

Summary of Banwell Financial Complaint Handling Procedures

As per MFDA Policy No. 3, Banwell Financial has procedures in place to handle any written or verbal complaints received from clients in a fair and prompt manner. This is a summary of those procedures, which we provide to new clients, clients who have filed a complaint, and that we also make available on our website (www.banwellfinancial.com).

The Client Complaint Information Form

We also provide new clients and clients who complain with separate information (or “a separate document”) called the *Client Complaint Information Form* (“CCIF”) that provides general information about their options for making a complaint.

How to File a Complaint with Banwell Financial

Clients wishing to complain to Banwell Financial may make their complaint to our head office by contacting our Compliance Officer (at Head Office) or to any branch manager or to your financial advisor. All complaints are forwarded to qualified complaint or supervisory personnel to be handled. We encourage clients to make their complaint in writing or by email¹ where possible. Where clients have difficulty putting their complaint in writing, they should advise us so that we can provide assistance. For confidentiality reasons, we will only deal with the client or another individual who has the client’s express written authorization to deal with us.

Complaint Handling Procedures

We will acknowledge receipt of complaints promptly, generally within five days. We review all complaints fairly, taking into account all relevant documents and statements obtained from the client, our records, our financial advisor, other staff members and any other relevant source. Once our review is complete, we provide clients with our response, which will be in writing if the complaint was made in writing. Our response may be an offer to resolve your complaint, a denial of the complaint with reasons or another appropriate response. Where the complaint relates to certain serious allegations², our initial acknowledgement will include copies of this summary and the CCIF. Our response will summarize your complaint, our findings and will contain a reminder about your options with the Ombudsman for Banking Services and Investments.

We will generally provide our response with ninety days, unless we are waiting for additional information from you, or the case is novel or very complicated.

We will respond to communications you send us after the date of our response to the extent necessary to implement a resolution or to address any new issues or information you provide.

Settlements

If we offer you a financial settlement, we may ask you to sign a release and waiver for legal reasons.

Contacting Banwell Financial

Clients may contact us at any time to provide further information or to inquire as to the status of their complaint, by contacting the individual handling their complaint or by contacting our Compliance Officer.

¹ Clients who choose to communicate by email should be aware of possible confidentiality issues regarding internet communications.

² As defined in the Policies of the Mutual Fund Dealers Association of Canada of which Banwell Financial is a Member.