

Fair Treatment of Customers

At Co-operators, we value integrity, treating our members and customers with respect, supporting our employees, giving life to co-operative principles and values, and balancing our economic goals with concern for the environment and the welfare of Canadians. Our customers are at the core of our business placing them at the forefront of our strategy and service.

As an extension of these values our organization has recently adopted a Fair Treatment of Customers (FTC) Policy to further enhance our client facing Co-operators Public Statement on Fair Treatment of Customers.

Treating customers fairly is everyone's responsibility, and to emphasize the importance of FTC, an interactive training module has been created to highlight how we all contribute to this goal.

Aspects of FTC include ethics, privacy and complaint resolution.

Ethics

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

- 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 the Privacy Office responds to all privacy-related requests, complaints, and incidents. We have a comprehensive privacy program which considers current privacy laws and demonstrates accountability for our regulatory obligations. This includes:

- Public provision of our External Privacy Policy on our website which is regularly updated to provide consumers with clear information on how we collect, use and disclose their personal information.
- Privacy training for all new employees to educate them on the importance of privacy and key concepts of our privacy program.
- Processes and frameworks to effectively manage all reported privacy incidents across the organization and ensure consistent investigation is completed.
- Privacy Impact Assessment framework to identify and mitigate potential risks in initiatives across the organization that process personal information.

Complaint Resolution

Client complaints are initially handled by their Financial Representative. If not resolved, the complaint is elevated to a manager or 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 Office of Fair Client Practices (formerly 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
2024	222
2023	155
2022	119

For mutual fund related matters all complaints are relayed to Co-operators Financial Investment Services (CFIS) Compliance for a timely response, to ensure client concerns are being addressed, and so that complaints are handled fairly & effectively. Depending on the concern, certain complaints are escalated to the Canadian Investment Regulatory Organization.

Year	Number of reportable mutual fund related complaints
2024	0
2023	5
2022	1