

Ethics and Privacy

Complaint Resolution

Client complaints are initially handled by their Financial Representative. If not resolved, the complaint is elevated to our Client Relations team. The Client Relations team was developed to improve client experience and provide quicker response times. The Client Relations team works to provide consistent, accurate and quick complaint resolution.

Clients can further elevate complaints to the Ombuds Office for a final review and position. The Board of Directors, senior management and provincial regulators are made aware of any reportable complaints, and each report is investigated fully.

Year	Number of reportable complaints
2022	119
2021	125
2020	154

Ethics

To maintain high standards of ethics and integrity across the organization and empower clients and employees to raise concerns, we have implemented varying policies and procedures:

- Code of Ethics and Business Conduct (the “Code”). Annually, all employees, advisors and their staff, contingent workers, and contractual third parties who are employed by or provide services to Co-operators, must sign and attest to the Code.
- Conflict of Interest program to prevent any conflicts of interest or the appearance of a perceived conflict, and to ensure that all decisions made are in line with our Code and based on the best interests of Co-operators.
- Speak Up hotline available 24/7 which offers an anonymous and secure avenue available in English and French to employees, advisors and their staff, contingent workers, and contractual third parties who are employed by or provide services to Co-operators. Further, reports can be made directly to managers, HR, Legal or Enterprise Compliance any time.

Privacy

The Chief Privacy Officer is responsible for the development and oversight of our organizational privacy policies and practices, and responds to all privacy-related requests, complaints, and inquiries.

- Privacy notice publicly displayed on our site and regularly updated to provide consumers with clear information on the collection, use and disclosure of their personal information.
- Privacy training course for all new employees to inform them on the importance of privacy and key concepts they need to know.
- Centralized reporting of privacy incidents across the organization and documented process for ensuring proper and consistent investigation is completed.