



La Compagnie d'assurances Jevco
Jevco Insurance Company Inc.

Complaint Handling Procedure

June 2010

Table of Contents

NOTICE	1
BACKGROUND AND PURPOSE.....	2
PROCEDURES.....	2
Step 1: Contact Your Broker.....	2
Step 2: Contact Your Jevco Representative	2
Step 3: Contact our Ombudsman or Consumer Complaints Officer	3
Step 4: Contact the General Insurance OmbudService (GIO) and/or the Financial Consumer Agency of Canada	5
Step 5: Consult Your Provincial Superintendent of Insurance or Relevant Provincial Authority.....	6
REPORTING OF COMPLAINTS.....	7
Quebec and Ontario.....	7
Alberta.....	8
CREATION OF FILE FOR EVERY COMPLAINT	8
COMMUNICATION WITH YOU.....	9
MONITORING.....	9

NOTICE

The information in this document is proprietary to Jevco Insurance Company Inc. ("**Jevco**" or the "**Company**"). This document is classified "Free Access". Access to this document is provided freely to employees, agents, brokers and the public through the organization's website and from the organization's Ombudsman or Consumer Complaints Officer.

The Company's Ombudsman is the owner of this document and is responsible for keeping it up to date.

BACKGROUND AND PURPOSE

In order to establish fair complaint handling procedures and to standardize the management of complaints, Jevco has adopted this Complaint Handling Procedure. It is applicable to all written and oral complaints received relative to insurance products or services distributed in all Provinces of Canada.

All complaints, not only those related to a potential violation or infringement of the laws and regulations, will be considered and reasonably investigated and addressed by the Company.

We are committed to delivering the best possible service to our customers, and have taken all necessary measures to inform all Jevco employees of our complaint handling procedures.

PROCEDURES

If you are not satisfied with the products or service you received, we want to hear from you. There are many options available to you, as follows:

Step 1: Contact Your Broker

Generally, most issues can be resolved promptly with a simple explanation. Contact your independent insurance broker first to discuss your concerns.

Step 2: Contact Your Jevco Representative

If you feel your broker has not adequately addressed your concerns, contact your Jevco representative by phone, mail, or email (Jevco contact information is available below or at www.jevco.ca).

If you know the name of the Jevco Representative who is responsible for your policy or claim, please contact that person directly. If you are unsure who to contact, ask your broker to provide you with the Jevco representative responsible for your file. Your complaint will then be handled by staff in the relevant department as follows (non-exhaustive list):

<i>Type of Complaint</i>	<i>Department Responsible</i>
NSF fees	Accounting
Premium increases	Underwriting

Policy declined	Underwriting
Claim denied	Claims
Coverage declined	Underwriting
Cancellation of policy	Underwriting
Adjuster not returning calls	Claims
General inquiries	Relevant department
Changes to driving records	Underwriting
Broker disagreement on coverage or fault	Claims / underwriting
Names referred to collection agency	Accounting
Disagreements with deductible charged on claim	Claims
Claims invoices not paid to supplier	Claims

Of course, in some cases, depending on the type of complaint to be handled, your complaint may be directly referred to management to handle.

Upon receipt of your complaint, a file will be opened and logged into our system. If your complaint is incomplete or we require further information from you, we will contact you.

If, upon receipt, a complaint cannot be resolved with three business days, we will advise you by sending an acknowledgement of receipt. The purpose of the acknowledgement of receipt is to inform you of:

- ✓ the contact information of the representative responsible for handling your complaint¹; and
- ✓ the estimated time required to respond to your complaint.

If you are not satisfied with the service you have received or the handling of your complaint by the frontline staff, you will be referred to the relevant department manager, who will review your complaint.

Step 3: Contact our Ombudsman or Consumer Complaints Officer

If your complaint cannot be resolved at the operational level, or you are dissatisfied with the outcome of your complaint, you may choose to contact our Ombudsman or Consumer Complaints Officer. The Ombudsman or Consumer

¹ However, the Ombudsman is ultimately responsible for complaints and reporting it to, and dealing with, the regulatory authorities or the mediator.

Complaints Officer is an employee of the Company that acts as an impartial link between you and the Company. These individuals can be reached at:

Ombudsman – Louis-Philippe Tanguay

Jevco Insurance Company Inc.
5250, Decarie Blvd., Suite 100
Montreal (Quebec), H3X 2H9

Phone 514.284.8394
Toll-Free 1.800.361.8500 ext. 8394
Fax 514.284.3374
E-mail lpanguay@jevco.ca
Company's web site <http://www.jevco.ca>

Consumer Complaints Officer – Nancy Carnahan

Jevco Insurance Company Inc.
7120 Hurontario Street, Suite 700
Mississauga, Ontario, L5W 0B1

Phone 905.677-8889
Toll-Free 1.800.265.5458 ext.2573
Email ncarnahan@jevco.ca

When a complaint is filed with the Ombudsman or Consumer Complaints Officer:

- ✓ Your file and complaint is reviewed;
- ✓ Your position and the handling of your complaint is discussed with the appropriate personnel in the Company; and
- ✓ A suggestion is made to resolve the issue in a fair and satisfactory manner.

If you expressly request to communicate with the Ombudsman or Consumer Complaints Officer, the Ombudsman or Consumer Complaints Officer will determine the nature of the complaint and will either handle the complaint or transfer it to the appropriate department (or designated individual in that department), then follow-up on the file at a later date.

The Ombudsman or Consumer Complaints Officer does not:

- ✓ investigate, negotiate or settle claims; and

- ✓ intervene in any matters dealt with in the courts or dispute resolution process.

After investigating, if your complaint cannot be resolved to your satisfaction, the Ombudsman or Consumer Complaints Officer will ask the department manager handling your complaint to prepare a final position letter (copy will be sent to your broker), together with instructions on how to file a complaint with the GIO and the appropriate regulatory authority.

Step 4: Contact the General Insurance OmbudService (GIO) and/or the Financial Consumer Agency of Canada

The GIO is an independent, regionally-based, consumer dispute-resolution system for the insurance industry. If you are not satisfied with the way your complaint has been handled or the post-analysis received, you may choose to contact the GIO as follows:

General Insurance OmbudService

Toll Free 1.877.225.0446
Website www.giocanada.org ²

You may also choose to contact:

Financial Consumer Agency of Canada

427 Laurier Avenue West, 6th Floor
Ottawa, Ontario, K1R 1B9

Toll-free 1.866.461.3222
TTY 1.866.914.6097
Fax 1.866.814.2224
Internet message http://www.fcac-acfc.gc.ca/eng/contact_form.asp?1
Web site <http://www.fcac-acfc.gc.ca>

Our Ombudsman or Consumer Complaints Officer will assist the GIO or any appointed mediator in their investigations by providing answers to any questions posed.

² Complaints can be filed with the GIO online at: http://www.giocanada.org/complaint_form.html

Step 5: Consult Your Provincial Superintendent of Insurance or Relevant Provincial Authority

If, in the first instance, you wish to consult your provincial regulatory authority, or you are not satisfied with the way your complaint has been handled or the post-analysis received, you may ask us to transfer your file to your regulatory authority as follows:

Alberta Superintendent of Insurance

Alberta Finance and Enterprise
Superintendent of Insurance
Financial Sector Regulation and Policy (FSRP)
Room 402, Terrace Building
9515 - 107 Street
Edmonton, Alberta, T5K 2C3

Phone	780. 422.1592
Fax	780.420.0752
E-mail	insurance@gov.ab.ca
Web site	http://www.finance.alberta.ca/business/insurance/index.html

Autorité des marchés financiers (Quebec)

Autorité des marchés financiers
Place de la Cité, tour Cominar
2640, boulevard Laurier
Bureau 400
Sainte-Foy (Québec) G1V 5C1

Quebec	418.525.0311
Montreal	514.395.0311
Toll-Free	1.866.526.0311
Fax	418.647.0376
E-mail	renseignements-consommateur@lautorite.qc.ca
Website:	http://www.lautorite.qc.ca ³

³ AMF Consumer Complaint Forms & File Transfer Request Forms are available at:

- <http://www.lautorite.qc.ca/userfiles/File/Formulaire/formulaire-plainte-anglais.pdf>
- http://www.lautorite.qc.ca/userfiles/File/Formulaire/AMF_Formulaire_Transfert_A_final.pdf
-

Financial Services Commission of Ontario (FSCO)

5160 Yonge Street

P.O. Box 85

Toronto, Ontario, M2N 6L9

Phone 416.250.7250

Toll free 1.800.668.0128

TTY 1.800.387.0584

Fax 416.590.7070

Website www.fSCO.gov.on.ca⁴

The appropriate regulatory authority will analyse your complaint and suggest mediation if considered appropriate and if the two parties assent to such mediation. Mediation is an amicable settlement process in which a third party (called the mediator) intervenes to help both parties reach a satisfying agreement.

Our Ombudsman or Consumer Complaints Officer will provide the regulatory authority or the mediation form with any additional information needed, then will provide the department manager with a copy of the regulatory authority's decision.

REPORTING OF COMPLAINTS

Jevco is under an obligation to report to the appropriate authorities every complaint related to financial products or services it distributes.

Quebec and Ontario

Accordingly, Jevco reports to both the AMF and the FSCO, complaints for products or services distributed in the province of Quebec and Ontario, respectively, using the Complaint Reporting System (hereinafter referred to as "CRS") set up by the AMF and FSCO. Complaints are reported on the CRS web site (<https://www.srp-crs.ca>) on a semi-annual basis, as follows:

<i>Reporting Period:</i>	<i>Declaration Deadline:</i>
January 1 to June 30	July 30
July 1 to December 31	January 30

⁴ Detailed procedures about how to file a complaint with FSCO can be found on the following web site: <http://www.fSCO.gov.on.ca/english/insurance/resolvecomplaint-insurance.asp>

The semi-annual report should include the following matters:

- ✓ complaint reference number;
- ✓ type of insurance product;
- ✓ complaint motives;
- ✓ opening and closing date of the complaint file;
- ✓ postal code of the complainant;
- ✓ complaint handling results;
- ✓ specify if the complaint lead to a lawsuit (if known);
- ✓ specify if the complaint has been transferred to the AMF or the FSCO.

Alberta

Complaints filed for products or services distributed in the province of Alberta are also reported by mail to the Superintendent of Insurance of Alberta, on a semi-annual basis, as follows:

<i>Reporting Period:</i>	<i>Declaration Deadline:</i>
November 1 to April 30	July 15
May 1 to October 31	December 15

The semi-annual report should include the following matters:

- ✓ number of complaints received;
- ✓ number of complaints resolved;
- ✓ distribution of complaints in different categories based on their general nature;
- ✓ any other information the Superintendent may request.

CREATION OF FILE FOR EVERY COMPLAINT

Generally speaking, to be receivable, a complaint should be in written form (letter, email, fax or any other communication form that allows conservation, reporting and filing). If you communicate your complaint by phone or in person, your complaint will be documented at all times by the representative who is handling it in order to keep track and ultimately for reporting purposes.

We will create a distinct file for every complaint and register it in a complaints log in order to transmit it in report form to the appropriate regulatory authorities on a fixed semi-annual basis.

We will document such information as:

- ✓ your complaint.
- ✓ the date and time of all contacts with you and summarize discussions or correspondence, including times when our representative is unable to reach you.
- ✓ whether the issue was resolved or not.
- ✓ whether you asked that your file be transferred to the Provincial Superintendent of Insurance or mediator.
- ✓ whether the file resulted in an action brought to court.

Through the process and subsequent to, we will take all appropriate steps to ensure that personal information is not disclosed or revealed without your written consent.

COMMUNICATION WITH YOU

If you are dissatisfied with the complaint examination procedure or its outcome, we will inform you in writing and without delay, of your right to forward your complaint file to the relevant authority or complaints resolution organization. Upon receipt of your request, we will forward your file which will include, but is not limited to, the following information:

- ✓ the complaint made against the Company;
- ✓ the potential or actual prejudice;
- ✓ the corrective measure requested;
- ✓ the result of the complaint handling process (that is, the analysis realised by the Company and any document that supports it);
- ✓ the Company's final response in written form (must include the rationale sustaining the conclusions).

MONITORING

On a regular basis, the Ombudsman or Consumer Complaints Officer will review the complaints log for the provinces of Quebec, Ontario and Alberta and will investigate all files with missing information or unresolved complaints as of the inquiry date, or files that require attention. In addition, on a regular basis, the Ombudsman or Consumer Complaints Officer shall remind all managers and employees of the procedures outlined in this Complaint Handling Procedure document.