
Complaint Handling Policy



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1 Purpose of the Policy

The purpose of the Complaint Handling Policy (hereafter referred to as "the Policy") is to ensure a fair and free-of-charge handling of complaints. This handling process aims to govern the receipt of complaints directed to Globevest Capital Ltd., the sending of the acknowledgement and notice to the complainant, the creation of the complaint file, the transmission of this file to the Autorité des marchés financiers (hereafter referred to as "the Authority") at the complainant's request, the transmission of the annual complaint report to the Authority, and the submission of a report via the Online Services (SEL) once a year..

2 Definition of a Complaint

A complaint consists of the expression of one of the following three elements:

A reproach directed towards the company;

A report of a potential or real harm suffered or that could be suffered by a consumer;

A request for corrective action.

Thus, an initial expression of dissatisfaction from a consumer, whether written or not, does not constitute a complaint if the dissatisfaction is resolved in the normal course of the company's activities. However, if the consumer remains dissatisfied and their dissatisfaction must be addressed by the person responsible for handling complaints, as designated in the company's policy, then it is considered a complaint.

Furthermore, according to Article 13.16 of Regulation 31-103:

The complaint must concern the brokerage or advisory activities of the registered company or its representatives;

It must be received by the company within 6 years from the date when the client had or reasonably should have had knowledge of the act or omission from which the complaint arises or is related.

3 Responsibility for Policy Implementation

The person responsible for implementing the Policy at Globevest Capital is the Chief Compliance Officer, Alexandre Roy. He acts as the contact person with the Authority and oversees the training of the company's staff on complaint handling and dispute resolution. He is responsible for providing employees with all necessary information to ensure compliance with and application of the Policy.

In the absence of the responsible person, the Compliance Officer, Sarah Palardy, will act as the contact person with the Authority.

The responsible person also has the following duties:

- To send an acknowledgment and notice to the complainant;
- To transmit the complaint file to the Authority, at the complainant's request;
- To submit an annual report to the Authority via the Authority's Online Services system.

4 Complaint Handling Process

4.1 Receipt of the Complaint

A consumer wishing to file a complaint may do so by email, fax, or by letter at the following contact details:

Globevest Capital Ltd.
Complaint Handling
1005, Lionel-Daunais, Suite 104
Boucherville, Quebec, J4B 0B1
Tel: 450-641-8989
Fax: 450-641-2889
traitementdesplaintes@globevestcapital.com

Any employee who receives a complaint must immediately forward it to the responsible person for policy implementation.

A complaint or denunciation form is available for complainants on the Authority's website.

4.2 Sending an Acknowledgement to the Complainant

- Upon receiving the complaint, the person responsible for the policy must acknowledge receipt of the complaint within 10 business days.
- The acknowledgment must include the following:
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 - A description of the received complaint, specifying the harm suffered or potential harm, the reproach directed at the registered company, and the corrective action requested;
 - The name and contact details of the person responsible for handling the complaint;
 - In the case of an incomplete complaint, a notice requesting additional information from the complainant within 30 days, failing which the complaint will be deemed abandoned;

- A notice informing the complainant of their right to request, if dissatisfied with the final position or treatment of their complaint, the transfer of their file to the Authority. This notice should also mention that the Authority may offer dispute resolution services, if deemed appropriate;
- A note informing the complainant that filing a complaint with the Authority does not interrupt the limitation period for pursuing their claims against the company before the civil courts..

4.3 Opening a Separate File for Each Complaint

Each complaint must be assigned a separate file. In the event the complainant requests the transfer of their file to the Authority, this file will be transmitted to the Authority.

The file must include:

- The written complaint from the complainant, including the three elements of the complaint:
 - the reproach directed at the company;
 - the real or potential harm;
 - the corrective action requested.
- Any documents submitted by the complainant;
- A copy of the acknowledgment sent to the complainant;
- All relevant information related to the complaint;
- The outcome of the complaint handling process (the analysis and supporting documents);
- The final written and reasoned response to the complainant;
- Any other documents deemed relevant.

A copy of this file will be added to the client's file.

4.4 Handling a complaint

The process of handling a complaint must be initiated immediately upon its receipt.

The complaint must be handled within 60 days after receiving all necessary documents.

Upon completion of the examination of the complaint, the responsible person will send the complainant the final written and reasoned response.

4.5 Transmitting the Complaint File to the Authority, at the Complainant's Request

If the complainant is dissatisfied with the final position or the handling of their complaint, they may request, at any time, to have their file transferred to the Authority.

The transferred file will consist of all the relevant information related to the complaint.

However, the complainant is strongly encouraged to wait until the complaint handling period has expired to ensure that the Authority has all the relevant information, including Globevest Capital Ltd.'s final written and reasoned response.

To request the transfer of their complaint, the complainant may use the Complaint Transfer Form available on the Authority's website.

For clients outside Quebec, dispute resolution services are provided by the Ombudsman for Banking Services and Investments.

4.6 Creating and Maintaining a Register

Globevest Capital Ltd. maintains a register of complaints for the purpose of applying the Policy. The register is updated by the responsible person. All complaints made must be recorded in this register.

5 Complaint Report

Once a year, the responsible person submits a report to the Authority via the Authority's Online Services (SEL), whether or not complaints have been received, stating the number and nature of the complaints received.

The reporting period for complaints is from March 1 to May 1 of each year. The responsible person must report complaints received between January 1 and December 31 of the previous year.

6 Effective Date

This Policy comes into effect on March 21, 2025.