



# Policy Summary— Complaint Handling Procedures

PEAK Investment Services Inc. ("PEAK") has implemented procedures to handle both written and verbal complaints from clients in a fair and timely manner. This document provides a summary of these procedures as well as general information about the available options for filing a complaint. It is provided to new clients and existing clients who have submitted a complaint. It is also available on our website: [www.peakgroup.com](http://www.peakgroup.com).

## HOW TO FILE A COMPLAINT

Clients may file a complaint by contacting PEAK's head office by email at [compliance@peakgroup.com](mailto:compliance@peakgroup.com)\*, a branch manager, or their representative. All complaints are forwarded to qualified compliance personnel. PEAK encourages clients to submit complaints in writing or via secure email. Clients who require assistance in formulating or drafting their complaint may contact PEAK at any time for support.

For Quebec residents, complaints may also be submitted using the form provided by the AMF, available online at: [https://lautorite.qc.ca/fileadmin/lautorite/formulaires/grand-public/GP-plainte\\_formulaire-plainte-an.pdf](https://lautorite.qc.ca/fileadmin/lautorite/formulaires/grand-public/GP-plainte_formulaire-plainte-an.pdf)

For confidentiality reasons, PEAK will only communicate with the client or any other person designated by written authorization from the concerned client.

## COMPLAINT HANDLING PROCEDURE

Within five (5) business days of receiving a complaint, PEAK will send an acknowledgment of receipt, including the contact information of the person responsible for handling the complaint file. Clients may contact this person at any time for more information or updates.

PEAK reviews all complaints in a fair and impartial manner, taking into account all relevant

documents, client statements, representative input, and any other relevant sources. Once the review is completed, PEAK will provide the client with a written response, which includes a summary of the information reviewed, the findings of the investigation, a proposed resolution, a dismissal with explanation, or another appropriate response, along with a reminder of the client's options with competent regulatory authorities.

PEAK generally provides a response within 90 days.

In Quebec, regulations require PEAK to issue a final response within 60 days of receiving the complaint. However, in exceptional circumstances beyond our control (e.g., inability to obtain essential information or documentation in a timely manner, delays caused by third parties, personal or medical issues, or an unusually high volume of complaints being processed simultaneously), this deadline may be extended to 90 days.

PEAK will continue to respond to client communications after its final response, if necessary, to finalize the resolution or to address any new issues.

## SETTLEMENT

If a financial settlement is offered, PEAK may request that the client sign a legal release and waiver.

## CONTACTING PEAK

Clients may contact PEAK at any time to provide additional information or to inquire about the status of their complaint by contacting the person handling their file or by writing to: [compliance@peakgroup.com](mailto:compliance@peakgroup.com)\*.

## OTHER OPTIONS FOR COMPLAINT RESOLUTION

If you are not satisfied with the outcome of the review of your complaint, several options are available to you.

### **Requesting a Review by PEAK**

Clients may request a review of the file by submitting a reply indicating points they believe were not considered. PEAK will make necessary adjustments and respond to further communications

to reach a fair and final resolution.

### **L'Autorité des Marchés Financiers ("AMF")**

If you reside in Quebec and are not satisfied with PEAK's final decision or with the handling of your complaint, you may request that your file be transferred to the Autorité des marchés financiers (AMF).

This request can be made verbally, in writing, or using the transfer form on the AMF website. Upon such a request, PEAK is required to forward the entire file to the AMF within 15 days.

The AMF may, if appropriate, offer dispute resolution services such as mediation or conciliation. It may also review the matter within the scope of its regulatory oversight.

If you believe you are a victim of fraud, deceitful conduct, or misappropriation of funds, you may contact the AMF to find out whether you are eligible to file a claim with the Financial Services Compensation Fund. The maximum compensation is \$200,000 and is payable from the amounts accumulated in the fund if the claim is deemed eligible.

For more information or to access the transfer form, please visit the AMF website: <https://lautorite.qc.ca/en/general-public/assistance-and-complaints> or call the AMF at 418-525-0337 (in Quebec City) or toll-free at 1-877-525-0337.

### **Canadian Investment Regulatory Organization ("CIRO")**

You may submit your complaint to CIRO at any time, even if you have already submitted it to your representative or to PEAK. To do so, please refer to CIRO's document titled "Making a Complaint," attached to this summary.

### **Ombudsman for Banking Services and Investments ("OBSI")**

PEAK participates in the dispute resolution services offered by OBSI. OBSI provides an independent and impartial process for reviewing and resolving complaints related to the delivery of financial services to clients.

You may submit your complaint to OBSI if you are dissatisfied with PEAK's response or if PEAK has not responded to your complaint within 90 days from the date it was submitted (or 60 days for clients in Quebec, per AMF regulations). Please note that you have 180 calendar days after PEAK's response to submit your complaint to OBSI.

OBSI may make a non-binding recommendation that PEAK compensate you (up to \$350,000) if it determines you were treated unfairly, based on criteria such as the quality of financial services and of commercial practices, industry codes of conduct, and relevant laws. OBSI's services are free and confidential.

OBSI can be contacted:

- by phone at 416-287-2877 (in Toronto) or toll-free at 1-888-451-4519;
- by email at [ombudsman@obsi.ca](mailto:ombudsman@obsi.ca);
- by fax at 1-888-422-2865.

### **Legal Assistance**

You may wish to consider retaining the services of a lawyer to advise you regarding your complaint. You should be aware that there are legal time limits to initiate court proceedings. A lawyer can advise you on your rights and legal options. Once the applicable limitation period has expired, you may lose the right to take legal action. If you choose to initiate a lawsuit, the bar association in your province can help you find a lawyer. A list of provincial law societies is available at: [www.flsc.ca](http://www.flsc.ca)

### **Manitoba, New Brunswick, and Saskatchewan**

Securities regulators in these provinces have the authority, in certain situations, to order an individual or a company that has violated provincial securities laws to compensate a complainant. The complainant can then enforce such an order as though it were a judgment from the Superior Court of that province.

For more information, you may visit the following websites:

- Manitoba: [www.msc.gov.mb.ca](http://www.msc.gov.mb.ca)
- New Brunswick: <https://fcnb.ca/en>
- Saskatchewan: [www.fcaa.gov.sk.ca](http://www.fcaa.gov.sk.ca)

*\* You must consider security risks when sending sensitive information by email.*



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# How to Make A Complaint





Here is what you need to know if you have a complaint about your advisor or investment firm regulated by CIRO.

### **You Can Make a Complaint to Your Investment Firm**

Clients of a firm regulated by CIRO who are not satisfied with a financial product or service can make a complaint to the firm and seek resolution of the problem. The firm must follow our rules for handling client complaints and address your complaint promptly and fairly. You can find your firm's contact information on your account statement and your firm's complaint handling procedures on their website.

### **About CIRO**

CIRO regulates the activities of Canadian investment dealers and mutual fund dealers and the advisors they employ. CIRO sets rules for the firms and advisors we regulate and monitors the trading activity on all Canadian marketplaces. We can take disciplinary action if firms or their advisors break our rules. CIRO is overseen by the provincial and territorial securities regulators.

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Learn more at [ciro.ca](https://www.ciro.ca) about how to make a complaint, where you can get help and your options for seeking compensation.



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## You Can Also Complain Directly to CIRO





If you feel there has been misconduct in the handling of your account we want to hear from you. You can complain to CIRO directly and we can investigate to determine if your advisor or firm has broken our rules and, if necessary, take disciplinary action. Disciplinary action can include fines or suspensions for firms or advisors that have broken our rules. You can make a complaint to CIRO, at any time, whether or not you have complained to your firm. However, CIRO does not order compensation to investors. If you are seeking compensation, the first step is to make a complaint to your investment firm. You can also consider the options described on the pages that follow.

We can be contacted by:

- 1 Completing the easy and convenient online complaint form at [ciro.ca](http://ciro.ca)
- 2 By email at [info@ciro.ca](mailto:info@ciro.ca)
- 3 By telephone at 1-877-442-4322
- 4 Fax at 1-888-497-6172
- 5 40 Temperance Street, Suite 2600  
Toronto, ON M5H 0B4

## Examples of Complaints We Investigate

Your firm or advisor:

-  Recommended investments that were too risky for you;
-  Made trades in your account without your permission or used your funds in ways that you were unaware of;
-  Charged you fees that were not explained to you;
-  Signed forms on your behalf without your knowledge.

## If You Are Seeking Compensation You Have Options

### The Ombudsman for Banking Services and Investments (OBSI)

If you do not receive a response from your investment firm within 90 days or you are not satisfied with the firm's response you can go directly to OBSI. OBSI is Canada's free, independent and impartial service for resolving investment and banking disputes with participating firms. CIRO requires all the investment firms it regulates to take part in the OBSI process. OBSI can recommend compensation up to \$350,000, but currently its decisions are not legally binding. **You have 180 days to bring your complaint to OBSI after receiving a response from your investment firm. If your firm has not responded within 90 days, then you can take your complaint to OBSI without your firm's response.**

You can contact OBSI at:

- 1 1-888-451-4519
- 2 [ombudsman@obsi.ca](mailto:ombudsman@obsi.ca)
- 3 [obsi.ca](http://obsi.ca)
- 4 20 Queen Street West, Suite 2400  
P.O. Box 8  
Toronto, ON M5H 3R3



### Other Options

#### Going to Court

You can hire a lawyer to take legal action or to assist you with your complaint, however this can be an expensive option. There are also time limits on legal action, which vary by province or territory. Once the time limit expires you may not be able to pursue your claim.

#### Arbitration

Arbitration is a process where a qualified arbitrator, chosen in consultation with both you and the investment firm, hears both sides and makes a final, legally binding decision about your complaint. This option is available if your CIRO firm is an investment dealer. There are costs to using arbitration, though often less than going to court. The arbitrator acts like a judge and reviews facts presented by each side of the dispute. Either side can choose to be represented by a lawyer, though this is not required. Arbitrators in the CIRO arbitration program can award up to \$500,000.



## Provincial and Territorial Securities Regulators

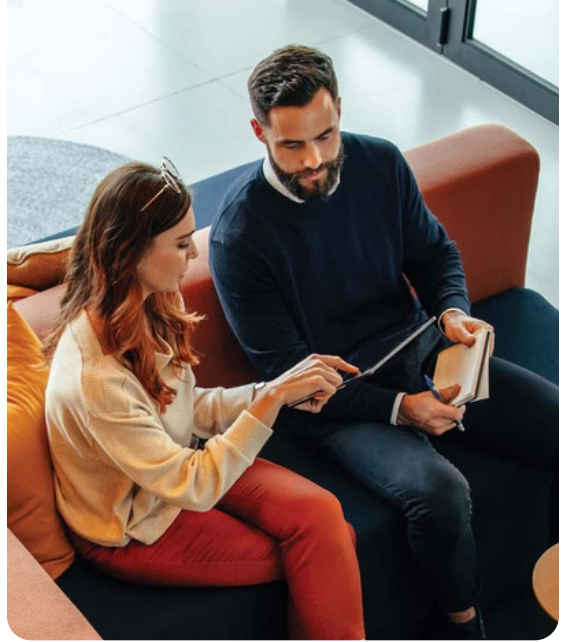
### Quebec

If you live in Quebec, in addition to the options previously described, you can use the free services of the **Autorité des marchés financiers** (AMF). If you are dissatisfied with the firm's handling of the complaint or the outcome, you can request to have the complaint examined by the AMF. The AMF will assess the complaint and may offer conciliation and mediation services, though firms are not required to participate.

If you think you are a victim of fraud, fraudulent tactics or embezzlement, you can contact the AMF to see if you meet the eligibility to submit a claim to the Fonds d'indemnisation des services financiers ("Financial Services Compensation Fund"). Up to \$200,000 can be payable for an eligible claim.

For more information on the AMF:

- 1 1-877-525-0337
- 2 [lautorite.qc.ca/en](http://lautorite.qc.ca/en)



### Other Provinces or Territories

Some provincial or territorial securities regulators can, *in certain cases*, seek an order that a person or company that has broken securities law pay compensation to harmed investors who make a claim. These orders are enforced similar to court judgments.

Access the link to your provincial or territorial securities regulator by visiting the following Canadian Securities Administrators page: **[securities-administrators.ca/about/contact-us](https://securities-administrators.ca/about/contact-us)**



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Your complaint matters. It helps to ensure you are treated fairly and can help CIRO better protect investors now and in the future.

Learn more about how to make a complaint, where you can get help and your options for seeking compensation.



**ciro.ca**