INDEMNITY NATIONAL INSURANCE COMPANY (CANADA BRANCH)

Consumer Complaints-Handling Procedure

DECEMBER 2025

INTRODUCTION

The Canadian branch of Indemnity National Insurance Company ("**INIC**") is licensed by the Office of the Superintendent of Financial Institutions ("**OSFI**") to insure in Canada risks.

INIC has adopted this Consumer Complaints-Handling Procedure ("**Procedure**") to standardize the management of complaints and establish a fair and transparent complaints-handling process for our insureds. This Procedure is applicable to all written and oral complaints received regarding INIC insurance products or services distributed in all Canadian provinces and territories in which INIC is licensed and conducts business.

INIC will consider and reasonably investigate all complaints received, not only those related to a potential violation or infringement of laws and regulations.

INIC is committed to providing the best possible service to its insureds. As a result, we have taken all necessary measures to inform our employees of this Procedure, and continue to do so on an ongoing basis.

COMPLAINT DEFINITION

A complaint is the expression of at least one of the following situations that exists after being considered and examined at the operational level capable of making a decision on the matter:

- a reproach against an organization;
- the identification of a real or potential harm that a consumer has experienced or may experience; or
- a request for a remedial action.

The initial expression of dissatisfaction by an insured, whether in writing or otherwise, will not be considered a complaint where the issue is settled in the ordinary course of business; however, in the event the insured remains dissatisfied and such dissatisfaction is escalated or referred to the supervisor or manager who is responsible for the examination of complaints, then it will be considered as a complaint.

INIC will refrain from any undue delay in referring a matter to a higher level solely for the purpose of avoiding reporting requirements.

COMPLAINTS HANDLING

Where an insured remains dissatisfied after a reasonable attempt has been made to settle the issue, we will then consider to have received a complaint.

Insureds also have the option of reporting complaints directly to the Financial Consumer Agency of Canada (the "**FCAC**"). FCAC will ask for details about your complaint to help determine if it falls within its mandate. For instance, whether the complaint is about an entity FCAC supervises and whether the complaint relates to the entity not meeting a market conduct obligation (as FCAC examines complaints about financial institutions that relate to market conduct obligations).

LODGING A COMPLAINT

We want to hear from our insureds who are not completely satisfied with the products or services they receive from us. If you are unsatisfied with any of INIC's Insurance products or services, please see below for your many options.

Step 1: Contact Your Broker

In most circumstances, your concerns may be resolved with a simple explanation provided by your independent insurance broker.

Step 2: Contact Your INIC Representative

If you are still not satisfied after speaking with your broker, you may contact your INIC representative by telephone, mail, facsimile, or email. INIC's contact information is available below.

If you know the name of the INIC's representative responsible for your file, please contact that person directly. If you are unsure of the INIC representative's name, your broker will be able to provide you with this information. After speaking with the INIC representative responsible for your file, that INIC representative will forward your complaint appropriately to Daniel Waxman (Senior V.P. & General Counsel at INIC).

Depending on its type and nature, your complaint may be referred to and handled directly by INIC's management.

In any case, once we receive it, we will open a file for your complaint and log it into our system. The file will contain your written complaint and will be updated as the resolution process progresses, including any information regarding the progress of the resolution process, its outcome and our final written answer to you.

The INIC representative will make all reasonable efforts to resolve the complaint to your satisfaction.

If we are unable to resolve your complaint within five business days of us receiving it, we will let you know by sending you an acknowledgement of receipt. The purpose of our acknowledgement to you in this case is to inform you of:

- the contact information for the INIC representative responsible for handling your complaint; and
- the estimated time required to respond to your complaint.

Please note that, while an INIC representative will be assigned to handle your complaint, INIC's Ombudsman is ultimately responsible for all complaints. If you are not satisfied with our handling of your complaint at this **Step 2**, you will be referred to the relevant INIC manager who will review your complaint.

Step 3: Contact INIC's Ombudsman and Consumer Complaints Officer

If your complaint cannot be resolved at our operational level (**Step 2**) or you are not satisfied with the outcome of your complaint at the operational level, you may choose to contact our Ombudsman and Consumer Complaints Officer. The FCAC is a Canada-wide independent government body that regulates consumer provisions relating to financial services, including insurance.

The Ombudsman and Consumer Complaints Officer is an INIC employee who acts as liaison between you and INIC and is the person ultimately responsible for implementing this Procedure. This individual may be reached at the following:

Ombudsman and Consumer Complaints Officer – Daniel Waxman (Senior V.P. & General Counsel)

Indemnity National Insurance Company
3630-81 Bay Street,
PO Box 19
Toronto, ON, M5J 0E7

Direct dial: 647-531-KEWA (5392)
Email: complaints@kewafinancial.com
indemnitynational.com

When you file a complaint with the Ombudsman and Consumer Complaints Officer,

- your file and complaint is reviewed,
- your position and the handling of your complaint is discussed with the appropriate INIC personnel, and
- a suggestion is made to resolve the issue in a fair and satisfactory manner.

If you request to speak with our Ombudsman and Consumer Complaints Officer, the Ombudsman and Consumer Complaints Officer will assess the nature of your complaint and either handle it or refer it to the appropriate department or designated INIC representative, then follow up on the file at a later date.

After your file is investigated, if we are unable to resolve your complaint to your satisfaction, the Ombudsman and Consumer Complaints Officer will ask the appropriate INIC department manager handling your complaint to prepare a final position letter, a copy of which will be sent to you and your broker. Unless INIC and you agree to extend the time period, INIC must send the final position letter to you and your broker within 30 days of the date the complaint is received. In addition, we will include in the letter instructions on how to file a complaint with the General Insurance OmbudService and the appropriate regulatory authority.

<u>Step 4:</u> Contact the General Insurance OmbudService and/or the Financial Consumer Agency of Canada

All Provinces and Territories (other than Quebec):

The General Insurance OmbudService ("**GIO**") is an independent organization, with the sole purpose of helping Canadian consumers resolve disputes or concerns with their insurers by providing a dispute resolution system for the insurance industry.

You may contact the GIO as follows:

General Insurance OmbudService

4711 Yonge Street, 10th Floor
Toronto, ON M2N 6K8

Toll-Free: 1.877.225.0446
Fax: 416-299-4261
Email : info@giocanada.org
Website: www.giocanada.org[1]

Upon request, the INIC Ombudsman shall provide the file, including all documents regarding the complaint, to the GIO. The file shall be transferred to the GIO in a manner that protects the personal information contained in such file.

All Provinces and Territories:

You may also choose to contact the Financial Consumer Agency of Canada ("**FCAC**") if you are not satisfied with the way the complaint has been handled or INIC's final position received. The FCAC is a Canada-wide independent government body that regulates consumer provisions relating to financial services, including insurance. If you have a complaint regarding this Procedure or a consumer provision, you may raise these concerns with the FCAC. Please keep in mind that FCAC is not a dispute resolution agency and cannot act on your behalf to contact your financial institution. The FCAC does not resolve individual disputes and does not provide redress or compensation.

You may contact the FCAC as follows:

Financial Consumer Agency of Canada
427 Laurier Avenue West, 5th Floor
Ottawa, ON K1R 1B9

Toll-Free: 1.866.461.3222 (English); 1.866.461.2232 (French)
TTY: 1.866.914.6097

Our Ombudsman and Consumer Complaints Officer will provide answers to any questions posed by the FCAC, the GIO or any other appointed mediator in their investigations.

Step 5: Consult your Provincial Superintendent of Insurance or Relevant Provincial Authority

If you wish to consult your provincial regulatory authority before you contact us or if you are not satisfied with the way your complaint has been handled by us or by the way it has been settled by us, you may ask us to transfer your file to your regulatory authority.

[1] You may choose to file a complaint with the GIO online at https://giocanada.org/submit-a-complaint-2/

ALBERTA Alberta Superintendent of Insurance Alberta Treasury Board and Finance Financial Sector Regulation and Policy 402 Terrace Building 9515 107 Street Edmonton, AB T5K 2C3 Phone: 780.643.2237 Toll-free : 310.0000.780.643.2237 Fax: 780.420.0752 Email: tbf.insurance@gov.ab.ca Website: www.alberta.ca/insurance	**BRITISH COLUMBIA** Superintendent of Financial Institutions BC Financial Services Authority 600 - 750 West Pender Street Vancouver, BC V6C 2T8 Phone: 604.660.3555 Toll-free:1.866.206.3030 Email: insurance@bcfsa.ca Website:www.bcfsa.ca/
MANITOBA Superintendent of Financial Institutions Financial Institutions Regulation Branch 500 - 400 St. Mary Avenue Winnipeg, MB R3C 4K5 Phone: 204.945.2542 Fax: 204.945.0330 Toll-free: 1.800.282.8069 (in Manitoba) Email: insurance@gov.mb.ca Website:www.mbfinancialinstitutions.ca/insurance/index.html	**NEW BRUNSWICK** Superintendent of Insurance Financial and Consumer Services Commission of New Brunswick 200 - 225 King Street Fredericton, NB E3B 1E1 Toll-free: 1.866.933.2222 Email: insurance.compliance@fcnb.ca Website:https://www.fcnb.ca/en/online-services/submit-a-complaint
NEWFOUNDLAND AND LABRADOR Superintendent of Insurance Digital Government and Service NL Confederation Building - West Block 2nd Floor P.O. Box 8700 St. John's, NL A1B 4J6 Phone: 709.729.4834 Fax: 709.729.3205 Email: fsrd@gov.nl.ca Website:www.gov.nl.ca/dgsnl	**NORTHWEST TERRITORIES** Superintendent of Insurance Government of the Northwest Territories P.O. Box 1320; YK-3 Yellowknife, NT X1A 2L9 Phone: 867.767.9171 Fax: 867.920.6133 Email : Superintendent_Insurance@gov.nt.ca Website:www.fin.gov.nt.ca
NOVA SCOTIA Nova Scotia Department of Finance and Treasury Board Financial Institutions Division Office of the Superintendent of Insurance Provincial Building, 5th floor 1723 Hollis Street Halifax, NS B3J 1V9 Phone: 902.424.5613 Fax: 902.424.1298 Email: fininst@novascotia.ca Website: https://beta.novascotia.ca/contact/finance-and-treasury-board	**ONTARIO** Financial Services Regulatory Authority of Ontario 100 - 25 Sheppard Avenue West Toronto, ON M2N 6S6 Phone: 416.250.7250 Toll-Free: 1.800.668.0128 TTY: 1.800.387.0584 Email: contactcentre@fsrao.ca Website: www.fsrao.ca

PRINCE EDWARD ISLAND Superintendent of Insurance Financial and Consumer Services Division Shaw Building, 1st Floor North 105 Rochford Street P.O. Box 2000 Charlottetown, PE C1A 7N8 Phone: 902.368.4550 Fax: 902.368.5283 Email : licensing@gov.pe.ca Website :https://www.princeedwardisland.ca/en/information/insurance-regulation	**SASKATCHEWAN** Superintendent of Insurance Insurance and Real Estate Division Financial and Consumer Affairs Authority 2365 Albert Street, 4th Floor Regina, SK S4P 4K1 Phone: 306.787.6700 Fax: 306.787.9006 Email: fid@gov.sk.ca Website: www.fcaa.gov.sk.ca
YUKON Superintendent of Insurance Community Services Box 2703 (C-5) Whitehorse, YT Y1A 2C6 Phone: 867.667.5111 Fax: 867.667.3609 Email: insurance.plra@yukon.ca Website:www.gov.yk.ca	**NUNAVUT** Office of the Superintendent of Insurance Department of Finance P.O. Box 2260 Iqaluit, NU X0A 0H0 Phone: 1.800.316.3324 Email: insurance@gov.nu.ca Website: www.gov.nu.ca

After receiving your complaint, your appropriate regulatory authority will analyze it and, if considered appropriate, may suggest mediation. Mediation is a settlement process in which a neutral third party (a mediator) intervenes to facilitate an amicable resolution that satisfies both parties.

Our Ombudsman and Consumer Complaints Officer will fully cooperate with the regulatory authority or the mediator by providing any additional information that may be required. Once the regulatory authority has come to a decision, our Ombudsman and Consumer Complaints Officer will provide the INIC department manager with a copy of the decision.