



OM FINANCIAL COMPLAINT HANDLING PROCESS:

In the event that a client complaint is received the following procedures should be followed:

1. Upon receipt of a client complaint either verbally or in writing, complete a complaint report (below) including all relevant details.
2. If the complaint is received in writing, the client should be contacted within 3 business days to acknowledge receipt of the complaint.
3. If the complaint deals with a life insurance or segregated fund product, the Compliance Officer of the affected insurance carrier should be notified.
4. The Broker should be contacted as soon as possible for an explanation and any required documentation.
5. One copy of the report should be maintained in a Complaint File retained by the Compliance Officer and a copy sent to (OM Financial principle)
6. Upon resolution, the Complaint Report should be updated with the final agreed upon solution and an updated copy forwarded to (OM Financial principle) to close the file.

COMPLAINTS MANAGEMENT

If you are a Producer in Quebec or hold a licence in Quebec, there are certain requirements to which you must adhere, including the establishment of a complaints protocol. You must be aware of these requirements.

You are required by CAILBA Producer Code of Conduct to maintain a Complaint log that includes:

- Customer name
- Policy or document number
- Producer name
- Date of complaint, (written or verbal)
- Recipient of complaint
- Individual handling the complaint
- Summary of complaint (details should include whether a regulatory body is involved.)
- Whether the complaint was reported to the insurer and/or MGA and the contact information.
- Steps towards resolution
- Statement of resolution and date of resolution.

It is vitally important that you keep this log in good order. It is a protection for your business. You may be called upon to produce the complaint log in regulatory and insurer audits.

1049 McNicoll Avenue Toronto ON M1W 3W6. Tel: (416)491-7727 Fax: (416)491-7102

www.omfinancial.com



OM FINANCIAL INC.

A Company With a ♥!

COMPLAINT INVESTIGATION LOG

Person taking the call: _____

Complaint Details:

Client Details:

Is this the first Complaint? If no, how many complaints have been received for this advisor?

Name of Insurance Company:

Policy Details:

Allegations:

Representative Comments:

Date: _____

Client Telephone Interview Details:

MGA Comments:



RESPONDING TO INSURANCE COMPANY REQUESTS

Many insurers' contracts require us to cooperate and be responsive to requests for information. Contracts also generally call for cooperation and assistance in responding to complaints or investigations into business practices or conduct. Insurers typically expect to be provided access to our records related to all matters governed by the contract. Failure to cooperate can be grounds for contract termination and in some cases, reports to regulators.

REGULATORY AUDITS AND INQUIRIES AND LEGAL PROCEEDINGS

Some insurers' contracts require us to notify them of any interactions we have with regulators, in particular any enforcement actions or legal proceedings. It is critically important that we notify our errors and omissions insurance carrier as well. Depending on the nature of the audit, inquiry or proceeding, we reserve the right to contact our legal counsel for direction and assistance.

MEMBERSHIPS IN PROFESSIONAL ASSOCIATIONS

The concept of "independent producer" is virtually unheard of in the other financial services and participants from rules-based regimes tend to look askance at the structure of distribution in the life insurance business. At the same time, there is no evidence that the end consumer is less protected or less well-served in our sector. However, independence comes with some strict obligations, including development of your own AML, privacy and market conduct programs, policies and procedures.

Membership in a professional association has other distinct advantages. Professional organizations strive to make information about regulatory and legislative changes available to members, in part to keep them current and in part to ensure that members have an opportunity to weigh in on matters that concern them. Associations exist to protect and advance their members' interests. They also offer continuing education, networking opportunities and professional development. If you are not currently a member of an association, it is wise to investigate your choices and give thought to joining.