

Northbridge Complaints Handling policy

Introduction

This policy applies to all of the member companies of Northbridge Financial Corporation, which includes Lombard Canada Ltd., Commonwealth Insurance Company, Federated Insurance Company, Federated Insurance Company and Zenith Insurance Company (collectively referred to as “Northbridge”).

What is a complaint?

A complaint is an expression of at least one of the following elements about Northbridge:

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

Complaints are generally expressed in writing through correspondence, email, fax or other form that allows the complaint to be kept on file. Where a complaint is made by phone or in person, and is handled and examined by the Ombudsman, then it must be documented so that it can be kept on file.

Complaint handling responsibilities of employees

When a complaint is first received, it must be directed to the employee with operational responsibility for making a decision on the matter. For example, a claims complaint would normally be directed to the adjuster responsible for the claim file. Sometimes, the employee with operational responsibility may also be a supervisor, manager, or director. With respect to underwriting complaints, the employee with operational responsibility will always be considered to be the manager responsible for the file. As a result, any underwriting complaints must be directed to their attention.

The employee so receiving the complaint should acknowledge and attempt to resolve the complaint promptly. The employee may not refer the customer to the Ombudsman without first attempting to resolve the complaint. The employee may, however, consult with more senior or specialized personnel in attempting to resolve the complaint. If the complaint is claims related it should be referred to the Claims Customer Care Specialist or Regional Claims Lead.

If the customer remains dissatisfied after a reasonable attempt has been made to resolve the issue, the employee must promptly refer the customer to the Ombudsman. The employee may do so by advising the customer that they have the right to have their complaint reviewed by the Ombudsman, and providing the customer with the Ombudsman’s contact information.

Complaint handling responsibilities of the Ombudsman

The Ombudsman is the person designated by Northbridge as its formal representative with respect to complaints, and has formal responsibility for examining and responding to complaints.

When an unresolved complaint is referred to the Ombudsman, the Ombudsman will open a complaint file and provide the customer with an acknowledgement of receipt within two business days. The Ombudsman will investigate the complaint in an objective and impartial manner, and endeavour to provide a response to the customer within ten business days. If further time is required to investigate and respond to the complaint, the Ombudsman may extend the time for a response to thirty days. The Ombudsman will also deliver, if necessary, a final position letter within thirty days.

If the Ombudsman is not able to resolve a complaint to the customer's satisfaction, then the Ombudsman may advise the customer that they have the right to have their complaint reviewed by the General Insurance OmbudService ("GIO") and provide the GIO's contact information. The GIO is an independent dispute resolution system for the insurance industry. The GIO will assist insurance companies and their customers in resolving their differences in a fair, independent and impartial environment. In the province of Quebec, the Ombudsman will also advise the customer that they also have the right to have their complaint transferred to the Quebec Autorité des marchés financiers and provide the Autorité des marchés financiers'contact information.

Complaint reporting responsibilities of the Ombudsman

In addition to examining and responding to complaints, the Ombudsman also has responsibility for reporting on complaints to Northbridge's Board of Directors and to provincial regulators.

In particular, the Ombudsman is responsible for reporting biannually to the Conduct Review Committee of the Board of Directors on complaints received during the year.

The Ombudsman is also responsible for reporting biannually to the Financial Services Commission of Ontario and the Quebec Autorité des marchés financiers through their Complaints Reporting System.

To facilitate the reporting of complaints, the Ombudsman will maintain a complaints register of all complaints referred to the Ombudsman for handling. In this complaints log, the Ombudsman will categorize the complaints and record all data required to be collected by law.

Contact information for the Ombudsman

In provinces other than Quebec, the Ombudsman's contact information is as follows:

Office of the Ombudsman

Northbridge Insurance

105 Adelaide Street West, 3rd Floor, Toronto, ON M5H 1P9

Email: ombudsman@nbfc.com

Telephone: 1-800-268-9680 ext. 4445 Toronto: 416-350-4445

Fax: 416-350-4417

In the province of Quebec, the Ombudsman's contact information is as follows:

Office of the Ombudsman
Northbridge Insurance Bureau
400
1000 Rue de la Gauchetière Ouest
Montréal, QC H3B 4W5

Telephone: 1-800-361-2837
Fax: 514-284-8070

Special types of complaints

There are two categories of complaints which merit special attention.

Firstly, where an employee receives a complaint about Northbridge's handling of a customer's personal information, or compliance with a federal or provincial privacy law, it must be referred to the Privacy Officer for handling. The Privacy Officer will investigate and respond to the complaint in accordance with Northbridge's Privacy Policy.

Secondly, where an employee receives a complaint with respect to an automobile insurance policy issued in Alberta, and the customer is:

- not satisfied with respect to the basis on which a premium for basic coverage for a private passenger vehicle was determined, or
- concerned that Northbridge Insurance has refused to issue or renew a contract, terminated or cancelled a contract, or refused to provide or continue any coverage or endorsement,

then the employee must attempt to resolve the complaint, and report the complaint to the Ombudsman, even if the employee successfully resolved the complaint. The Ombudsman is responsible for reporting biannually to the Alberta Superintendent of Insurance on all such complaints received.