

Investigating a Complaint

Upon receipt of a client complaint, the CCO will provide the complainant a written acknowledgement of said complaint within five (5) business days.

The CCO will provide the employee in question along with his/her supervisor with a copy of the complaint; the employee is required to provide a written reply to the CCO. The investigation will be conducted by the compliance department exclusively.

Within ninety (90) days, the CCO will provide the firm's final decision to the complainant. This decision must be approved by the CEO and contains the following:

1. A copy of IIROC's "An Investor's Guide to Making a Complaint";
2. A summary of the complaint;
3. The results of SPI's investigation;
4. An explanation of SPI's final decision;
5. The other options for seeking compensation available to the complainant if the client is not satisfied with SPI's response.
 - a. Quebec residents only – mediation services offered by the Quebec Securities Commission (AMF);
 - b. IIROC's Arbitration Program;
 - c. Submit a complaint to the Ombudsman for Banking Services and Investments (OBSI);
 - d. Pursue legal action.

If SPI is unable to reply within ninety (90) days, the CCO will provide the complainant the reason(s) for the delay and the anticipated new response time. SPI will be updating IIROC via ComSet of the entire process.



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Quebec Clients

In addition to the above, SPI will provide an equitable resolution to Quebec complaints by ensuring the following:

1. A thorough examination of all the allegations related to the complaint or claim filed with SPI by a person having an interest in a product or service provided by SPI (a “complainant”);
2. A resolution to all the allegations related thereto.

SPI will inform every complainant, in writing and without delay, that should the complainant be dissatisfied with either SPI’s complaint handling procedures or SPI’s resolution, the complainant may request SPI to forward a copy of the complaint file to the *Autorité des marchés financiers* (“AMF”). Should the complainant choose this route, SPI will forward the complaint to the AMF which will examine it. The AMF may then act as mediator should the AMF, SPI and the complainant deem it appropriate.

