

Client Complaints Handling Process

All client complaints are deemed serious in nature at CWB Wealth Partners. We have implemented a complaint handling process to ensure that our process is clear to all clients, and that all complaints are dealt with promptly, effectively, and fairly.

The following information will guide you through the process and information you'll need to know should you have a complaint.

Who handles complaints at CWB Wealth Partners?

The Chief Compliance Officer (CCO) is the designated Complaints Officer (CO).

What is considered a complaint?

A complaint is defined as follows:

- A recorded (any written submission and/or electronic communication) or verbal expression of dissatisfaction with CWB Wealth Partners or an employee of CWB Wealth Partners alleging misconduct
- An expression, as described above, that is submitted by the client or person authorized to act on behalf of the client
- An allegation of a contravention against any provision of legislation or law concerning:
 - securities or exchange contracts of any jurisdiction inside or outside of Canada
 - any rules, rulings or policies of any regulatory or self-regulatory organization
 - professional licensing or registration bodies in any jurisdiction inside or outside of Canada

Alleged misconduct includes, but is not limited to, allegations of:

- breach of confidentiality
- theft
- fraud
- misappropriation or misuse of funds or securities
- forgery
- unsuitable investments/recommendations
- misrepresentative or unauthorized trading relating to a client's account(s)
- other inappropriate financial dealings with clients
- engaging in securities related activities outside of CWB Wealth Partners
- unauthorized or discretionary trading
- churning
- money laundering or terrorist financing
- market manipulation
- insider trading

There are **two types** of complaints:

- **Service-related issues** – this includes administrative and operational issues. Service-related issues need not be reported to the regulators and can be handled internally.

- **Misconduct/alleged misconduct** - these types of complaints must be reported to the regulators.

What is the complaint handling process?

Notification

- All complaints whether verbal or written (including electronic communication) will be brought to the attention of the firm's CO immediately.
- If a complaint is made verbally, CWB Wealth Partners will ask that you put your complaint in writing to ensure that all the issues and facts are documented accurately.
- If a complaint is made directly to the CO, the individual in question will be notified immediately of the complaint against him/her.
- Once in receipt of a complaint, we will determine whether it's appropriate for the individual to continue to service the client's account(s).
- The CO will notify senior management immediately of a complaint and updates will be provided during the course of any internal investigation.

Acknowledgement letter

Within five business days of receiving a written complaint, the CO will send the client an acknowledgement letter that includes:

- The name, job, title and full contact information of CWB Wealth Partners' CO
- A statement indicating that the client is to contact the CO if he/she would like to enquire about the status of the complaint
- An explanation of CWB Wealth Partners internal complaint handling process, including but not limited to the role of the CO
- A reference to an attached copy of CIRO'S complaint handling process brochure, 'How to Make a Complaint', that reference the statues of limitations and your available options
- An explanation of the 90 calendar days timeline to provide a substantive response to complaints and a date when the client will receive a substantive response
- A request for any information reasonably required to investigate the complaint

Preliminary review and determination of merit

Once in receipt of a written document, the CO will thoroughly review the complaint and create a report on the Canadian Investment Regulatory Organization's (CIRO) complaint reporting system, COMSET.

During the preliminary review, the CO will determine whether the complaint has merit. Merit relates to whether there has been a breach of any self-regulatory organization rules, applicable securities and other legislation or internal policies.

Complaint determined to be without merit

The client will receive a substantive response letter detailing the decision and explaining that no further investigation will be conducted. (see 'Substantive response' section)

Complaint determined to have merit

The CO will launch an internal investigation:

- The individual in question will have an opportunity to respond to the CO regarding the allegations. The individual in question must provide a written summary that includes applicable documents and information relating to the complaint.
- Once in receipt of information from both the client and the individual in question, the CO will commence an internal investigation. The CO will analyze the information and compare the client's allegations to the firm's documents on file and the individual's client notes to determine if there are any inconsistencies between the two.
- The CO must ensure to the best of his/her abilities that all avenues of research have been completed and all facts in the case have been provided. The CO may contact the client to request additional information. Each complaint will be considered individually on its own merits.
- During the review, the CO will maintain a record detailing the steps taken, the information reviewed (regulations, internal policies, etc.) and the way the results were determined.
- Should there be a need to discuss a potential resolution or settlement CWB Wealth Partners' legal council may be involved.
- Once a review has been completed and an outcome determined, the CO will prepare a substantive response letter to be mailed to the client.

Substantive response

Substantive response letter will be provided to the client within 90 days of receiving the complaint. If CWB Wealth Partners requires more than 90 days to respond, details will be provided in the letter explaining the circumstances around the delay as well as providing a new time frame for the substantive response.

The letter must be written in language that is clear, fair, and not misleading to the client and must include:

- A summary of the complaint
- The results of CWB Wealth Partners' investigation
- CWB Wealth Partners' final decision on the complaint including an explanation
- A statement describing the options available to the client if they are not satisfied with CWB Wealth Partners' response, including:
 - Arbitration
 - Ombudsmen for Banking Services and Investments (if the request is made within 180 days from the date of CWB Wealth Partners' final response)
 - A regulatory complaint to the CRO for an assessment of whether disciplinary action is warranted
 - Litigation/civil actions
- An explanation that no further investigation will take place, if CWB Wealth Partners has determined that the complaint is without merit

Settlement Agreements

If CWB Wealth Partners determines that compensation is warranted, a release must be signed by the client before any payment can be made.

A release entered into between CWB Wealth Partners, and the client may not impose confidentiality or similar restrictions aimed at preventing the client from initiating a complaint to the securities regulatory authorities, self-regulatory

organizations or other enforcement authorities. A release cannot restrict the client from continuing with a pending complaint or participating in any further proceedings by the previously listed authorities.

Internal Discipline

Breaches of self-regulatory organization rules as well as applicable securities and other legislation are subject to appropriate internal disciplinary procedures. Consequences/penalties for breaches of firm policies and procedures will be assessed on a case by case basis. Not all internal investigations will lead to disciplinary actions but serious breaches of the firm's policies and procedures can.

If the CO determines through his/her internal investigation that there are systemic or recurring complaints/issues, a thorough review will be performed by the CCO regarding the effectiveness of the policies and procedures that CWB Wealth Partners has in place. The review may determine that additional controls must be implemented to mitigate any further re-occurrence of the issues.

Client Access to Complaint Process

A copy of CWB Wealth Partners' complaint handling procedures will be made available to clients on CWB Wealth Partners' website at www.cwbwealth.com and clicking on CWB Wealth Partners under the heading How We Serve.

Record Retention

Every complaint file will be maintained and accessible for seven years. CWB Wealth Partners will maintain on site for two years: all complaint files and history including all documentation, COMSET submission information and internal employee discipline information relating to a complaint. The information will include:

- The complainant's name
- The date of the complaint
- The nature of the complaint
- The name of the individual who is the subject of the complaint
- The security or services that are subject of the complaint
- The materials reviewed in the investigation
- The name, title and date individuals were interviewed for the investigation and
- The date and conclusions of the decision rendered in connection with the complaint

Should you have any questions regarding CWB Wealth Partners complaint handling process, please contact the Chief Compliance Officer at:

CWB Wealth Partners Ltd.

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