



Complaint Examination and Dispute Resolution Policy

This policy complies with the provisions set by the *Act respecting the Agence nationale d'encadrement du secteur financier* (Bill 107) pertaining to complaint examination and dispute resolution.

1. Purpose of the policy

The purpose of this policy is to set up a free and fair procedure for examining all complaints received by Dale Parizeau Morris Mackenzie Inc., hereinafter referred to as the “firm”. It is intended in particular to govern the receipt of complaints, the delivery of the acknowledgement of receipt and notices to the complainant, the creation of the complaint file, the transfer of the file to the *Autorité des marchés financiers* (hereinafter referred to as the “AMF”) if applicable, and the compilation of complaints for the purpose of preparing and filing a semi-annual report with the AMF.

2. Person in charge

2.1 The person in charge of the application of the policy within our firm is: Christian N. Dumais, Vice President, General Counsel.

2.2 As the person in charge of the application of the policy, the person identified under paragraph 2.1 shall also act as the representative with respect to the AMF. He shall train the personnel and, in particular, provide the personnel with the necessary information for compliance with this policy.

2.3 As well, the person in charge shall have the following duties:

- a. send an acknowledgement of receipt to the complainant in compliance with paragraph 4.3;
- b. send the required notices: see clause 4.3 e);
- c. send the file to the AMF, at the complainant’s request: see section 7;
- d. keep a complaint register up to date: see section 8;
- e. file a semi-annual report with the AMF: see section 9.

3. Complaint

3.1 For the purposes of the policy, a complaint is the expression of at least one of the following three elements:

- a. a reproach against the firm, one of its brokers or one of its employees;
- b. the identification of real or potential harm that a consumer has experienced or may experience;
- c. a request for remedial action.

- 3.2 Any first level intervention consisting of a consumer communication, and which is an **informal step** aimed at correcting a particular problem is not a complaint, insofar as the problem is dealt with as part of the regular operations and without the consumer having filed a complaint.

4. Receipt of the complaint

- 4.1 A consumer who wishes to file a complaint shall do so in writing at one of the following addresses or by email at complaint@dpmm.ca:

Montreal

3400 De Maisonneuve Boulevard West
Suite 700
Montreal, QC H3Z 3B8

Quebec City

900 René-Lévesque Boulevard East
Suite 700
Quebec, QC G1R 2B5

Gatineau

745 Saint-Joseph Boulevard
Gatineau, QC J8Y 4B7

Jonquière

3885 Harvey Boulevard
Suite 203
Jonquière, QC G7X 9B1

- 4.2 A broker or an employee who receives a complaint shall immediately forward it to his immediate supervisor or to the person in charge of the application of this policy (see paragraph 2.1).
- 4.3 The person in charge shall acknowledge receipt of the complaint within five business days. The acknowledgement of receipt shall contain at least the following information:
- a copy of this policy;
 - a description of the complaint received specifying the reproach against the firm, its broker or employee, and the request for remedial action;
 - the name and contact information of the person in charge of examining the complaint;
 - in the case of an incomplete complaint, a notice requesting additional information to which the complainant must respond within five business days, failing which the complaint will be considered to have been abandoned;
 - a notice informing the complainant of his right to request, upon the expiry of the period of 15 business days set for obtaining the regulated person's final answer, but no later than one year following his receipt of that answer, 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 it deems it appropriate and the parties agree;



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

5. Creation of the complaint file

- 5.1 A separate file shall be created for each complaint.
- 5.2 The file shall contain the following:
 - a. 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 requested);
 - b. the outcome of the complaint examination process (analysis and supporting documents);
 - c. a copy of the firm's final written answer, containing reasons for the answer, as sent to the complainant.

6. Complaint examination

- 6.1 Upon receipt of a complaint, the person identified under paragraph 4.2 shall conduct an investigation.
- 6.2 The complaint shall be examined within 15 business days following receipt of all required information.
- 6.3 After the investigation, the person in charge shall send the complainant a final answer in writing, containing reasons for the answer.

7. Transfer of the file to the AMF

- 7.1 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.
- 7.2 The complainant may exercise this right only upon the expiry of the maximum time limit of 15 business days allowed for obtaining a final answer, but without exceeding a period of one year following receipt of this answer.
- 7.3 The transferred file shall include all the documents regarding the complaint.

8. Creating and updating a register

- 8.1 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 (paragraph 2.1).
- 8.2 Any complaint that falls within the definition found in section 3 shall be recorded in the register.

9. Semi-annual report

Within two months after December 31 and June 30 of each year, the person in charge shall file a report with the AMF indicating the number and nature of complaints received in the last six months, according to categories set forth in the register.



10. Notice to brokers and other employees of the firm

The person in charge as per paragraph 2.1 sees that brokers and other employees of the firm become aware and have a copy of the Complaint Examination and Dispute Resolution Policy.

11. Effective date

This policy is effective as of April 1, 2004.

Last update: July 2011