

#### POLICY ON THE TREATMENT OF COMPLAINTS

### 1. Objective

The objective of this policy is to define and maintain a fair and equitable procedure for handling complaints at no cost to the client. It also provides an oversight framework to ensure that every complaint is handled and resolved quickly and effectively.

### 2. Complaints Officer

The Complaints Officer is Marc Maglieri, Vice-President Operations.

All client complaints must be reported immediately to the Complaints Officer, who is responsible for resolving the complaint, if possible, and reporting it to the Autorité des marchés financiers when required.

The Complaints Officer ensures that all Planiprêt employees and representatives comply with the policy and receive appropriate periodic training on its application.

# 3. What constitutes a complaint?

A complaint is the expression of one of the following three elements that could not be resolved at the operational level:

- A reproach against the company
- The identification of real or potential harm to a consumer
- A request for remedial action

An initial expression of dissatisfaction by a client, whether in writing or not, does not constitute a complaint when the dissatisfaction is resolved in the normal course of business. It becomes a complaint, however, if the dissatisfaction is not resolved and needs to be referred to the Complaints Officer.

#### 4. Complaints register

Complaints must be put in writing so they can be kept on file in Planiprêt's complaints register. If a client lodges a complaint verbally, the Complaints Officer must put it in writing so it can be kept on file.

At minimum, the complaints register must include the following information about the complaint:

- The complaint reference number assigned by Planiprêt
- A brief description of the allegations involved in the complaint, in particular the alleged harm
- The date the complaint was recorded in the register



#### Cabinet en courtage hypothécaire

- The date the acknowledgement of receipt was sent to the client
- The date the final decision was sent to the client
- The outcome of the complaint handling process
- The date the file was transferred to the Autorité des marchés financiers, where applicable
- The date the file was closed

## 5. Complaint handling process

Within 10 days of a complaint being recorded in the complaints register, Planiprêt must send the client an acknowledgement of receipt that includes, at minimum, the following information:

- The name and contact information for the person responsible for examining complaints
- A notice requesting more information (for complaints that are incomplete), which the client must respond to within a specified period of time
- A description of the complaint examination process
- A notice explaining that if the client is not satisfied with the outcome or the examination of the complaint, they can request that the file be transferred to the Autorité des marchés financiers
- A reminder to the client that transferring a complaint to the Autorité des marchés financiers does not interrupt the time limit for civil remedies

Employees and representatives are prohibited from signing a settlement agreement directly with a client or paying them compensation or restitution.

A file must be created for each complaint and must include all the pertinent information, including:

- The complaint itself and all documents sent by the complainant
- The analysis of the complaint
- All information related to the complaint
- The final response and justification, in writing

The Complaints Officer must examine and document every complaint received by Planiprêt and submit a recommendation to Gilles Bouillon, Chief Executive Officer. Once the recommendation has been approved, the Complaints Officer must present the final response in a letter that includes a description of the complaint, the outcome of the internal examination and the justification for Planiprêt's final decision. In addition, it must describe the process for sending the complaint file to the Autorité des marchés financiers if the client is not satisfied with the handling of the complaint. The final response must be sent to the client within 90 days of the complaint being recorded in the complaints register.

### *If the client accepts the proposed solution*

If the client and Planiprêt reach a settlement through the Complaints Officer, the client must sign a release in favour of Planiprêt.



# If the client does not accept the proposed solution

Clients who are not satisfied with the outcome of Planiprêt's examination of the complaint may ask Planiprêt to send a copy of their file and the written complaint directly to the Autorité des marchés financiers.

## 6. Report to the Autorité des marchés financiers

In accordance with applicable regulations, the Complaints Officer must send a report to the Autorité des marchés financiers, twice a year, of all client complaints received by Planiprêt. The reporting periods are from January 1 to June 30 and from July 1 to December 31 of each year. The reports must be submitted through the Complaint Reporting System (CRS) no later than July 30 and January 30, respectively.