

**PRIMERICA CANADA  
COMPLAINT EXAMINATION AND DISPUTE RESOLUTION POLICY  
FOR QUEBEC**

**Purpose of the Policy**

The purpose of this Complaint Examination and Dispute Resolution Policy (the "Policy") is to comply with the regulations relating to complaint handling, to meet the public's expectations in terms of complaint examination and to set up a free and equitable procedure for examining complaints received by Primerica Canada. For the purposes of this Policy, references to Primerica Canada shall include Primerica Life Insurance Company of Canada, PFSL Investments Canada Ltd., PFSL Fund Management Ltd., Primerica Financial Services (Canada) Ltd., Primerica Financial Services Ltd. and Primerica Client Services Inc.

This Policy 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 complaint file to the *Autorité des marchés financiers* (the "AMF") and the compilation of complaints for the purpose of preparing and filing a report twice a year with the AMF using the Complaint Reporting System ("CRS").

**Person in Charge**

**The person in charge of applying the policy is Mr. Richard Martin.** In his absence, his deputy will be Mrs. Olivia Zarate. Mr. Richard Martin or his deputy shall act as the respondent with the AMF and the complainant, and shall create and maintain a register of all complaints received.

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

- Arrange for an acknowledgement of receipt to be sent to the complainant;
- Arrange for the transfer of the file to the AMF, at the complainant's request; and
- file a report twice a year with the AMF, using the CRS.

**Contact Information**

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**Definition of Complaint**

**For the purposes of this Policy**, a complaint is the expression of at least one of the following three elements:

- a reproach against a Primerica Canada entity;
- the identification of real or potential harm that a client has sustained or may sustain; and
- a request for remedial action.

Any informal step aimed at correcting a particular problem is not a complaint, insofar as the problem is settled as part of Primerica Canada's regular activities and without the filing of a complaint by the client.

**Receipt of the Complaint**

**A client who wishes to file a complaint** shall do so in writing to the following:

**Primerica Canada**  
6985 Financial Drive  
Suite 400 Mississauga,  
ON L5N 0G3

Telephone: (905) 812-2900  
Fax: (905) 813-5314  
Email: [plicc\\_cn@primerica.com](mailto:plicc_cn@primerica.com)  
(if complaint relates to life insurance or segregated funds)  
Email: [pfsl.inquiries@primerica.com](mailto:pfsl.inquiries@primerica.com)  
(if complaint relates to mutual funds)

**Attention: Field Management Department**

The person in charge of the application of this Policy or his deputy shall arrange for receipt of the complaint to be acknowledged in writing within five (5) business days.

The acknowledgement of receipt shall contain at least the following information:

- a description of the complaint specifying the real or potential harm, the reproach against Primerica Canada and which remedial action is requested;

- the name and contact information of the person in charge of examining complaints;
- in the case of an incomplete complaint, a notice requesting additional information to which the complainant must respond within 30 days, failing which, the complaint will be considered to have been abandoned;
- a notice informing the complainant of his/her right to request the transfer of his/her file to the AMF if he/she is dissatisfied with the outcome of the examination of his/her complaint or the examination itself. The reminder shall also indicate that the AMF may offer dispute resolution services if deemed appropriate;
- a notice reminding the complainant that the filing of a complaint with the AMF does not interrupt the prescription relating to recourses against Primerica Canada before the civil courts; and
- a copy of this Policy.

### **Creation of the Complaint File**

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

- the written complaint, including the three elements of the complaint (the reproach against Primerica Canada, the real or potential harm and the remedial action requested);
- the outcome of the complaint examination process (the analysis and the supporting documents); and
- a copy of Primerica Canada's final written answer, explaining the decision, as sent to the complainant.

### **Complaint Examination**

Upon receipt of a complaint, **Primerica Canada shall initiate an investigation.**

The complaint shall be examined within a reasonable time period, namely within **90** days following receipt of all the information required for its examination unless the complexity of the complaint warrants additional time for its review.

After the investigation, the person in charge shall arrange for a final answer providing the explanation of the decision to be sent in writing to the complainant.

### **Transfer of the File to the AMF**

If the **complainant is not satisfied** with the result of outcome of the examination of his/her complaint or with the examination itself, he/she may ask Primerica Canada at any time to transfer his/her file to the AMF.

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

Compliance with the rules governing the protection of personal information shall remain the responsibility of Primerica Canada.

### **Bi-annual Report**

**Twice a year**, the person in charge shall file a report with the AMF indicating number and nature of complaints received and do so via CRS, whether or not complaints were received.

The reporting periods are:

- no later than July 30<sup>th</sup>, for data collected between January 1<sup>st</sup> and June 30<sup>th</sup>;
- no later than January 30<sup>th</sup>, for data collected between July 1<sup>st</sup> and December 31<sup>st</sup>.

### **Effective Date**

This Policy is effective July 16, 2012.

This Policy has been revised on January 29, 2020

**FOR QUESTIONS ABOUT THE EXAMINATION OF COMPLAINTS, CONTACT THE AMF INFORMATION CENTRE:**

Québec: 418-525-0337  
 Montréal: 514-395-0337  
 Toll Free: 1-877-525-0337  
 Fax: 1-877-285-4378  
 E-mail: [information@lautorite.gc.ca](mailto:information@lautorite.gc.ca)