



## **Purpose of the Policy**

TD Asset Management Inc. ("TDAM", "we", "us", "our") wants its clients to have the best experience possible when they do business with us. If a client has an issue or concern with a product we offered or sold, or a service we provided, we want to address it as quickly and effectively as possible.

This Complaint Examination and Dispute Resolution Policy (the "Policy") has been established to outline the steps TDAM will take when in receipt of a complaint from a client who resides in Quebec.

## **Definition of a Complaint**

For the purpose of this Policy, a "Complaint" is the expression of one or more of the following three elements, which persist after being considered and examined by our Institutional Distribution - Relationship Management Group:

- a reproach against us or one of our registered individuals;
- the identification of real or potential harm to a client; or
- a request for remedial action.

Informal steps to correct a problem or concern are not considered a Complaint if the problem is resolved in the regular course of business. In the event that an issue or concern is not resolved by a Relationship Manager, the Complaint will be escalated to TDAM's Managing Director, Head of Institutional Distribution.

## **Contents of a Complaint File**

A file will be opened for each Complaint received (the "Complaint File") and will include the following contents:

- A description of the Complaint and all documents provided by the client in connection with the Complaint;
- TDAM's review of the Complaint, including any additional information related to the Complaint; and
- A copy of the written response provided to the client regarding the Complaint.

## **Receipt of a Complaint**

Upon receipt of a Complaint, a written acknowledgement of receipt will be sent to the client as soon as possible, and no later than 10 calendar days. The acknowledgment of receipt will contain the following information:

- The date the Complaint was registered internally at TDAM in the Complaints register;
- The right of the client to examine the Complaint File;
- A description of the Complaint, specifying one or more of the following elements:
  - the reproach against TDAM or one of our registered individuals;
  - the real or potential harm; or
  - the requested remedial action.
- The name and contact information of the person in charge of examining Complaints;
- In the case of an incomplete Complaint, a notice requesting more information to which the client must respond within a set timeframe, failing which the Complaint will be deemed to have been abandoned;
- This Policy; and
- A notice to the client advising them of the following:
  - If unsatisfied with the outcome or with the examination of the Complaint, the right at any time to request that the Complaint File be transferred to the Autorité des Marchés Financiers ("AMF") for review;
  - Following the transfer, the AMF will examine the Complaint File and, if deemed appropriate, may offer



- dispute resolution services; and
- A reminder to the client that filing a Complaint with the AMF does not interrupt the prescriptive period for civil remedies against TDAM.

### **Complaint Examination Process**

Complaints will be investigated within a reasonable period of time and clients will be provided with a written response within 90 days of receipt of the Complaint. Some complex investigations may take longer. If more time is required to complete a thorough investigation, the client will be advised in writing.

### **Escalation to the TD Ombudsman**

Upon review of the written response from TDAM, if the client is not satisfied with the outcome, the client may choose to escalate its Complaint by contacting the TD Ombudsman. Escalations to the TD Ombudsman must be made in writing. The client must provide the TD Ombudsman with their contact information, details of the Complaint, and a proposed resolution. The contact information of the TD Ombudsman is provided below.

The estimated time the TD Ombudsman takes to review and provide a response to matters is 90 days; however complex investigations may take longer to resolve. It is recommended that clients wait for TDAM to first investigate and provide a written response to the Complaint before contacting the TD Ombudsman. However, clients may contact the TD Ombudsman at any point in time. Please note that statutory limitation periods may continue to run while the TD Ombudsman reviews a complaint, which could impact the ability to commence a civil action.

Please note that the TD Ombudsman is employed by TD Bank Group. The TD Ombudsman does not report directly to any business areas in order to protect the office's impartiality, however it is not an independent dispute resolution service. The mandate of the TD Ombudsman is to review your concerns and provide a response that is objective and unbiased.

### **Complaint Reporting Obligations**

Twice a year, a declaration is filed with the AMF via the Client Reporting System confirming the number and type of Complaints received. A declaration is required even if no Complaints were received within the specified period. A declaration for the period from January 1<sup>st</sup> to June 30<sup>th</sup> is required to be reported on or before July 30<sup>th</sup>. A declaration for the period from July 1<sup>st</sup> to December 31<sup>st</sup> is required to be reported on or before January 30<sup>th</sup>.

Individual Complaints will be reported to the AMF via the Client Reporting System within a reasonable timeframe after their receipt but before the end of the applicable reporting period.

### **Contact Information for Persons Responsible for Examining Complaints**

Clients who wish to file a Complaint may send correspondence to the following address:

Mark Cestnik  
Managing Director, Head of Institutional Distribution  
TD Asset Management Inc.  
161 Bay Street, 34th Floor  
Toronto, ON M5J 2T2  
Phone Number: 1-888-834-6339/ (416) 983-0055  
Email: [inst.info@tdam.com](mailto:inst.info@tdam.com)



Clients who wish to escalate unresolved Complaints to the TD Ombudsman may send correspondence to the following address:

TD Ombudsman  
P.O. Box 1, TD Centre  
Toronto, Ontario M5K 1A2  
Phone Number: (888) 361-0319  
Email: [TD.ombudsman@td.com](mailto:TD.ombudsman@td.com)

Additional information about the TD Ombudsman can also be found on the following website [here](#).

### **Last Reviewed**

This Policy was last reviewed and approved by the TDAM Policy Oversight Committee on April 9, 2021.