

# COMPLAINT MANAGEMENT PROCEDURE

## COMPLAINT MANAGEMENT PROCEDURE FOR CANADIAN POLICYHOLDERS & CUSTOMERS

### COMMITTED TO RESOLVING YOUR CONCERNS

At Chicago Title Insurance Company Canada (“Chicago Title”), we value our customer relationships. Should you be experiencing a problem or concern, please contact us directly. We feel it is important for us to know when problems or concerns exist, so that we may efficiently respond and resolve them to your satisfaction. At the same time, this feedback will enable us to modify our existing practices in order to continue to provide the best possible service to you. Our goal is to handle your concern or complaint in the most efficient, professional and fair manner possible. The below steps ensure your concern or complaint receives the care and attention that it deserves.

### STEP 1: CONTACT US DIRECTLY

For us to handle the issue in the most effective manner possible, please email us your concern or complaint. You are also welcome to mail, call or fax us.

### COMPLAINTS LIAISON

All Provinces and Territories (other than Québec)	Québec
<p><b>Chicago Title Insurance Company Canada</b> Donna Pellicori, Director, Client Services</p> <p><b>By Mail</b> 55 Superior Boulevard Mississauga, ON L5T 2X9</p> <p><b>By E-Mail</b> <a href="mailto:dpellicori@ctic.ca">dpellicori@ctic.ca</a></p> <p><b>By Telephone</b> 1-888-868-4853</p> <p><b>By Facsimile</b> 1-866-214-1953</p>	<p><b>Chicago Title Insurance Company Canada</b> Caroline Émond, Lawyer Director, Underwriting</p> <p><b>By Mail</b> 1, Westmount Square, Tower 1, Suite 446 Westmount, QC, H3Z 2P9</p> <p><b>By E-Mail</b> <a href="mailto:cemond@ctic.ca">cemond@ctic.ca</a></p> <p><b>By Telephone</b> 1-877-849-3113 x42254</p> <p><b>By Facsimile</b> 1-877-339-3773</p>

## STEP 2: CONTACT THE CHICAGO TITLE OMBUDSMAN

If your complaint or concern remains unresolved after proceeding through Step 1 we recommend that you contact the Chicago Title Ombudsman. The Chicago Title Ombudsman is intended to provide an impartial review of your complaint or concern. Within 5 business days of receiving your complaint or concern, the Chicago Title Ombudsman will contact you with information as to if and where your complaint or concern has been redirected, whether it has been resolved, or in more complex situations, what additional steps are being taken. If your complaint or concern remains in unresolved status, you will also be advised as to when you can expect a resolution. You may contact the Chicago Title Ombudsman by:

### OMBUDSMAN

#### Chicago Title Insurance Company Canada

Attention: John Rider, Senior Vice President,  
Retail and Commercial Title Insurance

#### By Mail

55 Superior Boulevard Mississauga, ON L5T 2X9

#### By E-Mail

[jrider@ctic.ca](mailto:jrider@ctic.ca)

#### By Telephone

1-888-868-4853

#### By Facsimile

1-866-214-1953

## STEP 3: CONTACT THE GENERAL INSURANCE OMBUDSERVICE

If, after contact with the Chicago Title Ombudsman, your complaint or concern remains unresolved, you may then contact The General Insurance OmbudService. The General Insurance OmbudService (GIO) is an independent dispute resolution service that is responsive, thorough and focused on the successful resolution of customer complaints.

Any policyholder in Canada who has a concern or dispute with Chicago Title can initiate the process by contacting GIO with the details of his or her complaint. The time to do this is after the customer has first tried to resolve the complaint directly with Chicago Title. Consumers can access GIO's services by telephone, mail, e-mail, fax, or through their web site.

# COMPLAINT MANAGEMENT PROCEDURE

You can initiate the process by telling GIO the details of your complaint. You may register your complaint by telephone at 1-877-225-0446 or with their easy-to-use online complaint form available at [www.giocanada.org](http://www.giocanada.org).

## ADDITIONAL RESOURCES

### All Provinces and Territories

**Financial Consumer Agency of Canada (“FCAC”)** is an agency of the federal government. If you experience delays when using the above-noted process or have other concerns, you may contact FCAC by phone at toll-free at: 1-866-461-3222 or by mail at 427 Laurier Avenue West, 6th Floor, Ottawa, Ontario, K1R 1B9. Additional information about FCAC is available on the internet at [www.fcac-acfc.gc.ca](http://www.fcac-acfc.gc.ca).

### Québec

Autorité des Marchés Financiers (“AMF”) is an agency of the Québec provincial government. If you experience delays when using the above-noted process or have other concerns, you may contact AMF by phone at toll-free at: 1-877-525-0337 or (Québec) 418-525-0337 or (Montréal) 514-395-0337. Additional information about the AMF is available on the internet at [www.lautorite.qc.ca](http://www.lautorite.qc.ca).

## INFORMATION THAT MAY BE REQUIRED BY CHICAGO TITLE

- ✓ Your contact information
- ✓ A summary of the concern or complaint
- ✓ Supporting documentation if necessary
- ✓ The title insurance policy number if applicable

The handling of your concern or complaint will be held strictly confidential and your information will not be shared without your permission. For our Privacy Policy, please go to [www.ctic.ca](http://www.ctic.ca).

## ADDITIONAL INFORMATION FOR THE PROVINCE OF QUÉBEC

### QUÉBEC COMPLAINT EXAMINATION AND DISPUTE RESOLUTION POLICY (“Québec Policy”)

The Québec Policy is adopted by Chicago Title Insurance Company Canada (“Chicago Title”) to comply with the provisions of the Act respecting the distribution of financial products and services.

## 1. Purpose of the policy

The purpose of the Québec Policy is to set up a free and equitable procedure for dealing with complaints. It is also intended to provide oversight for the receipt of complaints, delivery of the acknowledgment of receipt, creation of the complaint file, transfer of this file to the Autorité des Marchés Financiers (“AMF”) and compilation of complaints for the purpose of preparing and filing reports twice a year to the AMF using the Complaint Reporting System (CRS).

## 2. Person in charge

2.1 The person in charge of applying the Québec Policy at Chicago Title is Caroline Émond, Lawyer, Director, Underwriting.

2.2 As the respondent with the AMF and the complainant, this person trains the firm’s staff and provides them with the necessary information for compliance with the Québec Policy.

2.3 The person in charge is also responsible for:

- Delivering an acknowledgment of receipt and notice to the complainant;
- Transferring the file to the AMF, at the complainant’s request;
- Filing a report twice a year with the AMF using the Complaint Reporting System (CRS).

## 3. Complaint

For the purposes of the Québec Policy, a complaint is the expression of at least one of the following three elements:

- A reproach against the registrant;
- The identification of real or potential harm that a customer has sustained or may sustain; or
- A request for remedial action.

Informal steps to correct a specific problem are not considered a complaint, provided the problem is resolved as part of Chicago Title’s normal activities and the customer has not filed a complaint. However, informal steps to correct a specific problem will be considered a complaint if dissatisfaction persists.

## 4. Receipt of the complaint

4.1 Customers who wish to file a complaint must do so, either:

4.1.1 In writing at the address below:

**Chicago Title Insurance Company Canada**

Attention: Caroline Émond, Lawyer, Director, Underwriting

**By Mail**

1, Westmount Square, Tower 1, Suite 446 Westmount, QC, H3Z 2P9

**By E-Mail**

[cemond@ctic.ca](mailto:cemond@ctic.ca)

**By Facsimile**

1-877-339-3773

4.1.2 Verbally

**By Telephone**

1-877-849-3113 x 42254

The verbal complaint will then be documented in order to ensure its retention.

4.2 Any employee who receives a complaint must immediately forward it to the person in charge of the Québec Policy.

4.3 The person in charge must acknowledge receipt of the complaint within five business days of receiving it.

The acknowledgment of receipt must contain the following information:

- A description of the complaint, specifying the real or potential harm, the reproach against Chicago Title and the requested remedial action;
- The name and contact information of the person in charge of examining complaints;
- In the case of an incomplete complaint, a notice requesting more information to which the complainant must respond within 20 business days;
- A copy of the Québec Policy;
- A notice stating that if not satisfied with the outcome or with the examination of the complaint, the complainant can request that the complaint file be transferred to the AMF. This notice must also mention that the AMF may offer dispute resolution services, if deemed appropriate;
- A reminder to the complainant that filing a complaint with the AMF does not interrupt the prescriptive period for civil remedies against Chicago Title.

## 5. Creation of the complaint file

5.1 A separate file must be created for each complaint.

5.2 The file must contain the following:

- The written complaint and its three elements (the reproach against Chicago Title, the real or potential harm and the requested remedial action);
- The outcome of the complaint examination process (the analysis and the supporting documents);
- The final written response to the complainant with justifying reasons.

## 6. Complaint examination

6.1 On receiving a complaint, Chicago Title must initiate its complaint examination process.

6.2 The complaint must be examined within a reasonable period of time, i.e. within 20 business days of receiving all the information necessary for the examination.

6.3 After examining the complaint, the person in charge must send the complainant a final response with justifying reasons.

## 7. Transfer of the file to the AMF

7.1 If not satisfied with the outcome or with the examination of the complaint, the complainant may follow the steps laid out in the above policy applicable to all Canadian customers and contact Chicago Title's ombudsman, and the General Insurance OmbudService. The complainant may also, at any time, ask Chicago Title to transfer the file to the AMF.

7.2 The file transferred to the AMF must include all the information related to the complaint.

7.3 Chicago Title is responsible for complying with the rules governing the protection of personal information.

## 8. Establishment and maintenance of a registry

8.1 The person in charge of the application of the Québec Policy must create and maintain a register of all complaints received.

8.2 Any complaint made in accordance with the definition in Section 3 shall be entered in this register.

## 9. Annual Report

The complaint reports must be filed using the Canadian Council of Insurance Regulators (CCIR) Annual Statement on Market Conduct by May 1 of each year.

## 10. Effective date

This policy came into force before November 2010 and was subsequently amended in October 2018.