

COMPLAINT HANDLING POLICY - MORTGAGE BROKERAGE

1) Goal of the policy

The objective of our complaint policy is to ensure that all received complaints be treated equally and without delay in order to deliver a satisfactory solution to the plaintiff. It also aims to ensure that all complaints be indexed and analyzed for us to be able to bring the necessary corrections, in view of our client's satisfaction.

2) Complaint process responsibility

M. Jean Luc Binette, having its main office at 500 Place d'Armes, suite #1500, Montréal, Qc, H2Y 2W2, is responsible for the processing of complaints. He can be reached by email at JLBinette@alfid.com or by phone at (514) 282-7654. All complaints will be submitted to him for review and to be solved, and to signal them to the *Autorité des marchés financiers* (AMF), if necessary.

3) Definition – what constitutes a complaint:

A complaint results of 3 factors:

- A reproach or grievance towards the company or one of its representatives
- An assault or a potential or real harm towards a client
- A corrective measure linked to the inadequate treatment of a file

Not all manifestations of dissatisfaction, written or verbal, of a client and/or a consumer treatment in the normal context of the Cabinet's activities, will be classified as a complaint. However, if a client or a consumer remains dissatisfied and that its dissatisfaction must be treated by the responsible of the processing of complaints, then the file will be treated as a complaint.

4) Complaints register

Jean Luc Binette, Responsible of complaints, must log all complaints (written or verbal) in the complaints register created for this purpose et must conserve all related documentation.

In the case of a verbal complaint, the responsible of complaints must document it for it to be put into writing and added to the complaints register.

The complaints register must contain the following information:

- Reference number of the complaint;
- Identification of the plaintiff;
- Brief description of the declarations contained in the complaint, including the harm ;alleged et the corrective measure requested;
- Date that the complaint was added to the register;
- Date that the receipt confirmation was sent to the plaintiff;
- Date that the companies' final position is transmitted to the client;
- Result of the treatment of the complaint;
- Date that the file is transferred to the AMF, if applicable;
- Date of closure of the file;

5) Treatment of complaints procedure

In the 10 days from the moment the complaint is logged in the register, Jean Luc Binette must transmit to the client/consumer an acknowledgment of receipt, containing, at a minimum, the following:

- A description of the complaint detailing the harm suffered or potential, the reproached occurrences, and the requested corrective measure;
- The name and contact information of the person responsible of the review of complaints;
- In the case of an incomplete complaint, a notice requesting more information that the client/consumer must respond to in a predefined delay;
- The process of review of the complaints, included notably the delay of treatment that the client/consumer should expect;
- A notice indicating that if the client /consumer is not satisfied of the result or review of the complaint, it can request that the complaint file be transferred to the Autorité des marchés financiers;
- A reminder to the client/consumer that the transfer of a complaint to the Autorité des marchés financiers does not disrupt the delay of civil appeals. In the case of a complaint file transfer, the representative must ensure to respect the rules concerning the protection of personal information.

It is formally banned for a representative or employee to complete a file by amicable agreement, to pay a compensation or to make a restitution.

For every complaint, a file must be created and include all the information elements related to the complaint, being:

- The complaint and all the documents transmitted by the plaintiff;
- All the information in relation to the complaint and its treatment, included the documents used to review the complaint;
- The result of the treatment process and the final response explained and documented in writing;

Once the file treated, the Responsible of complaints must present the final result in a letter that will include:

- o a description of the complaint;
- o the results of the internal review;
- o the justification of the final decision;
- o the transmission process to the Autorité des marchés financiers if the client/consumer is dissatisfied with the treatment of the complaint;

The final observation must be sent to the client in a maximum delay of 90 days of the moment the complaint was added to the register.

Acceptance by the client of the proposed solution

Once the client and Jean Luc Binette reach an agreement, the client must imperatively sign a release in favor of the Cabinet.

Refusal of the proposed solution

If the client/consumer does not adhere to the proposed solution by the Responsible of complaints, it may request to have the complaint sent directly to the Autorité des marchés financiers a copy of its file and of the written complaint.

6) Report to the Autorité des marchés financiers

According to the applicable regulation, the Responsible of the treatment of complaints must declare to the Autorité des marchés financiers, twice yearly, the complaints received by clients. The declaration periods are from January 1st to June 30th and July 1st to December 31st of every year. The reports must be deposited using the Complaints Declaration system (SRP) at the latest July 30th and January 30th, respectively.

7) Other provisions

A review of the complaint treatment policy must be done on an annual basis by the Responsible of the treatment of complaints, who will conserve a review document indicating the modifications made, including the justifications for such changes.

If the review is outsourced, the recommendations reported must be included to the policy.

The present policy is in effect as of July 1st, 2021.