

COMPLAINT HANDLING PROTOCOL

The following is the Internal Complaint Handling Protocol for The Economical Insurance Group of Companies (TEIG).

CUSTOMER COMPLAINT GOALS

At The Economical Insurance Group, we are determined to provide courteous, expedient service in the resolution of complaints and aim to provide an outcome in line with our policies and procedures. We have developed a Complaint Handling Protocol to provide policyholders with a formal internal process through which complaints can be lodged, reviewed and resolved by the company. The protocol applies to all companies within TEIG which include The Economical Mutual Insurance Company, Federation Insurance Company of Canada, Perth Insurance Company, The Missisquoi Insurance Company and Waterloo Insurance Company.

WHAT CAN YOU EXPECT FROM US?

When a complaint is presented, the complainant can expect to be treated in a professional manner and will have the opportunity to provide us with the details of the issue for review. The concern will then be reviewed by the most appropriate level of management on a progressive basis if necessary. Most often, it is our front line staff making the initial decision and although our goal is to make the original decision in accordance with our guidelines and best business practices there are occasionally circumstances where a review is necessary. A company representative in a supervisory or management role will review the initial decision to ensure it is in compliance with our business practice.

COMPALINT HANDLING PROCEDURE

The Economical Insurance Group's Complaint Handling Protocol can be found on the corporate website and is aimed at assisting the customer in resolving complaints in a fair and professional manner. Initially, the insured is encouraged to work through the complaint with the assistance of their Independent Insurance Broker. Failing this, they will be directed to the appropriate department representative at the appropriate branch office in accordance with the complaint workflow chart. Once the complaint has been reviewed by management at the branch office and a final position has been provided and if the result remains unsatisfactory, the next step is to seek assistance from the company Ombudsman. The Ombudsman offers an informal, last step forum to assist in reaching resolution in accordance with the company's approved business practices.

COMPLAINT WORKFLOW

Level	1	2	3	4	5	6
Resource	Broker	Field Staff	Leader	Manager	Ombudsman	External

Level 1

The Independent Insurance Broker as selected by the insured is the best resource to guide and instruct in regard to processes, procedures and expectations. They may be in a position to advocate for the insured and discuss issues with representatives at TEIG. Speaking to the Independent Insurance Broker prior to elevating the concerns is required as they will be brought into the resolution process.

Level 2

Every effort shall be made to handle and resolve customer complaints in the field. (Branch, Member Company, or Service Centre) The level two representative is usually the individual making the initial decision. In the claims scenario this is your adjuster and can be contacted directly by you. In the underwriting scenario, this is the underwriter and they are to be contacted only by the broker, as they are not licensed to speak with you directly.

Level 3

If the concern is not resolved by the broker or our front line staff as in the previous levels, the concern should now be elevated to the individual who leads the front line staff member. This person's contact information can be obtained either through the front line representative in a claims situation or from the broker in an underwriting situation.

Level 4

If the concerns are still not addressed to the complainant's satisfaction, the next step is to speak to a level 4 representative. This individual is at the Management level and will review the issues along with prior decisions. They will then provide the final position for the department.

Level 5

If at this point satisfaction is not achieved, the next step is to escalate your concerns to TEIG's Ombudsman for a review of the issue and a final company position. The Ombudsman will seek to apply the company's principals, practices and guidelines in combination with the policy wordings and the provincial regulations as they relate to the situation. Every effort will be made to ensure that the complaint is handled expediently however some issues require more investigation and consideration than others prior to the delivery of a decision.

Level 6

If after all 5 steps have been exhausted at the company level and there remain issues and concerns that are outstanding, the final option is to seek external assistance. Please view External Assistance options below.

HOW TO FILE A COMPLAINT AT THE BRANCH

The Economical Insurance Group provides several options in submitting a complaint.

Telephone

If contact via telephone is desired, the broker may be an excellent resource in providing the correct contact information. If the broker is unable to assist, we recommend contacting either the handling office or the closest branch. At this point, the call will either be addressed or further contact information will be provided. If there is a requirement to leave a message at the branch, our goal is to return the call by the end of the next business day.

1. Every effort shall be made to handle and resolve customer complaints at the branch level.
2. After determining the nature of the complaint, all customer calls shall be first directed to the appropriate representative as listed above.
3. All complaint calls may be transferred only after ensuring that a company representative is available to take the call. The voicemail option may only be used if the customer agrees to leave a voice-mail message and the call recipient knows that the voice-mail recipient will be able to respond to the caller by the end of the next business day.
4. If the caller does not want to leave a voice-mail, the call recipient is to take a message recording all particulars and contact information and shall pass the message on to the appropriate representative who will respond by the end of the next business day. The name of the person who will be handling the issue should be provided to the caller at this time. If there will be an issue having someone call by the end of the next business day, this should be advised to the client at this time.

Mail

If contacting via mail is desired, forward the correspondence to either the representative who has been dealing with the file or to the closest branch if a name cannot be determined. The correspondence will then be forwarded to the correct person in accordance with our Complaint Handling Protocol.

Contact information for our brokers and offices can be located on our website at www.economicalinsurance.com.

1. All written complaints should be forwarded directly to the addressee.
2. In the event that they are to be away for an extended period of time, it is their responsibility to arrange to have their mail reviewed to ensure that any complaints are addressed without delay.
3. The complaint should then be forwarded to a management level representative in the appropriate department.

Received at Head Office

All complaints received at head office (telephone or mail) should be forwarded directly to the intended recipient. If the complainant is unsure who to contact, the call or letter should be forwarded to the Ombudsman's office for review and action in accordance with the Complaint Handling Protocol.

ABOUT THE COMPANY OMBUDSMAN

The Company Ombudsman oversees issues as they relate to Economical Mutual Insurance Company, Perth Insurance Company, Waterloo Insurance Company, Federation Insurance Company of Canada and The Missisquoi Insurance Company and is responsible for the implementation of complaint procedures. The Company Ombudsman will review issues and is the final step prior to seeking assistance outside the company. For all provinces other than Quebec, the Company Ombudsman can be reached via telephone, mail or website.

Telephone - 519-570-8215 or 1-800-265-9996 x48215. A message may be required which will be returned within 3 business days and in accordance with our complaint workflow. The message provides instructions on how to proceed through the Complaint Handling Protocol. Detailed information about your complaint is required in order to initiate an investigation.

Mail - Written correspondence may also be forwarded to the Ombudsman's office which is located at:

The Economical Insurance Group
111 Westmount Rd. South.
Waterloo ON N2J 4S4

E-mail – Ombudsman.Office@teig.com

Website – This is the preferred submission media and will offer a direct link to the Ombudsman's office. The link is located on our website at www.economicalinsurance.com

Quebec

Manon Maille is the Company Ombudsman for Federation and Missisquoi Insurance in Quebec. She can be contacted at 514-905-2730 or 1-800-361-7573 x57930. She can also be reached via mail at:

La Missisquoi
1 Place Ville Marie, Bureau 1400, Montreal QC, H3B 2B2

PRIVACY RELATED COMPLAINTS

All complaints in regard to privacy related issues are to be submitted in writing to our Privacy Officer.

Dan Little - 111 Westmount Rd. South,
Waterloo ON N2J 4S4

EXTERNAL ASSISTANCE

If once the concern has been reviewed by the Ombudsman and a satisfactory response as not provided, the next step is to seek assistance from an external agency.

General Insurance OmbudService (GIO)

The General Insurance OmbudService (GIO) serves the property and casualty insurance industry in Canada on a national basis. In Alberta, GIO also assists policyholders in resolving complaints about automobile insurance premiums in accordance with provincial legislation. TEIG is a member of this organization.

Should a complaint remain unresolved after going through the insurer's complaint handling protocol and external assistance is requested, the appropriate company representative will provide a letter containing the company's final position. As well, a GIO brochure entitled "Working Towards Solutions" may be included with the final position letter. This brochure outlines the next steps available to a complainant when they are unsatisfied with the company's final position.

GIO can be contacted at 1-877-255-0446. More information about GIO can be found at the website www.giocanada.org

Complaint Handling In Quebec

The Autorite des Marches Financiers can be contacted at 1-877-525-0337. More information about The Autorite des Marches Financiers can be found on their website, English and French site available: www.lautorite.qc.ca

Further information

The following agencies may also be of assistance:

Concerns regarding Regulated Products The Financial Services Commission of Ontario (FSCO) Website: www.fSCO.ca Phone: 1-800-668-0128 Fax: 416-590-7070 Mail: 5160 Yonge Street Box 85, Toronto ON, M2N 6L9	Concerns regarding Financial Transactions The Financial Consumer Agency of Canada (FCAC) Website: www.fcac-acfc.ga.ca Phone: English - 1-866-461-FCAC (3222) French - 1-866-461-ACFC (2232) Fax: 1-866-814-2224 / 613-941-1436 Mail: 427 Laurier Avenue West 6 th Floor, Ottawa ON, K1R 1B9
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