

# Complaint Handling Procedures

The following outlines Manulife Securities Investment Services Inc. (“Manulife Securities”) policies and procedures for dealing with complaints to ensure that complaints are dealt with promptly and fairly.

A “complaint” is deemed to include an alleged grievance involving Manulife Securities or a Manulife Securities Financial Advisor in the form of:

- (a) any written statement, including electronic communications, of a client, or any person acting on behalf of a client, or of a prospective client involving matters that occurred while the Financial Advisor was an Approved Person of Manulife Securities;
- (b) any written or verbal statement from any person alleging:
  - i. theft, fraud, misappropriation of funds or securities, forgery, money laundering, market manipulation, insider trading, misrepresentation, or unauthorized trading;
  - ii. securities related business outside of Manulife Securities;
  - iii. an undeclared occupation outside of Manulife Securities;
  - iv. personal financial dealings with a client;
- (c) any other verbal statement of grievance from a client for which the nature and severity of the client’s allegations will warrant, in the professional judgment of Manulife Securities’ supervisory staff handling the complaint, the same treatment as a written complaint.

Complaints should be sent to:

Manulife Securities Investment Services Inc.  
1375 Kerns Road  
P.O. Box 5083  
Burlington, Ontario  
L7R 0A8  
Attention: **Manager, Complaints and Regulatory Investigations**  
Tel: **1-888-487-1655 ext. 283385**  
Email: **Compliance@manulifesecurities.ca**

To ensure that Manulife Securities provides an equitable process for the handling of complaints, the following process has been established:

1. Upon receipt of a verbal statement or written complaint, if the complaint is deemed to be “service-related”<sup>1</sup>, the complaint may be handled directly by the applicable Manulife Securities Branch Manager. All securities-related<sup>2</sup>, complaints are handled by qualified Compliance staff. All service-related complaints are handled by Branch Managers or the Manager of Operations as applicable.
2. Upon receipt of a verbal statement, if the complaint is deemed to be “securities-related” Manulife Securities will request that the client or individual (or person lawfully acting on behalf of the client or individual) provide particulars of the complaint to Manulife Securities in writing. Manulife Securities’ request for a written complaint may be made verbally or in writing. In the case of verbal statements in the nature of (b) and (c) of the definition of “complaint” above, these matters will be internally investigated by Manulife Securities in accordance with the procedures established below and prior to its receipt of a written complaint.
3. Upon receipt of a written complaint or a verbal statement of grievance in the nature of (b) and (c) of the definition of “complaint” above, Manulife Securities’ Compliance Department will (i) immediately record the complaint in the complaint log; and (ii) send an initial response letter in the form attached as Schedule “A” within five (5) business days of receipt of the written complaint.
4. Manulife Securities will notify the applicable Manulife Securities Financial Advisor and Branch Manager of the complaint and, where appropriate and/or possible, request their information and documentation with respect to the complaint. Where the complaint involves allegations of serious misconduct or is a legal action, Manulife Securities’ Compliance Department will make senior management aware of the complaint.
5. Manulife Securities’ Compliance Department will commence its investigation and analysis of the allegations raised in the complaint with a view to providing the substantive response to the client or individual within 90 days of receipt of the written complaint. With respect to the investigation and analysis, Manulife Securities’ Compliance Department will gather the facts, information and documentation where possible from the applicable and/or available sources within Manulife Securities and/or elsewhere and objectively consider the complaint. Complaints will not be dismissed based on any predetermined factors, rather each complaint will be considered individually on its own merits. In gathering the facts, Manulife Securities may contact the client or individual to request additional information required to resolve the complaint.

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<sup>1</sup> “Service-related” complaints are those complaints which are founded on customer service issues and which are not the subject of:

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

<sup>2</sup> “Securities-related” complaints are those complaints concerning:

- (i) any matter related to securities or exchange contracts;
- (ii) any matter related to the handling of client accounts or dealings with clients;
- (iii) 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
- (iv) any matter that is the subject of by-laws, rules, regulations, rulings or policies of any securities or financial services regulatory or self-regulatory organization in any jurisdiction, inside or outside of Canada.

6. In the event that the investigation and analysis of the allegations raised in the complaint is taking longer than 6 months (for example where Manulife Securities has requested additional information which was not forthcoming within a reasonable time period and/or where there is an extensive amount of fact-finding or complex legal or other analysis), Manulife Securities' Compliance Department will communicate with the client or individual to keep him or her apprised of the status of the investigation with an explanation for the delay and a best estimate of the time required for the completion of the substantive response.
7. Once the investigation has been completed, the substantive response letter will be prepared. Depending on the nature of the alleged grievance, the proposed response will be reviewed by the Director, National Compliance, Chief Compliance Officer and/or Manulife Securities' Chief Counsel.
8. Each substantive response letter will include an outline of the complaint and Manulife Securities' substantive decision on the complaint, including the reasons for the decision. Each substantive response letter will also contain the following paragraph:

"We remind you that you have the right to consider (i) presenting your complaint to the Ombudsman for Banking Services and Investments which will consider complaints brought to it within 6 months of this letter; (ii) making a complaint to the Mutual Fund Dealers Association of Canada ("MFDA") or (iii) litigation/civil action. In accordance with MFDA regulations, we are enclosing a document entitled "Client Complaint Information" (a copy of this document was also provided to you with our letter dated **[insert date of acknowledgement letter]**).

9. Manulife Securities' substantive response letter will be sent to the client by regular letter mail or, in some instances, by courier. Manulife Securities will continue to proactively address further communication from the client or individual as appropriate in a timely manner until no further action is deemed to be required by Manulife Securities in its professional judgment.

**[MANULIFE SECURITIES INVESTMENT SERVICES INC. LETTERHEAD]**

**[Date]**

**[Client Name  
Address]**

Dear Client Name:

Manulife Securities Investment Services Inc. ("Manulife Securities") acknowledges receipt on **[Month, Day, Year]** of your letter of complaint dated **[Month, Day, Year]**.

We are investigating your complaint and will respond to you with the results of our investigation. Manulife Securities endeavours to provide substantive responses to client complaints within 90 days of receipt. This timeline may be extended where we have requested additional information from you or if your complaint requires an extensive amount of fact-finding or complex legal analysis. In instances where the timeline is extended, Manulife Securities will keep you apprised of the status of your complaint.

**[Include request for any additional reasonable information required to resolve the complaint if known at this time]**

If at any time you would like to inquire about the status of your complaint or provide Manulife Securities with any additional information or documentation relating to your complaint, please feel free to contact me at the mailing address noted below, by **[telephone, fax and e-mail co-ordinates]**.

For your reference, please find enclosed a document entitled "Complaint Handling Procedures" outlining Manulife Securities' internal complaint handling process.

In accordance with MFDA regulations, please find enclosed a document entitled "Client Complaint Information".

Yours truly,

**[Name]**  
Manager, Complaints and Regulatory Investigations

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