

# IDC WIN Quebec Complaint Examination and Dispute Resolution Policy

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## Purpose of the Policy

The purpose of this policy is to set up a free and equitable procedure for dealing with complaints. It is also intended to provide oversight for the receipt of complaints, delivery of the acknowledgment of receipt, creation of the complaint file, transfer of this file to the AMF and compilation of complaints for the purpose of preparing and filing reports twice a year to the AMF using the Complaint Reporting System (CRS).

### **Person(s) in Charge: Adrien Legault**

Adrien Legault is the person in charge of applying this policy. The person in charge acts as the respondent with the AMF and the complainant. They train the firm's staff (as required) and provide them with the necessary information for compliance with the policy. They are also responsible for:

- Delivering an acknowledgment of receipt and notice to the complainant;
- Transferring the file to the AMF, at the complainant's request;
- Filing a report with the AMF using the Complaint Reporting System (CRS) only if a complaint is received. To date, no such complaints have been received.

## Definition of Complaint

A complaint means any dissatisfaction or reproach in respect of a service or product offered by a financial institution or financial intermediary, or in respect of a practice of a credit assessment agent, that is communicated by a person who is a member of the clientele of the financial institution or financial intermediary, or, in the case of a credit assessment agent, by a person concerned by a record held by the credit assessment agent, that cannot be remedied immediately and for which a final response is expected.

Informal steps to correct a specific problem are not considered a complaint, provided the problem is resolved as part of the registrant's normal activities and the consumer has not filed a complaint.

<https://lautorite.qc.ca/fileadmin/lautorite/consultations/Fin-2021-11/2021sept09-regl-traitemment-plaintes-differends-cons-en.pdf>

## Receipt of the Complaint

Consumers who wish to file a complaint must do so in writing to our office as follows:

**IDC Worldsource Réseau D'Assurance Inc.** | 6100 route Transcanadienne, Suite 110 | Pointe-Claire, Que  
| H9R 1B9

Telephone: 514.961.2019

Fax:

EMPLOYEES WHO RECEIVE A COMPLAINT MUST IMMEDIATELY FORWARD IT TO THE PERSON IN CHARGE OF THIS POLICY. The person in charge must acknowledge receipt of the complaint within 5 business days of receiving it.

The acknowledgment of receipt must contain the following information:

- A description of the complaint, specifying the real or potential harm, the reproach against the registrant and the requested remedial action;
- The name and contact information of the person in charge of examining complaints;
- In the case of an incomplete complaint, a notice requesting more information to which the complainant must respond within a set deadline, failing which the complaint will be deemed to have been abandoned;
- The complaint examination policy;
- A notice stating that if not satisfied with the outcome or with the examination of the complaint, the complainant can request that the complaint file be transferred to the AMF. This notice must also mention that the AMF may offer dispute resolution services, if deemed appropriate;
- A reminder to the complainant that filing a complaint with the AMF does not interrupt the prescriptive period for civil remedies against the registrant.

Creation of the Complaint File: A separate file must be created for each complaint.

The file must contain the following:

- The written complaint and its three elements (the reproach against the registrant, the real or potential harm and the requested remedial action);
- The outcome of the complaint examination process (the analysis and the supporting documents);
- The final written response to the complainant with justifying reasons.

### Complaint Examination

On receiving a complaint, we must initiate our complaint examination process. The complaint must be examined within 5 days of receiving all the information necessary for the examination.

After examining the complaint, the person in charge must send the complainant a final response with justifying reasons.

## Transfer of the File to the AMF

We are required to describe the process for transferring a complaint file to the AMF.

If not satisfied with the outcome or with the examination of the complaint, the complainant may ask the registrant, at any time, to transfer the file to the AMF.

The transferred file must include all the information related to the complaint.

The registrant is responsible for complying with the rules governing the protection of personal information.

## Complaint Reports

Because we are registered as firms with only one representative, we are exempt from the twice a year complaint filing requirement. However, when we do receive a Quebec complaint, we are required to use the CRS to file a report with the AMF detailing the number and type of complaints received. \*

The reporting periods are as follows:

- no later than July 30, for data collected between January 1 and June 30;
- no later than January 30, for data collected between July 1 and December 31.

On May 25, 2007, the AMF issued guidance intended for independent representatives and firms with only one representative. This guidance states that the AMF no longer requires firms with only one representative or independent representatives governed by An Act respecting the distribution of financial products and services to file a report if they have not received any complaints. However, upon receipt of a complaint, they will still be required to report the complaint according to established procedures.\*

## Effective Date of this Complaint Policy:

The registrant must indicate the effective date of the policy. In addition, if the document is amended, the registrant must indicate the date of each amendment.

## Sample Documents

We do not expect to receive any appreciable numbers of complaints from Quebec customers. Consequently, if we do receive such a complaint, the AMF makes a number of useful documents and forms available on its website, to assist in managing the complaint. See <http://www.lautorite.qc.ca/en/complaint-examination-obligations.html>

Contact the AMF with questions:

Montréal: 514-395-0337

Toll-free: 1-877-525-0337

Fax: 418-525-9512 or 514-873-3090

E-mail: [information@lautorite.qc.ca](mailto:information@lautorite.qc.ca)