

## COMPLAINTS

The NPW Complaint Process has been adopted with a commitment to engage in and promote honest and ethical conduct and to provide complete, fair, accurate, timely and understandable resolutions to client complaints. It is our belief that by demonstrating to our clients that their issues are dealt with seriously enhances everyone's confidence in the industry. As a demonstration of this commitment, NPW has adopted this Complaint Process. There are two types of complaints, service complaints and complaints that may involve regulatory infractions. While the firm will investigate either type of complaint, what is carried out is the process that will be followed if a potential regulatory infraction is involved.

### **How do I make a Complaint?**

There are several resources available to you if you wish to make a complaint. Your first option is to contact your Investment Advisor with the issue. If you feel that your issue requires attention at a more senior level, you may direct your concerns to either the business location's Supervisor (Branch Manager) or the NPW Compliance Department directly. Complaints may be written or verbal.

### **How is the Complaint Investigated?**

All complaints involving regulatory or legal issues are investigated by the Compliance Department in conjunction with the business location's Supervisor and the staff member involved in the complaint. Upon receipt of a complaint, NPW will acknowledge the issue in writing with a letter to you within 5 days. The letter will summarize the complaint, introduce the individual responsible for the investigation with their contact information so that you may contact them throughout the investigation to determine the status of the file, a reference to the maximum amount of time the investigation may take, and will enclose a copy of the Investment Industry Regulatory Organization of Canada ("IIROC") "An Investor's Guide to Making a Complaint" brochure. Our investigation process includes a review of account documentation, including account opening forms and client statements. Our investigation process may also include a request to interview you to clarify or attain any additional information required to investigate a complaint.

Alleged misconduct includes, but is not limited to allegations of:

- A breach of confidentiality,
- Theft,
- Fraud,
- Misappropriation or misuse of funds or securities,
- Forgery,
- Unsuitable investments,
- Misrepresentation,
- Unauthorized trading,
- Or other inappropriate financial dealings with clients, and
- Engaging in securities related activity outside the dealer.

Upon completion of our investigation, you will receive a substantive response within 90 day that will contain the following:

A summary of your complaint;

The results of our investigation;

Our final decision on the complaint, including an explanation; and

A statement describing the options available to you if you are not satisfied with our response, including:

- arbitration;
- if a request is made within 180 days from the date of our final response, the ombudsperson service (i.e. the Ombudsman for Banking Services and Investments);
- submitting a regulatory complaint to IIROC for an assessment of whether disciplinary action is warranted; and
- Litigation/civil action.

Depending on the nature of the complaint and/or the outcome of an internal investigation, reporting to our regulators the Investment Industry Regulatory Organization of Canada (IIROC) through the National Registration Database and/or the Complaints and Settlement Reporting System (ComSet) may be required. NPW has designated the Chief Compliance Officer as the Designated Complaints Officer. The Designated Complaints Officer is charged with the oversight of the complaint handling process and may also act as a liaison between NPW and the Regulatory bodies. Any questions regarding the firm's complaint handling process should be forwarded to the Designated Complaints Officer by contacting 905.845.9090.



More information regarding the complaint handling procedures is provided on our website at [www.npw.ca](http://www.npw.ca).