

Complaint Examination Policy for Quebec Residents

Purpose of the policy

The purpose of this policy is to ensure a fair and free examination of complaints. More specifically, it is intended to provide oversight for the receipt of complaints, delivery of the acknowledgment of receipt and notice to the complainant, creation of the complaint file, transfer of this file to the Autorité des marchés financiers (AMF) at the complainant's request, and filing of the complaint report with the AMF. This Policy applies to the following entities:

- HSBC Mortgage Corporation (Canada)
- HSBC Trust Company (Canada)
- HSBC Investment Funds (Canada) Inc.
- HSBC Private Investment Counsel
- HSBC Global Asset Management

Person in charge

The person in charge of applying the policy, the **Head of Customer Experience**, acts as the respondent with the AMF and the complainant. For some entities, this process is delegated elsewhere within HSBC.

This person trains HSBC employees and provides them with the necessary information for compliance with the policy.

Our designated employees for handling complaints are responsible for:

- Delivering an acknowledgment of receipt and notice to the complainant;
- Transferring the file to the AMF, at the complainant's request;

Definition of a complaint

For the purposes of this policy, a complaint is the expression of at least one of the following three elements:

- A reproach against the registrant;
- The identification of real or potential harm that a consumer has sustained or may sustain; or

- A request for remedial action.

Informal steps to correct a specific problem are not considered a complaint, provided the problem is resolved as part of the registrant's normal activities and the consumer has not filed a complaint.

Receipt of the complaint

Employees who receive a complaint under this policy must immediately forward it to a designated employee for handling complaints.

This employee must acknowledge receipt of the complaint within a reasonable period of time, i.e. within **2 business days** of receiving it.

The acknowledgment of receipt must contain the following information:

- A description of the complaint, specifying the real or potential harm, the reproach against the registrant and the requested remedial action;
- The name and contact information of the designated person who is in charge of examining the complaint;
- In the case of an incomplete complaint, a notice requesting more information to which the complainant must respond within a set deadline, failing which the complaint will be deemed to have been abandoned;
- This complaint examination policy;
- A notice stating that if not satisfied with the outcome or with the examination of the complaint, the complainant can request that the complaint file be transferred to the AMF. This notice must also mention that the AMF may offer dispute resolution services, if deemed appropriate;
- A reminder to the complainant that filing a complaint with the AMF does not interrupt the prescriptive period for civil remedies against the registrant.

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Creation of the complaint file

A separate file must be created for each complaint.

The file must contain the following:

- The written complaint and its three elements (the reproach against the registrant, the real or potential harm and the requested remedial action);
- The outcome of the complaint examination process (the analysis and the supporting documents);
- The final written response to the complainant with justifying reasons.

Complaint Examination

On receiving a complaint, the respective legal entity must initiate its complaint examination process.

The complaint must be examined within a reasonable period of time given all necessary information is received for the examination of the complaint, as follows:

Legal Entity Name	Time Period
HSBC Mortgage Corporation (Canada)	Within 90 days
HSBC Trust Company (Canada)	Within 90 days
HSBC Investment Funds (Canada) Inc.	Within 90 days
HSBC Private Investment Counsel	Within 90 days
HSBC Global Asset Management	Within 90 days

After examining the complaint, the designated person who is in charge of examining the complaint must send the complainant a final response with justifying reasons.

Transfer of the file to the AMF

If not satisfied with the outcome or with the examination of the complaint, the complainant may ask the respective legal entity, at any time, to transfer the file to the AMF.

The transferred file must include all the information related to the complaint.

The respective legal entity is responsible for complying with the rules governing the protection of personal information.

Filing report with the AMF

Twice a year, the person in charge of applying this policy must use CRS to file a report with the AMF detailing the number and type of complaints received. This person must do so regardless of whether any complaints were received. For some entities, this process is delegated elsewhere within HSBC.

The reporting periods are as follows:

- no later than July 30, for data collected between January 1 and June 30;
- no later than January 30, for data collected between July 1 and December 31.

Effective Date

The effective date of this policy is December 2020 and amended on June 13, 2022 to include all legal entities that are in scope for this policy.

AMF Information Centre Contact Information

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