



POLICY ON COMPLAINTS HANDLING PROCEDURES

1. Complaints Handling – Effectiveness, Efficiency and Accountability

This Policy sets out the procedures that apply to FCT Insurance Company Ltd., First American Title Insurance Company, First Canadian Title Company Limited and their affiliated companies in Canada where applicable (collectively, “FCT”). It ensures a consistent and fair approach for all clients, while recognizing specific rules that apply in different provinces. Section 3 covers complaints from outside Québec, and Section 4 outlines the process for handling complaints within Québec.

FCT senior management supports the procedures set forth in this Policy. FCT senior management will:

- appoint the Complaints Officer;
- provide support for the resources necessary to ensure that the Complaints Officer is adequately trained and has the necessary authority to resolve or recommend resolutions to complaints where possible; and
- endorse measures to support (i) implementation, dissemination and application of the Policy across the company, (ii) broad company wide training so that employees are familiar with these procedures; and (iii) implementation of methods to facilitate analysis of historical information, to track compliance issues and/or identify potential compliance risks.

FCT is committed to dealing with and resolving complaints in a timely manner. The Complaints Handling Procedures are set forth below. FCT is expected to inform complainants about these procedures, to keep complainants current about the status of their complaints at specific points during the complaint-handling process and to identify and highlight circumstances in which an extension of the timeline may be warranted, and to provide the complainant with a final decision. Each step of the complaint process must be conducted in an objective manner, and FCT must take into account the complainant’s interests. The process must be kept simple, and free of charge for the complainant

2. What constitutes a complaint?

For the purpose of this Policy, a **complaint** means any reproach or dissatisfaction regarding a service or product offered by FCT, communicated by a client, for which a final response (resolution or formal response) is expected.

What does not qualify:

- a. general feedback or suggestions;
- b. requests made for information or materials in respect of an offered product or service;
- c. a request for access or rectification made in accordance with the Act respecting the protection of personal information in the private sector or applicable privacy legislation;
- d. a claim for an indemnity or any other insurance claim;
- e. a request for correction of a clerical error or mistake in calculation, unless further action must be taken to address the consequences of the error or mistake for:
 - i. the person making the request;
 - ii. in the case of FCT, any other person who is a client;
- f. expressions of dissatisfaction where no resolution is requested; and
- g. issues that can resolved informally, without escalation or expectation of a formal response or follow-up.

3. Complaints Handling Procedures Outside Quebec:

- i. A party may make a complaint in writing, in person, by email or by telephone. The party making the complaint (the “complainant”) shall first contact the person with whom they had the interaction that gave rise to the complaint (the “FCT Employee”). It is suggested that as much information as possible be obtained, including supporting documentation. If FCT does not have the necessary information that it needs this will impact the complaint process. This information and supporting documentation must be readily available for the FCT Employee, Manager and Complaints Officer to access in order to process the complaint.
- ii. If the complaint remains unresolved, the FCT Employee shall inform their immediate manager (the “Manager”). The Manager shall attempt to resolve the complaint.
- iii. If the complaint remains unresolved, the Manager shall offer to escalate the matter to the Complaints Officer. Alternatively, the complainant may contact the Complaints Officer directly (contact information in Section 5 below). The role of the Complaints Officer is also set forth below.
- iv. The Complaints Officer shall create a separate file for each complaint. The file must contain the following:
 - The written complaint and its three elements (the reproach against the complainant, the real or potential harm and the requested remedial action);
 - The outcome of the complaint examination process (the analysis and supporting documents); and
 - The final written response to the complainant with justifying reasons.
- v. Within ten (10) days after a complaint is registered in the complaints register, the Complaints Officer must send the complainant a notice stating the complaint registration date and the complainant’s right to have the complaint record examined as outlined in Section 3(vi) below.

- vi. Within ninety (90) days or less when possible, following receipt of all of the applicable information and documentation relevant to the complaint at the second level of complaint handling, the complainant shall be provided with a substantive written response (if the complainant prefers this can be by way of email) to their complaint that includes, at a minimum:
 - FCT's final decision/offer in response to the complaint, including appropriate details and
 - explanations regarding how the final decision was reached; and
 - the complainant's right to escalate the complaint (to those bodies noted in Section 5 below of which FCT is a member) upon receipt of FCT's final decision, if the complaint has not been resolved to the complainant's satisfaction or if the complaint has not been dealt with within the above said ninety (90) days. If FCT takes longer than the said ninety (90) days the complainant shall have the right to escalate the matter to the said bodies and FCT shall advise the complainant of such right.
- vii. If the complaint remains unresolved, the complainant shall be advised how to contact the organizations referred to in Section 5 below.

4. Complaints Handling Procedure in Quebec

- i. A party may make a complaint in writing, in person, by email or by telephone. The party making the complaint (the "complainant") shall first contact the person with whom they had the interaction that gave rise to the complaint (the "FCT Employee"). It is suggested that as much information as possible be obtained, including supporting documentation. If FCT does not have the necessary information that it needs this will impact the complaint process. This information and supporting documentation must be readily available for the FCT Employee, Manager, and Complaints Officer to access in order to process the complaint.
- ii. The FCT Employee will immediately inform the Complaints Officer, who will then record the complaint and all related information in the complaints register.
- iii. If a complaint is minor and can be resolved quickly and in a less formal manner, FCT may use a simplified process. This process is appropriate when the complaint can be resolved within twenty (20) days of receipt. Upon receiving a complaint for which FCT determines the simplified process is appropriate, FCT shall, within ten (10) days of receiving the complaint, confirm receipt of the complaint and, where the complaint relates to the activities of FCT Insurance Company Ltd. or First American Title Insurance Company, inform the complainant of their right to have their complaint record examined by the Authority or, if applicable, a federation.

If resolved within this timeframe, FCT may communicate the outcome to the complainant, verbally or in writing, including:

- the conclusion of the analysis with the reasons and the outcome; and

- if an offer is made to resolve the complaint, the timeframe within which the complainant may accept the offer.

A complaint is considered resolved when:

- the complainant accepts the offer presented, or
- if no offer is made, the complainant accepts the outcome.

In such cases, a summary of the information provided to the complainant, and the resolution may be entered into the complaints register instead of the written acknowledgement of receipt required under Section 4(iv) below. If the complaint is not resolved within twenty (20) days, the Complaints Officer must send a written acknowledgment of receipt to the complainant no later than the 20th day following receipt of the complaint as required under Section 4(iv) below.

- iv. A standard process applies to complaints that are complex, require investigation, or cannot be resolved within twenty (20) days. For these complaints, the Complaints Officer must send the complainant a written acknowledgement of receipt within ten (10) days of receipt containing:

- the date the complaint was received;
- the complaint record identification code associated with the complaint;
- means by which the complainant may obtain information about the complaint and its processing;
- FCT's expectant timeframe for processing the complaint and the date by which the final response must be provided;
- a link to a summary of FCT's Policy on Complaints Handling Procedure, or a copy of such summary; and
- where the complaint relates to the activities of FCT Insurance Company Ltd. or First American Title Insurance Company, the complainant's right to have the complaint record examined by the Authority or, if applicable, a federation.

- v. The complaint file shall include:

- the complaint and any supporting documents, including any documentation relating to an offer to resolve the complaint, or information about other parties involved in the complaint, if applicable;
- a copy of the acknowledgment of receipt sent to the complainant;

- the outcome (analysis and supporting documents);
- if applicable, a copy of any written notices referred to in these procedures;
- a copy of the final written response to the complainant with justifying reasons (including, if applicable, a written notice to the complainant that FCT is not able to resolve the complaint); and
- all communications with the complainant;

The file must be kept up to date and retained by FCT for the same retention period applicable for any information relating to the complaint.

- vi. If the complaint remains unresolved within five (5) days of FCT receiving the complaint, the FCT Employee shall inform their immediate manager (the “Manager”). The Manager shall attempt to resolve the complaint.
- vii. If the complaint remains unresolved after fifteen (15) days, the Manager shall offer to escalate the matter to the Complaints Officer or the complainant may contact the Complaints Officer directly (contact information in Section 5 below).
- viii. Within sixty (60) days (or less when possible) of receiving a complaint, FCT shall provide the complainant with a substantive written response (the “final response”) (if the complainant prefers, this can be by way of email) which must include:
 - FCT’s final decision/offer in response to the complaint;
 - a statement confirming that it is FCT’s final response;
 - a summary of the complaint with the conclusion of the analysis, including details and reasons;
 - where the complaint relates to the activities of FCT Insurance Company Ltd. or First American Title Insurance Company, a statement of the complainant’s right to request to have the complaint record examined by the Authority or, if applicable, by a federation, with an explanation of how to make that request;
 - the business contact information and signature of the person who processed the complaint; and
 - the complainant’s right to escalate the complaint to the appropriate external body referenced in Section 5 below upon receipt of FCT’s final decision, if the complaint has not been resolved to the complainant’s satisfaction or if the complaint has not been addressed within sixty (60) days.
- ix. If FCT presents an offer to resolve the complaint:

- FCT must provide the complainant with a reasonable amount of time to assess the offer, seek advice as desired, and respond;
 - Where the complaint relates to the activities of FCT Insurance Company Ltd. or First American Title Insurance Company, no conditions may be attached to an offer which: (a) prevent the complainant from exercising their right to have the complaint record examined by the Authority, (b) require the complainant to withdraw any other complaint they may have filed, or (c) prevents the complainant from communicating with the Authority; and
 - If the complainant chooses to accept FCT's offer to resolve the complaint, FCT must give effect to the offer no later than 30 days from when the offer was accepted, or within a time period mutually agreed upon with the complainant.
- x. If there are exceptional circumstances that delay FCT's final response beyond sixty (60) days, FCT shall provide the final response to the complainant as soon as possible but no later than ninety (90) days following the receipt of the complaint. In such a situation, FCT must send to the complainant as soon as possible, but no later than the 60th day following receipt of the complaint, a written notice containing the following information:
- the reason for the delay;
 - the date by which the final response must be given to the complainant; and
 - where the complaint relates to the activities of FCT Insurance Company Ltd. or First American Title Insurance Company, confirmation of the complainant's right to request to have the complaint record examined by the Authority or, if applicable, by a federation, along with an explanation of how to make said request.
- xi. The complainant may seek an update on the status of their complaint at any time by contacting the FCT Employee, or the Complaints Officer. If the complaint has been escalated to an external body, the complainant should contact the relevant external body.
- xii. After the final response has been provided and until the complaint is fully resolved, with no further actions required, FCT must continue to manage any exchanges with the complainant, including allowing the complainant to submit any further relevant facts or questions that the complainant would like FCT to answer.
- xiii. If the complaint remains unresolved, the complainant shall be advised how to contact the external organizations referred to in Section 5 below.
- xiv. If a complaint involves more than one financial institution, financial intermediary or a credit assessment agent (the "other parties"), FCT must notify the complainant of the extent that the complaint involves such other parties, and of the complainant's right to file a complaint with respect to the other parties. FCT shall provide the complainant with any information that would allow the complainant to communicate with the other parties.

- xv. Where the complaint relates to the activities of FCT Insurance Company Ltd. or First American Title Insurance Company, if a complainant requests to have the complaint record examined by the Authority, FCT must, within fifteen (15) days of receipt of the request, send the complaint record to the Authority. If the Authority requests the Complaints Officer's contact information, FCT must provide it within ten (10) days.
- xvi. In any representations or communications intended for the public, FCT cannot call its complaints department or staff "ombudsman" or use any similar term that suggests they are independent of FCT.
- xvii. As required by Section 4(vi) above, the summary of FCT's Policy on Complaints Handling Procedure must contain:
 - A description of the procedure for filing a complaint, and a complainant's right to obtain assistance in filing a complaint;
 - A description of the steps in the complaint process;
 - A statement confirming that a complaint relating to the activities of FCT Insurance Company Ltd. or First American Title Insurance Company may be validly filed using the complaint form on the Authority's website, along with the reference or link to the website page: <https://lautorite.qc.ca/en/general-public/assistance-and-complaints/making-a-complaint>
 - the means by which the complainant may obtain information regarding the processing of the complaint;
 - the complaint processing time (which should be as soon as possible, but no later than within 60 days following receipt of complaint, or 90 days in exceptional circumstances or circumstances beyond FCT's control);
 - where the complaint relates to the activities of FCT Insurance Company Ltd. or First American Title Insurance Company, confirmation that the complainant has a right to request to have the complaint record examined by the Authority, or, if applicable, a federation, along with an explanation on how the complainant may make such a request.

Where such summary is posted on FCT's website, it must be able to be easily identified by its customers.

5. Role of the Complaints Officer and Contacts

The role of the Complaints Officer is to provide a forum for our customers and other parties to voice concerns following interactions with our employees. These concerns could range from the manner in which they were addressed to the handling of insurance claims, including denials.

The Complaints Officer will assess whether the correct internal process was adhered to, ensure

that the party lodging the complaint has been given every opportunity to be fully and fairly heard and provide a written response setting out their findings. The Complaints Officer shall have discretion to refer the matter back (with recommendations if they so choose) to either the FCT Employee or to the FCT Employee's Manager.

The Complaints Officer shall periodically report to FCT's Chief Compliance Officer on the following items with respect to complaints:

- The amount of complaints received and processed;
- Any common causes across the complaints received;
- Any issues identified when the common causes were ascertained;
- The outcomes of the complaint process; and
- Any issues relating to the implementation, dissemination of, and compliance with this Complaints Handling Procedure.

Contact Persons:

FCT:

Tanya Fowler
Complaints Officer
2235 Sheridan Garden Drive
Oakville, Ontario, L6J 7Y5

complaints@fct.ca

tel: 905.287.1000

fax: 905.287.2400

Financial Consumer Agency of Canada ("FCAC"):

FCAC supervises all federally regulated financial institutions, which includes federally regulated insurance companies such as FCT Insurance Company Ltd. and First American Title Insurance Company, for compliance with federal consumer protection laws, including the requirement to have a complaint-handling process in place. FCAC does not resolve individual complaints. If a complainant has a complaint relating to the activities of FCT Insurance Company Ltd. or First American Title Insurance Company, this complaint should be filed with FCT directly.

If the complainant is not satisfied with how the complaint was handled, the complainant is able to escalate the complaint to the external bodies noted in this Section 5, as applicable.

Where a complainant wants to know their rights or needs information about FCT Insurance Company Ltd. or First American Title Insurance Company's complaint-handling process, they may contact FCAC by online form, mail or telephone. FCAC uses information from consumer enquiries to support its mandate.

Mailing Address: Financial Consumer

Agency of Canada 427 Laurier Avenue
West, 5th Floor Ottawa ON K1R 7Y2

Web site: www.canada.ca/fcac

Online form: <https://www.canada.ca/en/financial-consumer-agency/corporate/contact-us.html>

Phone:

For service in English: 1-866-461-FCAC (3222)

For service in French: 1-866-461-ACFC (2232)

For calls from outside Canada: 613-960-4666

Teletypewriter (TTY): 1-866-914-6097 / 613-947-7771

Video Relay Service: FCAC welcomes Video Relay Service (VRS) calls. A complainant does not need to authorize the relay service operator to communicate with FCAC. Visit: <https://srvcanadavrs.ca/en/>

General Insurance OmbudService (“GIO”):

The General Insurance OmbudService (a third party dispute resolution organization) can be reached at 1 877 225 0446 or the complainant can also complete an online Complaint Form, the link to which is as follows:

<http://www.giocanada.org/submit-a-complaint-2>

Financial Services Regulatory Authority of Ontario (“FSRA”):

The complainant may also contact the Financial Services Regulatory Authority of Ontario (“FSRA”) at:

Financial Regulatory Authority of Ontario
25 Sheppard Avenue West, Suite 100
Toronto, ON
M2N 6S6
Tel: 1-800-387-0584

A complainant may also visit the following website to get more information on how to make a complaint to the FSRA: <https://www.fsrao.ca/submit-complaint-fsra>

Autorite des marches financiers (the “Authority”):

In the province of Quebec, if a complainant is not satisfied with the outcome or with the examination of the complaint, they may ask FCT, at any time, to transfer the file to the Autorité des marchés financiers (hereafter referred as the “AMF”). Only complaints relating to the activities of FCT Insurance Company Ltd. or First American Title Insurance Company may be transferred to the AMF for review. Complaints relating exclusively to services provided by First Canadian Title Company Limited, which is not an insurer, are not subject to AMF review. The AMF can be contacted at one of the following locations:

Québec

Place de la Cité, tour Cominar
2640, boulevard Laurier, bureau 400
Québec (Québec) G1V 5C1
Telephone: 418 525-0337
Fax: 418 525-9512

Montréal

800, square Victoria, 22^e étage
C.P. 246, tour de la Bourse
Montréal (Québec) H4Z 1G3
Telephone: 514 395-0337
Fax: 514 873-3090

Toll Free: 1 877 525-0337

A complainant may also visit the following website to get more information on how to make a complaint to the AMF: <https://lautorite.gc.ca/en/general-public/assistance-and-complaints/making-a-complaint>

6. Complaints Reporting Procedure:

FCT reports to certain entities with respect to reportable complaints (based on applicable legislation) pursuant to the terms of the attached Schedule entitled “Complaints Reporting Procedures”, as such Schedule may be updated from time to time.

Revision History – Complaints Handling Procedures - Approved Changes:

Policy Date	Approved by	Change Summary
March 9, 2005	BOD	Policy adopted
August 11, 2008	BOD	No changes
August 14, 2009	BOD	Reporting function added
August 7, 2010	BOD	Reporting function updated
August 10, 2010	Corporate Secretariat	“FCT” Logo
August 22, 2011	BOD	No changes
January, 2012		Added “reporting procedures” section and schedule
May 8, 2013	Legal	Amendments to Policy
August 1, 2013	BOD	BOD approved changes to Policy by Legal
July 28, 2014	BOD	Minor change Yearly review of policy has been amended to bi-annual review starting in 2015
July 30, 2015	BOD	No changes
April 26, 2016	BOD	No changes
March 8 th 2017	Legal	Change to include contact information for the AMF
May 8, 2017	BOD	No changes
January 15, 2018	Legal	Change to update Complaints Officer
May 1, 2018	BOD	Approved policy change above
March 22, 2019	Legal	Change to update Complaints Officer
April 30, 2019	BOD	Approved policy change above
February 18, 2020	Legal	Revision to the policy to comply with the new Quebec Insurer’s Act
July 28, 2020	BOD	Amendment to section 2
April 27, 2021	BOD	No changes
August 18, 2021	Legal	Change to update Complaints Officer
February 13, 2023	Legal	Changes to pronouns throughout the policy
August 3, 2023	Legal	No changes
November 11, 2025	BOD	Revision to the policy to comply with Quebec’s new AMF Regulation
January 27, 2026	Legal	Edits to reflect updated guidance from FCAC and clarification that only complaints relating to the activities of FCT Insurance Company Ltd. and FATIC may be transferred to the AMF.
May 21, 2026	BOD	Approved Policy change above

COMPLAINTS REPORTING PROCEDURES SCHEDULE

FCT reports to the following entities with respect to complaints:

1. AMF on a semi-annual basis;
2. Participating Authorities for the Rest of Canada (PARC) on a semi-annual basis; and
3. Financial Services Commission of Ontario (FSCO) on a semi-annual basis.