SECURIAN CANADA COMPLAINT HANDLING AND DISPUTE RESOLUTION POLICY

1. PURPOSE OF THE POLICY

The purpose of this policy is to outline Securian Canada's Complaint Handling and Dispute Resolution Policy and process.

This policy establishes a framework to ensure that customer complaints are reviewed and resolved fairly by Securian Canada. This includes:

- Providing a complaint processing service that is accessible and easy for customers to use;
- Demonstrating transparency and providing detailed information to customers so they understand how their complaints are handled; and
- Managing complaints, from receipt to resolution, with clear communication on the outcome of Securian Canada's investigation into the complaint.

This policy is also intended to help improve our services by identifying common causes of customer complaints, so the appropriate solutions can be implemented at Securian Canada to correct systemic service delivery issues. This policy is available in both English and French on Securian Canada's website and may be provided in either language upon request by any client or regulatory authority.

2. OUR COMPLAINTS TEAM

Securian Canada's Customer Success Consultant and Complaints Officer ensure the complaints we receive are processed fairly so that:

- Our customers can readily obtain information on how we handle and process their complaints;
- The appropriate staff are handling customer complaints;
- Our staff understand and consistently apply our Complaint Handling and Dispute Resolution Policy and process; and
- Each customer complaint is handled objectively and in a manner that considers the customer's interests.

3. WHAT WE CONSIDER A COMPLAINT

A complaint is defined as a customer's dissatisfaction with respect to a service and/or product Securian Canada or its partners offer and the customer's expectation that we take action to investigate their concerns. Not all customer complaints are considered valid. Below are examples of requests or comments that are not considered valid complaints:

- A request for information or materials regarding a product or service;
- A claim for an indemnity or an insurance claim;
- A request for access to, or amendment of, personal information; or
- Comments or feedback about Securian Canada.

Below are some examples of requests or comments that are considered valid complaints:

- A breach of confidentiality or misuse of customer information
- A complaint or dissatisfaction with the services or products offered by Securian Canada
- Discriminatory treatment or unfair practices
- Failure to properly explain policy terms or fees

4. STEPS IN THE COMPLAINT PROCESS

We process each complaint fairly and objectively, taking into account the customer's interest, and communicate with the customer in clear and plain language. Our customers can file a complaint through one of the following channels:

- Online at: https://www.securiancanada.ca/complaints.html;
- Email at: issueresolution@securiancanada.ca
- Phone at: 1-844-894-0378
- Mail at: Securian Canada
  Attention: Complaint Resolution Program
  PO Box 914 Station A, Toronto, ON, M5W 1G5
- Quebec resident can complete the complaint form from the Autorité des marchés financiers (AMF) at: https://lautorite.qc.ca/fileadmin/lautorite/formulaires/grand-public/GP-plainte_formulaireplainte-an.pdf

5. RECEIPT OF A COMPLAINT

All customer complaints are entered into Securian Canada's complaints register for tracking purposes. We acknowledge receipt of a customer's complaint and ensure that complaints are assigned to the appropriate business leader within 1 business day for investigation.

For residents of Quebec, we inform the customer of their right to have their complaint record examined by the AMF.

6. COMPLAINT HANDLING

Upon receipt of a customer complaint, the Customer Success Consultant will:

- Enter the complaint into Securian Canada's complaints register;
- Engage the appropriate business leader within 1 business day to begin investigating the complaint;
- Ensure an acknowledgement letter has been sent within 2 business days;
- Monitor for resolution of the complaint within 10 calendar days;
- Ensure the outcome of the investigation and associated resolution is summarized in the complaint record; and
- For residents of Quebec, ensure the customer is informed of their right to request to have their complaint record transferred to the AMF within 10 calendar days.

Upon receipt of a customer complaint, the Complaints Officer will:

- Enter the complaint into Securian Canada's complaints register;
- Send a formal letter to the customer within 10 calendar days acknowledging receipt of the complaint;
- Provide the customer with a final written response upon completion of the investigation, including a summary of the complaint and associated findings, as well as the rationale supporting the outcome of the complaint investigation. This correspondence will be sent no later than 60 calendar days following receipt of the complaint. When justified by exceptional circumstances or circumstances beyond the Complaint Officer's control, the Complaints Officer will notify the customer in writing on or before the response date provided in the letter of the acknowledgement that additional time is required to complete the investigation. The additional time may not exceed 30 calendar days.
- If a proposal to settle the dispute, complaint, or issue is presented to the customer, a reasonable timeframe will be provided to allow the customer to assess and respond. Upon acceptance of the resolution offer, Securian Canada must implement it within 30 calendar days, unless an alternative timeframe is agreed upon with the customer.
- Respond to additional inquiries from the customer and/or allow the submission of new or relevant information, until no further action is required to address the complaint.

If the customer does not provide the necessary information or documentation required to investigate the complaint, the Complaints Officer will send a formal letter requesting that the outstanding information/materials be submitted within 10 calendar days. If not received, a final written notice will be sent, informing the customer that the complaint will be closed until the required materials are received.

All complaint records and related correspondence will be retained for a minimum of seven (7) years from the date of final resolution.

7. TRANSFER OF A CUSTOMER COMPLAINT TO THE AMF OR OTHER THIRD-PARTY DISPUTE RESOLUTION ORGANIZATION

If the customer is not satisfied with the final response received from the Complaints Officer, or the way their complaint was handled, they may, at any time, ask the AMF or any other third-party dispute resolution organization applicable to their province of residence to review their complaint.

Securian Canada must send the customer's complaint file to the AMF for investigation within 15 business days of receiving the customer's request. Securian Canada complies with the terms and conditions established under the Quebec applicable regulation and as outlined on the AMF website.

8. EXTERNAL RECOURSE

The Financial Consumer Agency of Canada supervises all federally regulated financial institutions, which includes banks, (financial institutions), for compliance with federal consumer protection laws.

Financial institutions are legally required to have a complaint-handling process in place.

If you have a problem with a financial product or service, you may file a complaint with the responsible financial institution directly.

If you are not satisfied with how your complaint has been handled or 56 days has passed since you made your complaint, you can escalate the complaint to the following External Complaints Body:

Which third party to contact

If you have a life or health insurance policy (underwritten by Canadian Premier Life Insurance Company):

OmbudService for Life & Health Insurance (OLHI)
www.olhi.ca
1-888-295-8112

If you have a property and casualty insurance policy (underwritten by Canadian Premier General Insurance Company):

General Insurance OmbudService (GIO)
www.giocanada.org
1-877-225-0446

If you want to know your rights or need information about the complaint-handling process of a financial institution, you may contact FCAC by online form, mail, or telephone. FCAC uses information from consumer enquiries to support its mandate.

Web site: www.canada.ca/fcac

Online form: https://www.canada.ca/en/financial-consumer-agency/corporate/contact-us.html

Phone:
For service in English: 1-866-461-FCAC (3222)
For service in French: 1-866-461-ACFC (2232)
For calls from outside Canada: 613-960-4666
Teletypewriter (TTY): 1-866-914-6097 / 613-947-7771
Video Relay Service: FCAC welcomes Video Relay Service (VRS) calls. You do not need to authorize the relay service operator to communicate with FCAC. Visit https://srvcanadavrs.ca/en/ to learn more.

Mailing address:
Financial Consumer Agency of Canada
427 Laurier Avenue West, 5th Floor
Ottawa ON K1R 7Y2

For residents of Quebec:

L'Autorité des marchés financiers
https://lautorite.qc.ca/en/general-public/assistance-and-complaints/making-a-complaint
1-877-525-0337

9. EFFECTIVE DATE

This policy is effective July 1, 2025.