Complaint Handling



Canaccord Genuity Corp. ("CGC", "we" and "us") provides a written summary of our complaint handling procedures to new clients at account opening. Canadian Investment Regulatory Organization ("CIRO") regulations govern the processes by which CGC reviews and responds to client complaints.

We are responsible for responding to your feedback effectively and efficiently, and for resolving any complaint you may have regarding your CGC accounts and/or your Investment Advisor. In most cases, a complaint can be resolved by your Investment Advisor or their Branch Manager. However, should you feel your complaint cannot be resolved by your Investment Advisor or their Branch Manager, contact our Designated Complaints Officer ("DCO") directly at:

Canaccord Genuity Corp. C/O Designated Complaints Officer 1133 Melville Street, Suite 1200 Vancouver, BC Canada V6E 4E5 Or by telephone at: 604-643-7300

The DCO is responsible for acknowledging your complaint within 5 business days of its receipt. The acknowledgement letter will include the contact information of the person handling your complaint, a summary of our complaint handling procedures, the timeframe in which you can expect to receive a substantive response to your complaint and the escalation steps available to you should you remain dissatisfied with our complaint examination findings. Included with the letter will also be a copy of CIRO's "How to Make a Complaint" pamphlet.

Upon completion of our review, the substantive response letter we send to you will include a summary of your complaint, results of our investigation and an explanation of our decision. We will provide a final decision with respect to a complaint within 90 days, or an interim response with an explanation for the delay and the expected new response time.

Our final response concerning any complaint will include information regarding your available options to escalate your complaint should you be dissatisfied with our decision which includes contacting CIRO's free dispute resolution service.

For residents of Quebec, you may request that your complaint file be transferred to the Autorité des marchés financiers ("AMF") following receipt of our final decision or the expiry of the time limit of 90 days. However, this request must be submitted no later than one year after the date you have obtained our final response. The AMF offers mediation services that are free of charge, impartial, quick and voluntary and may be used to attempt to resolve disputes within the AMF's jurisdiction.

You may also submit your complaint to the Ombudsman for Banking Services and Investments ("OBSI") if you have not received a written notice of decision after 90 days from the date you submitted your complaint. Also, if you are not satisfied with the outcome of the review of the complaint by CGC, you may escalate your concerns directly to the OBSI within 180 days from the date of CGC's response letter to you. The services of OBSI are free.

For further information, please refer to CIRO's pamphlet "How to Make a Complaint", a copy of which is provided at the time of account opening or contact our office at Canaccord Genuity Corp. 1133 Melville Street, Suite 1200 Vancouver, BC V6E 4E5 Attention: Compliance, Designated Complaints Officer.

A more detailed description of CGC's policies and procedures surrounding the complaint handling procedures is included below.

A "complaint" is deemed to include an alleged grievance involving CGC or an employee. Examples of a complaint may include:

- Any written statement, including email or fax, of a client, or any person acting on behalf of a client;
- Any written or verbal statement from any person alleging: theft, fraud, misappropriation of funds or securities, forgery, money laundering, market manipulation, insider trading, misrepresentation, or unauthorized trading; or
- Any other verbal complaint from a client that will warrant the same treatment as a written complaint.
- If the complaint (written or verbal) is deemed to be "service-related", the complaint may be handled directly by the applicable CGC supervisor or manager. All securities-related complaints are handled by the DCO or by qualified Compliance staff.
- Upon receipt of a verbal statement, if the complaint is deemed to be "regulatory-related" CGC will request that the client or individual (or person lawfully acting on behalf of the client or individual) provide particulars of the complaint to CGC in writing. CGC's request for a written complaint may be made verbally or in writing.

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- Upon receipt of a written or verbal complaint, CGC's Compliance Department will immediately record the complaint in the internal compliance complaint log and send the complaint acknowledgment letter within five (5) business days of receipt of the complaint.
- The Compliance Department will contact the individuals involved in the complaint and, where appropriate and/or possible, request their information and documentation relating to the matter. Where the complaint involves allegations of serious misconduct or is a legal action, CGC's Compliance Department will ensure that senior management is aware of the complaint.
- CGC's Compliance Department will begin its investigation of the allegations raised in the complaint and communicate the findings/results within 90 days of receipt of the written complaint. With respect to the investigation, CGC's Compliance Department will gather the facts, information and documentation in order to properly analyze and consider the complaint.
- Once the investigation has been completed, the response letter will be prepared. Depending on the nature of the complaint, the response will be reviewed by the DCO and/or CGC's Legal Counsel if deemed necessary.

"Service–related" complaints are those complaints which are founded on customer service issues and which are not the subject of:

- Any legislation or law concerning securities or exchange contracts of any jurisdictions, inside or outside of Canada;
- By-laws, rules, regulations, rulings or policies of any securities or financial services regulatory or self-regulatory organization in any jurisdiction.

"Regulatory-related" complaints are those complaints concerning:

- Any matter related to securities or exchange contracts;
- Any matter related to the handling of client accounts or dealings with clients;
- Any matter that is the subject of any legislation or law concerning securities or exchange contracts of any jurisdiction, inside or outside of Canada; or
- Any matter that is the subject of by-laws, rules, regulations, rulings or policies of any securities or self-regulatory organization in any jurisdiction.

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