

LOCKTON BROKERS, ULC - COMPLAINT HANDLING AND DISPUTE RESOLUTION POLICY

1. PURPOSE OF THE POLICY

The purpose of this policy is to outline Lockton Brokers ULC's ("**Lockton Canada**") Complaint Handling and Dispute Resolution Policy and Process.

This policy establishes a framework to ensure that customer complaints are reviewed and resolved fairly by Lockton Canada. This includes:

- Providing a complaint processing service that is accessible and easy for customers to use;
- Demonstrating transparency and providing detailed information to customers so they understand how their complaints are handled; and
- Managing complaints, from receipt to resolution, with clear communication on the outcome of Lockton Canada's investigation into the complaint.

This policy is also intended to help improve our services by identifying common causes of customer complaints, so the appropriate solutions can be implemented at Lockton Canada to correct systemic service delivery issues. This policy applies to all Lockton Canada personnel and must be implemented, disseminated, and applied across the organization.

2. OUR COMPLAINTS TEAM

Lockton Canada's **Customer Success Consultant** ensures the complaints we receive are processed fairly so that:

- Our customers can readily obtain information on how we handle and process their complaints;
- The appropriate staff are handling customer complaints;
- Our staff understand and consistently apply our Complaint Handling and Dispute Resolution Policy and process; and
- Each customer complaint is handled objectively and in a manner that considers the customer's interests.

3. WHAT WE CONSIDER A COMPLAINT

A complaint expresses a customer's reproach or dissatisfaction with respect to a service and/or product Lockton Canada or its affiliates offer and the customer's expectation that we take action to investigate their complaint. Not all customer complaints are considered valid. Below are examples of requests or comments that are not considered valid complaints:

- A request for information or materials regarding a product or service;
- A claim for an indemnity or an insurance claim;
- 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 the person making the request or for any other customer);
- A request for access to, or amendment of, personal information; or
- Comments or feedback about Lockton Canada.

4. STEPS IN THE COMPLAINT PROCESS

We process each complaint fairly and objectively, free of charge for the customer, taking into account the customer's interest. We communicate with the customer in clear and plain language and provide the necessary assistance to help the customer file their complaint. Our customers may file a complaint by:

- Submit an online complaint escalation form at [NTD: Insert web link];
- Email at: [NTD: Insert e-mail address]
- Phone at: (818) 482-4086
- Mail at: **Lockton Brokers, ULC**
Attention: Lockton Canada Complaint Resolution Program
C/O Dentons 250 Howe Street, Vancouver, BC V6C 3S9
- For residents of Quebec, you may also complete the complaint form from the Autorité des marchés financiers (AMF) at: <https://lautorite.qc.ca/en/general-public/assistance-and-complaints/making-a-complaint>

5. RECEIPT OF A COMPLAINT

All customer complaints are entered into Lockton Canada's complaints register for tracking purposes. We acknowledge receipt of a customer's complaint in writing within 10 days of its receipt and ensure that complaints are assigned promptly to the appropriate personnel under the functional supervision of the Complaints officer, for investigation and handling.

For residents of Quebec, the acknowledgement of receipt will include:

- the complaint record identification code;
- the date on which the complaint was received;
- the means by which the customer may obtain information about the processing of the complaint;
- the expected timeframe for processing and the date before which the final response must be provided;
- a hypertext link providing access to this policy; and
- the customer's right to have their complaint record examined by the AMF.

6. COMPLAINT HANDLING

Upon receipt of a customer complaint, the **Customer Success Consultant** will:

- Enter the complaint into Lockton Canada's complaints register;
- Engage the appropriate personnel under the functional supervision of the Complaints Officer within 1 business day to begin investigating the complaint;
- Monitor for resolution of the complaint within 20 calendar days;
- Ensure the outcome of the investigation and associated resolution is summarized in the complaint record; and
- For residents of Quebec, ensure the customer is informed of their right to request to have their complaint record transferred to the AMF within 10 business days.

If the complaint cannot be resolved to the satisfaction of the customer within 20 calendar days, the Customer Success Consultant must send the customer, no later than the 20th day following receipt of the complaint, a written notice including the information normally included in the acknowledgement of receipt (as described in Section 5 above), and the complaint will be transferred to the Complaints Officer for the formal process described below

Upon receipt of a customer complaint, the **Customer Success Consultant** will:

- Enter the complaint into Lockton Canada's complaints register;

- Send a formal letter to the customer within 10 business days acknowledging receipt of the complaint;
- Provide the customer with a final written response upon completion of the investigation, including a summary of the complaint, the analysis findings, the rationale supporting the outcome of the complaint investigation. This correspondence will be sent no later than 60 calendar days following receipt of the complaint;
- When justified by exceptional circumstances or circumstances beyond the Customer Success Consultant's control, the Customer Success Consultant will notify the customer in writing no later than the 60th day following receipt of the complaint, that additional time is required to complete the investigation. The written notice must include the circumstances warranting the extension, the date by which a final response will be provided, and a statement of the customer's right to request examination by the AMF. The additional time may not exceed 90 calendar days from receipt of the complaint.
- If a resolution offer is presented to the customer, a reasonable timeframe will be provided to allow the customer to assess and respond. Upon acceptance of the resolution offer, Lockton Canada must implement it within 30 days, unless an alternative timeframe is agreed upon with the customer.
- Respond to additional inquiries from the customer and/or allow the submission of new or relevant information, until no further action is required to address the complaint.

If the customer does not provide the necessary information or documentation required to investigate the complaint, the Customer Success Consultant will send a formal letter requesting that the outstanding information/materials be submitted within 10 days. If not received, a final written notice will be sent, informing the customer that the complaint will be closed until the required materials are received.

7. TRANSFER OF A CUSTOMER COMPLAINT TO THE AMF OR OTHER THIRD-PARTY DISPUTE RESOLUTION ORGANIZATION

If the customer is not satisfied with the final response received from the Customer Success Consultant or the way their complaint was handled, they may, at any time, ask the AMF (or any other third-party dispute resolution organization applicable to their province of residence) to review their complaint.

Lockton Canada must send the customer's complaint file to the AMF for investigation within 15 days of receiving the customer's request. Lockton Canada complies with the terms and conditions established under the Quebec applicable regulation and as outlined on the AMF website.

For residents of Quebec:

AMF:

<https://lautorite.qc.ca/en/general-public/assistance-and-complaints/making-a-complaint>
[1-877-525-0337](tel:1-877-525-0337)

8. EFFECTIVE DATE

This policy is effective July 30, 2026.