

Complaint Handling Policy

1. The goal of the Policy

The goal of this policy is to establish and maintain a fair and consistent process for the handling of complaints which is free of charge. It also aims to ensure oversight into the complaint handling process so that each complaint is addressed promptly and resolved effectively, while contributing to the continuous improvement of services.

1A. Compliance guidelines

The applicable regulations require Planiprêt to ensure that clients can obtain information at any time regarding the handling of their complaint. Furthermore, Planiprêt must draft all informational documents related to complaint handling and dispute resolution in a clear and non-misleading manner, to highlight the essential elements needed for an informed decision using a clear and simple language all while being precise and must also assist the plaintiff to formulate the complaint to ensure that Planiprêt fully understand its scope. If the complaint has implications for other clients, Planiprêt must also address those.

Planiprêt must communicate with the plaintiff in a clear and simple language and assist them in formulating their complaint in a way that allows Planiprêt to fully understand its scope. If the complaint has implications for other clients, Planiprêt must also address those.

Complaints must be assigned to staff members under the supervision of the individual responsible for complaint handling and who possess the necessary competencies for this task.

The person responsible for complaint handling must aim to develop an overall view of the complaints received by identifying common causes and the issues that are being raised.

Finally, periodic reporting must be provided to Planiprêt leadership covering the following:

- The number of complaints received and processed, along with their common causes.
- The verdict of the complaints
- Issues related to implementation, dissemination, and compliance with the policy.
- Issues raised by the identification of common causes among the complaints handled.

2. Complaint Handling Officer

The person responsible for handling complaints is the Broker of Record, Mr. Gilles Bouillon, or any other individual to whom he may delegate this responsibility from time to time.

**A final response is expected when the client explicitly or implicitly expects that measures will be taken to address the complaint.*

Any complaint submitted by a client must be immediately reported to the complaint handling officer, who is responsible for resolving it, if possible, and for reporting it to the **Autorité des marchés financiers (AMF)** when required.

The complaint handling officer ensures that this process is implemented and followed by Planiprêt, its employees, and its representatives, and that adequate training is provided periodically on the subject.

3. What Constitutes a Complaint?

A complaint is the statement of one of the following three elements, which cannot be resolved in the normal course of Planiprêt operations:

- Criticism or dissatisfaction expressed by a client regarding a product or service of the company, for which a final response is expected.
- The reporting of potential or actual damage that a consumer has suffered or could potentially suffer.
- A request for corrective measures
- Any request to correct a calculation or clerical mistake that requires further action to fix its impact on the person making the request or others in their client group.

However, the following do not constitute a complaint (unless accompanied by one of the three elements mentioned above):

- A request for information or documents regarding a product or service offered.
- A request for access to or correction of personal information made in accordance with the *Act Respecting the Protection of Personal Information in the Private Sector* (chapter P-39.1);
- A request for compensation or any other insurance claim.
- A request to correct a calculation or clerical error.
- Sharing comments or feedback.

4. Client complaint registry

A complaint must be promptly recorded in writing, in a manner that allows it to be retained, in Planiprêt complaint log. Therefore, if a client expresses a complaint verbally, the complaint handling officer must ensure it is documented in writing so it can be properly retained.

The complaint log must be kept up to date and must include at a minimum the following information about the complaint:

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- The complaint reference number assigned by Planiprêt and the date it was received.
- A brief description of the allegations in the complaint, including the issue they experienced
- The date of the complaint was entered into the log.
- A copy of the acknowledgment of receipt sent to the client.
- The date on which the acknowledgment of receipt was sent to the client.
- A copy of the documents and information used to analyze the complaint.
- A copy of communications exchanged between Planiprêt and the client regarding the complaint.
- A copy of any settlement offer submitted to the client.
- A copy of the final decision sent to the client, within normal timeframes or under exceptional circumstances.
- The date on which the final decision was sent to the client.
- The outcome of the complaint handling process.
- The date on which the file was forwarded to the Autorité des marchés financiers, if applicable.
- The date on which the file was closed.

The complaint file is kept in the client complaint registry and must be retained for the same length of time as the client's file, that is, for at least 7 years from the date the document was received."

5. Complaint Handling Process

This policy aims to properly support the client throughout the complaint handling process and to inform them, in a timely manner, of the status of their complaint.

Planiprêt is required to address each complaint with due diligence and must therefore:

- Properly document the complaint file and create a record.
- Record the complaint in the complaint log and keep it up to date.
- Send the required acknowledgment of receipt to the plaintiff.
- Provide the plaintiff with a final response within the timeframes outlined below.

Within 10 days of receiving a complaint, Planiprêt must send the client an acknowledgment receipt that includes, at a minimum, the following information:

- The complaint reference number assigned by Planiprêt.
- The date the complaint was received, if earlier than its entry in the registry
- The name and contact information of the person responsible for reviewing complaints.
- The means by which the client can obtain information about the status of their complaint.

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- A notice stating that if the client is not satisfied with the outcome or the review of the complaint, they may request that the complaint file be forwarded to the Autorité des marchés financiers.
- The anticipated time limit for processing the complaint.
- A hyperlink to a summary or a copy of this policy.
- A notice stating that if the client is not satisfied with the outcome or the review of the complaint, they may request that the complaint file be forwarded to the Autorité des marchés financiers.

It is prohibited for a representative or employee to reach a settlement directly with a client, to pay compensation, or to make a restitution. However, a member of the Planiprêt staff designated for this purpose by the person responsible for complaint handling may negotiate with the plaintiff the terms of a settlement offer that may be acceptable to Planiprêt.

A file must be created for each complaint and include all information related to the complaint, namely:

- the complaint itself and all documents submitted by the plaintiff in relation to it.
- a copy of the acknowledgment of receipt described in Article 5.
- any document or information used in the analysis of the complaint.
- the rational conclusion of the complaint after analysis and the outcome of its handling.
- If applicable, following a settlement offer made to the plaintiff, a copy of the acceptance of the offer or the request for dispute resolution services.
- A notice provided to the plaintiff explaining unforeseen circumstances delaying the final response and a new date for the postponed response.
- The final response sent to the plaintiff and the justification, recorded in writing.

If Planiprêt finds that a received complaint involves other parties, intermediaries, or credit agents (such as Planiprêt service providers), and if the third parties are agents of Planiprêt, the company will be responsible for filing the complaint against those third parties. If the plaintiff has a direct relationship with the third party, Planiprêt must provide the plaintiff with the information it holds to support the complaint the plaintiff will file against that third party.

Mr. Gilles Bouillon, as the person responsible for complaint handling (or another person to whom Mr. Bouillon may delegate this responsibility from time to time), reviews and documents each complaint received by Planiprêt. If appropriate, he may choose a simplified approach to resolve the complaint within 20 days of its receipt.

This approach involves delegating the handling of the complaint to a qualified staff member, even if that person is not directly under his supervision, too:

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- conduct verbal or written exchanges with the plaintiff following the analysis of the complaint, with the goal of reaching a settlement.
- inform the plaintiff, at the conclusion of these changes:
 - of the reasoned conclusion resulting from the plaintiff analysis.
 - and, if applicable, of the conditions and timelines associated with a settlement offer.

If the complaint is not resolved within this 20-day period, Mr. Bouillon, or a staff member acting under his supervision, must send the plaintiff a written **final response**, which includes:

- a statement that it is a final response
- An objective summary of the complaint.
- The reasoned conclusion of the analysis conducted and the outcome of the handling.
- A reminder of the plaintiff's right to request a review of their file by the Autorité des marchés financiers, along with the necessary instructions on how to proceed.
- The terms are applicable to any proposed settlement offer (including the acceptance deadline).
- The professional contact information and signature of the person who handled the complaint.

This final response must be sent to the plaintiff as soon as possible, no later than 60 days following receipt of the complaint, or within a maximum of 90 days in exceptional circumstances, in which case the reasons for the delay must be clearly explained to the plaintiff.

Client Acceptance of the Proposed Solution

Planiprêt must allow the plaintiff a reasonable period to evaluate the proposed settlement offer and seek advice to make an informed decision.

When the client and Planiprêt, through the complaint handling officer, reach a settlement, the client will be invited to sign a release in favor of Planiprêt.

Planiprêt must then follow through with the agreement within 30 days of the offer's acceptance, or within any other agreed-upon timeframe.

Client Refusal of the Proposed Solution

If the client is dissatisfied with the outcome of Planiprêt review of their complaint, Planiprêt must, within 20 days of receiving the complaint, send the plaintiff a written notice including the

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information typically found in an acknowledgment of receipt, including the right to request a review of the complaint file by the Autorité.

Planiprêt must, within 15 days of the plaintiff's request, forward the complaint file to the Autorité for review.

Prohibitions

Planiprêt may not:

- Attach any condition to a settlement offer that:
 - Prevents the plaintiff from exercising their right to have their complaint reviewed by the Autorité.
 - Requires the plaintiff to withdraw any other complaint they have filed.
 - Prevent the plaintiff from communicating with the Autorité or any other competent authority.In any public representation, describe its complaint handling service as an “ombudsman” or claim that it is an independent entity.

7. Summary of the Policy on the Website

A summary of Planiprêt complaint handling and dispute resolution policy must be available on its website in a way that is easily accessible by its clients. This summary must include the following information:

- A description of the procedure for submitting a complaint and the possibility of the plaintiff to be assisted in communicating it.
- A description of the steps involved in handling complaints.
- A statement that the complaint may be submitted using the complaint form available on the Autorité's website, with a reference or link to the form.
- The means by which information on the complaint handling process can be obtained.
- The various prescribed timeframes for handling complaints; and
- A statement of the plaintiff right to have their complaint reviewed by the Autorité if they are not satisfied with Planiprêt final response.

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