

Dear Client,

Your feedback informs us and helps us. It helps us to seek innovative products, offer knowledgeable advice and provide you with the service you've come to expect from us. It also helps us to address your concerns so that we can ensure your experience is the best it can be. Whether you have words of praise, or suggestions on how we can improve, we'd like to hear from you.

Burgeonvest Bick Securities Limited ("Burgeonvest Bick") Corporate Values and Mission are both client focused. Our goal is to serve our client interests, however, as with all things there may be isolated circumstances that warrant client complaint communication to Burgeonvest Bick.

### **Complaint Process**

We take complaints seriously at Burgeonvest Bick and view them as our best way to identify and rectify problems. The fair and timely handling of client complaints is not just a good business practice it is also vital to the overall integrity of the investment industry. By solving your issue or concern, we will help improve our service levels to all our clients. We have established an effective framework for dealing with client complaints that is in keeping with appropriate standards of professionalism for the industry.

#### **Step One:**

Write a summary of what your issue or concern is and determine what it is you would like us to do. Then gather and assemble all pertinent information in respect of your issue or concern such as:

- Date(s) of occurrence,
- Supporting statements or documents, if any, and
- Identify the names of any specific Burgeonvest Bick staff involved.

Investment industry policies and procedures require that substantive complaints be in writing and we recommend traditional mail over email. Regardless, we will treat mail, email and telephone communications with the same level of urgency.

#### **Step Two:**

Talk to your Investment Advisor promptly about any service related issues. Alternatively, when calling your Advisor's office you may wish to speak with the Branch Manager. Burgeonvest Bick requires all service complaints to be logged internally for Head Office review and ongoing operational due diligence.

Complaints of a more serious nature involve allegations of misconduct are elevated immediately to the VP Compliance who will investigate the complaint. Should you have a serious complaint of this nature, please contact the VP Compliance directly. The Investment Industry Regulatory Organization of Canada (IIROC) defines misconduct as:

*"allegations of breach of confidentiality, theft, fraud, misappropriation or misuse of funds or securities, forgery, unsuitable investments, misrepresentation, unauthorized trading relating to the client's account(s), other*

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*inappropriate financial dealings with clients and engaging in securities-related activities outside of the Dealer Member”.*

Should your complaint be of a verbal nature you will be asked to put the complaint in writing so that all relevant facts relating to a complaint are captured. Once we receive your written complaint, it will be entered into our formal mail log which we use to ensure that all regulatory timeline requirements are met.

**Our Commitment to You:**

In keeping with IROC requirements we will send you an acknowledgement letter within 5 business days. That letter will contain the following:

1. The name, job title, and full contact information of the individual at BBSL handling the complaint;
2. A statement indicating that you should contact the individual at BBSL handling the complaint if you would like to inquire about the status of the complaint;
3. An explanation of BBSL’s internal complaint handling process, including but not limited to the role of the designated complaints officer;
4. A reference to an attached copy of the IROC approved complaint handling process brochure (also received at time of account opening) and a reference to the statute of limitations contained in the document;
5. The ninety (90) calendar days timeline in which a substantive response letter to your complaint will be completed (or an explanation if there is a delay); and
6. A request for any information reasonably required to investigate the complaint.

**The VP Compliance will then:**

- assimilate all data received; collect data from internal sources (Investment Advisor, Branch Manager, Head office files, branch files, operations files etc);
- prepare an analysis of the complaint, including Compliance Department findings; and
- Provide the analysis to the Designated Complaints Officer (who is also the Chief Executive Officer).

**Designated Complaints Officer Involvement:**

The role of the Designated Complaints Officer (“DCO”) is to be a dispassionate and objective reviewer of a complaint. The DCO will likely not have had contact with the client and is therefore best suited to conduct a final internal investigation of the complaint with the least potential conflict of interest. The DCO may re-interview any part of the investigation and may work in consultation with the VP Compliance as appropriate, but will be solely responsible for the ultimate findings of the investigation.

All documentation related to your complaint will be kept onsite for two years and all complaint files will be retained for seven years.

Finally, we wish to thank you for letting your issue be known to us. We take our client complaints seriously and we are committed to making every effort to resolve your concerns.

Sincerely,

Mario Frankovich, CEO and DCO