

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 Advisor team. The Client Relations Advisor team was developed to improve client experience and provide quicker response times. The Client Relations Advisor team works to provide consistent, accurate and quick complaint resolution.

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

Number of reportable complaints	
2021	125
2020	154
2019	166

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 Code of Conduct. Annually all employees and Financial Advisors and their staff must sign and attest to the Codes.
- Our Speak Up hotline is a 24-hour anonymous, secure avenue available in English and French to employees and financial advisors. 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.