

# COMPLAINT HANDLING AND CONFLICT RESOLUTION POLICY

Our Complaint Handling and Dispute Resolution Policy is to establish a procedure that is fair and free of charge to our clients in order to ensure that complaints received by SYNEX BENEFITS SOLUTIONS, hereinafter referred to as "the firm", are handled appropriately.

Our firm wishes to take charge of any dissatisfaction communicated by its customers, with the aim of satisfying its customers while respecting the legal framework to which our firm is subject.

## 1. PERSON IN CHARGE OF COMPLAINTS

SANDRA LAFLAMME, Vice-President of Compliance for Synex Insurance and Synex Benefits Solutions partner firms. The person in charge must pass on to staff all the information they need to comply with this policy, while ensuring that it is applied.

## 2. DEFINITION OF A COMPLAINT

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

- A reproach against the registrant;
- The identification of a potential or actual prejudice that a consumer has suffered or may suffer;
- A request for corrective action.

## 3. DISSATISFACTION OR CONCERN TO BE ADDRESSED

A complaint does not include any informal action taken to correct a particular problem, as long as the problem is dealt with as part of the registrant's regular activities and the consumer has not lodged a complaint.

In the first instance, SYNEX BENEFITS SOLUTIONS and its partner firms encourage all complainants to contact their representative or the customer service department by telephone (604)-688-7208 or by e-mail at the following address: [compliance@zebs.ca](mailto:compliance@zebs.ca).

#### 4. HOW TO FILE A COMPLAINT

Complainants who are not satisfied with the answers or information obtained at the previous stage and wish to lodge a complaint should do so by e-mail or in writing to the following address:

Email : [compliance@zebs.ca](mailto:compliance@zebs.ca)

SYNEX BENEFITS SOLUTIONS  
666 Burrard St, 1200  
Vancouver, BC, V6C 2X8  
Tel: (604)-688-7208

*With the subject line: "Complaint - to be given to the complaints officer".*

#### 5. RECEIPT OF A COMPLAINT

Any employee who receives a complaint must forward it, as soon as it is received, to the person in charge of complaints. The person in charge must acknowledge receipt of the complaint within 10 working days of receipt.

#### 6. PROCESSING A COMPLAINT

Upon receipt of a complaint, SYNEX BENEFITS SOLUTIONS shall initiate its complaint handling process. The processing of the complaint, i.e. the analysis of the complaint and relevant documents, must be completed within a reasonable period of time, i.e. within 30 days of receipt of all the information required to study the complaint.

In the case of an incomplete complaint, a notice will be sent with a request for further information, to which the complainant must reply within 5 working days, failing which the complaint will be deemed to have been abandoned.

Once the complaint has been examined, the person in charge must send the complainant a final written response, with reasons.

#### 7. COMPLAINT FILE

A separate file must be kept for each complaint. This file must include the following elements:

- a) The complainant's written complaint, including the grounds for the complaint
- b) The complaint against the firm or independent representative;
- c) The actual or potential prejudice; The corrective measure requested);
- d) The result of the complaint handling process (analysis and supporting documents);
- e) The final response to the complainant, in writing and with reasons.

#### 8. FINAL RESPONSE (within 30 days)

The complainant must receive the firm's final, reasoned, written response. The complainant may accept or refuse the firm's written reply and may request that his or her file be transferred to the regulatory authority within your province. In the absence of a response from the complainant within 5 working days, the complaint will be considered abandoned.

## **9. TRANSFER OF FILE TO THE REGULATORY AUTHORITY WITHIN YOUR PROVINCE**

If the complainant is not satisfied with the final position reached or with the handling of his/her complaint, he/she may ask the person in charge to transfer his/her file to the regulatory authority within your province at any time. The transferred file contains all the information relating to the complaint. SYNEX BENEFITS SOLUTIONS remains responsible for compliance with the rules governing the protection of personal information in our possession.

## **10. ADOPTION AND MODIFICATION OF THE POLICY**

This Policy has been adopted by the Synex Executive Board and takes effect on the date of adoption. It replaces all previous versions. Historical versions of the Policy may be obtained from the Compliance team upon request.

The Compliance team is responsible for the Policy and its revision. The Policy may be amended at Synex's discretion to reflect changes in applicable requirements or Synex's practices and will be reviewed at least every three years.