

LWIC Complaint Handling Policy for Quebec Clients (effective as of July 1, 2025)

What is a Complaint?

- A “complaint” refers to a formal or informal complaint from a client of Leith Wheeler that:
 - Is an expression of dissatisfaction or reproach about a product or service offered by Leith Wheeler where the client expects a final response, and
 - is received by Leith Wheeler within 6 years of the day when the client first knew or reasonably ought to have known of an act or omission that is a cause of or contributed to the complaint.
- The following are not considered complaints for purposes of this Policy:
 - a request made for information or materials in respect of an offered product or service;
 - a request for access or rectification made in accordance with the *Act respecting the protection of personal information in the private sector*;
 - a claim for an indemnity or any other insurance claim;
 - a request for correction of a clerical error or mistake in calculation, unless further action must be taken to address the consequences of the error or mistake for the person making the request, a member of the clientele, or any other person concerned by a record;
 - communication of a comment or feedback.

Filing a Complaint

- You can file a complaint either verbally or in writing, to your Leith Wheeler portfolio manager or to info@leithwheeler.com (please put “complaint” in the subject line) and the portfolio manager or another employee will assist you, if necessary, in formulating your complaint.
- Once we receive your complaint, our Chief Compliance Officer (CCO) will issue to you a written acknowledgment, which will include a hyperlink to a summary of the policy or a copy of it.
- We will issue the acknowledgment within 2 business days of receiving the complaint.
- You may be asked to provide clarification or more information to help resolve your complaint.

Relevant Deadlines/Timelines

- A complaint must be filed with Leith Wheeler within 6 years of the date on which the subject of the complaint occurred.
- The CCO will acknowledge receipt of your complaint within 2 business days of receiving it.

- Leith Wheeler will convey the progress and results of its investigation in writing to you within 15 business days from the day we receive your complaint.
- Leith Wheeler will ordinarily provide you with our decision in writing within 60 days of receiving your complaint; however, unless we have exceptional circumstances, we will extend that timeline to 90 days. If we apply the longer timeline, we will explain to you why we have done so.
- If we make an offer to you to resolve the complaint and you accept the complaint, we will implement the resolution within 30 days.

Available Recourse

- Our acknowledgment of the complaint will include information about the independent dispute resolution service, Ombudsman for Banking Services (OBSI), and their contact information. This is the primary option for investors outside of Quebec. Residents of Quebec also have the option of resolving the dispute through the offices of the Autorité des marchés financiers (AMF), Quebec's securities regulator. We will provide you with that contact information as well.
- If decide to make an offer to resolve your complaint or if we reject it, you will be informed of your right to escalate the matter to the AMF.
- The [AMF Complaint Form \(English\)](#) can be found online by clicking this link. The form provides instructions and resources to assist you with the process.
- Any offer that we make to resolve your complaint must remain open for a reasonable period for you to respond. We will provide such amount of time. and, if accepted, it must be implemented within 30 days.