the person responsible within 5 working days, failing which the complaint is considered to have been cancelled;
- A notice informing the complainant of his right to request, upon the expiry of the period of (1) one month set for obtaining all necessary information, but no later than one year following the answer to the complaint, the transfer of his file to the AMF if he is dissatisfied with the outcome of the examination of his complaint or the examination itself. 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 settlement process in which a third party intercedes with the parties to assist them in reaching a satisfactory agreement;
- A reminder to the complainant that a complaint filed with the AMF does not interrupt the limitation period for lawsuits in civil courts against the firm.

Creation of the complaint file

Sur réception de la plainte

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

- the complainant's written complaint, including one of three elements of a complaint (reproach against the firm, its broker or employee; real or potential harm; and remedial action request);
- a copy of the acknowledgement of receipt sent to the complainant or request for clarification;
- the outcome of the complaint examination process (analysis and supporting documents);
- a copy of the firm's final written answer, containing reasons for the answer, as sent to the complainant;
- a copy of any document that the complainant sent the person in charge.

Upon receipt of a complaint, the manager immediately begins an investigation.

Chapter

6

Complaint Examination

Upon receipt of a complaint, the person in charge identified under chapter 2 shall conduct an investigation.

The complaint shall be examined within one month following receipt of all required information.

After the investigation, the person in charge shall send the complainant a final answer in writing, containing reasons for the decision.

Transfer of the file to the AMF

If the complainant is not satisfied with the result of the examination of his complaint or with the examination itself, he may ask the firm to transfer his file to the AMF.

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

The file transferred to the AMF shall include all the documents regarding the complaint.

Chapter

8

Creating and updating a Register

- A complaint register shall be established by the firm 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 found in s 3 shall be recorded in the register.

Semi-Annual Report

According to the law, the firm has an obligation to report complaints to the AMF twice a year.

The person in charge shall send to the AMF a report detailing the number and nature of complaints received according to the categories defined in the register twice a year, at the latest on July 30 for data collected between January 1 and June 30, and at the latest on January 31 for data collected between July 1 and December 31.

Chapter

10

Notice to Brokers and Other Employees of the Firm

The person designated as responsible under subsection 2.1 shall ensure that the brokers and other employees of the firm are informed of the policy on the processing of complaints and resolution of disputes and that they have a copy of it.

Chapter

11

Effective Date

This policy is effective as of November 1st 2006