

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 an annual report with the AMF using their E-Services.

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:**

- When necessary, arrange for the provision of assistance to the complainant in filing their complaint;
- Arrange for the complaint to be assigned to an investigator for analysis;
- Record the complaint in the firm's complaint register within five (5) working days following receipt of the complaint;
- Arrange for an acknowledgement of receipt to be sent to the complainant within five (10) working days following receipt of the complaint;
- Arrange for the substantive response to be sent to the complainant using plain and clear language no later than 60 calendar days following reception of the complaint;
- Manage any further exchange in communication with the complainant to, in particular, allow the complainant to submit new relevant facts, if any, and respond to the complainant's inquiries including the status of the complaint;
- Arrange for the transfer of the file to the AMF, at the complainant's request; and file a report yearly with the AMF, using the AMF E-Services.

Definition of Complaint

For the purposes of this Policy, a complaint means any reproach or dissatisfaction in respect of a service or product offered by Primerica companies where the reproach or dissatisfaction is communicated by a person who is a member of the clientele of Primerica companies and a final response is expected. A request for information or materials regarding a product or service, a request for access or rectification of information contained in our records, a claim for indemnity or any other insurance claim, a request for correction of a clerical error or mistake in calculation, or the communication of a comment or feedback are not considered complaints.

Receipt of the Complaint

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

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

Attention: Field Management Department

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

A client can also submit a complaint using the Form available on the AMF web site by following this link:
<https://lautorite.qc.ca/en/general-public/assistance-and-complaints>

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 ten (10) 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 date at which the complaint was received and recorded in the Complaints Register;
- the complaint identifying code;
- the means by which the complainant can obtain information about the status of the complaint;
- the anticipated timeframe for the complaint handling process to be completed;
- the name and contact information of the person in charge of examining complaints;
- 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 or a hyperlink to it.

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 main elements of the complaint which are the reproach against a Primerica company, or a representative, the real or potential harm and the remedial action requested;
- the acknowledgement letter;
- the outcome of the complaint examination process (the analysis and the supporting documents); and
- a copy of our substantive response as sent to the complainant. Our substantive response will contain, amongst other things, a summary of the complaint received, the conclusion of our analysis, including the reasons for that conclusion, the outcome of the complaint process, and a statement to the effect this is our final response.

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 **60** days following receipt of the complaint unless exceptional circumstances, including complexity of the matter under review i.e. taxation, delay in providing supporting documentation, etc. warrant additional time for its review. In those instances, no later than the 60th day of the complaint handling process, you will be informed in writing that our examination of the complaint could take up to 90 days following reception of the complaint and you will be informed of the anticipated date at which the final decision will be rendered. After the investigation, the person in charge shall arrange for a final position providing the explanation of the decision to be sent in writing to the complainant.

Should an offer be made relative to the complaint, it will be indicated in our substantive response and the complainant will be given reasonable time (within 30 calendar days) to evaluate that offer and respond to it. If accepted, we will follow through with the offer within 30 days following the acceptance of the offer unless an extension is necessary and agreed upon with the complainant.

Should the complainant require assistance during the processing of the complaint, the investigator assigned to the case as indicated in our correspondences with the complainant or the persons mentioned below can be contacted. Conversely, we will contact the complainant should we require further clarifications, update the complainant on the status of the complaint process as required, or advise the complainant should we require additional time.

Contact Information

Richard Martin
Telephone: (450) 975-2400 Ext. 4185
Email: Richard.Martin@primerica.com

Olivia Zarate
Telephone: (905) 369-8045
Email: Olivia.Zarate@primerica.com

Transfer of the File to the AMF

If the **complainant is not satisfied** with the result or 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. A statement to that effect will be included in our substantive response to the complainant.

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.

Annual Report

Since November 7, 2022, the process for recording and reporting complaints has been harmonized for the entire industry. Each year, no later than May 1st, the person responsible must file a report with the Autorité, using their Online services, in which the number and nature of complaints received must be recorded and whether complaints were received or not.

Effective Date

This Policy is effective July 16, 2012.

This Policy has been revised on June 6, 2025

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.qc.ca