

INSURER CODE OF CONDUCT AND FAIR TREATMENT OF CUSTOMERS POLICY



Purpose

At First Canadian Financial Group (First Canadian), we are dedicated to ensuring that our customers are treated fairly and that our business practices align with the expectations set by the Canadian Council of Insurance Regulators (CCIR), Canadian Insurance Services Regulatory Organizations (CISRO), and provincial regulators. This policy applies to the Board of Directors (Board) and all employees, distributors, and third-party service providers associated with First Canadian.

We are committed to upholding high ethical standards in our strategies, procedures, processes, and controls, supporting the fair treatment of customers as described in the following categories. We continually strive to improve our practices and regularly review this policy to adapt to regulatory changes and the evolving needs of our customers.

1. Governance & Business Culture

At First Canadian, fostering a culture of fair treatment of customers (FTC) involves all organizational levels and processes, from strategic planning to day-to-day operations. The Board, senior management, and oversight functions are collectively responsible for designing, approving, implementing, and monitoring policies and procedures that ensure FTC.

We promote FTC internally through regular training programs, internal communications and incorporating ethical behavior into performance evaluations

Accountability is maintained at all levels, starting from recruitment, to ensure that all employees and distributors uphold the highest standards of ethics and integrity.

2. Conflicts of Interest

As First Canadian interacts with customers, distributors, and other insurers, conflicts of interest may arise. Potential conflicts could include situations where personal interests of an employee or distributor might influence their professional judgment. We are committed to identifying, avoiding, and managing any perceived or potential conflicts of interest to maintain our duty of care to our customers.

- **Reporting:** Employees and distributors are required to report any potential conflicts to management promptly.
- **Policies:** We have established a Code of Conduct & Ethics and specific policies and procedures that outline how conflicts are to be managed and communicated.
- **Transparency:** First Canadian documents its decision-making process, maintains a complaints handling protocol with an escalation path, and employs preventive measures to avoid conflicts of interest, ensuring integrity in all interactions.

3. Outsourcing

When First Canadian outsources any functions, we retain full and ultimate responsibility for those functions.

- **Selection Criteria:** We carefully select third-party providers through a due diligence process assessing

ethical standards, policies & procedures, ability to achieve FTC outcomes and reputation & compliance history.

- **Controls & Monitoring:** Providing necessary training, setting clear expectations and conducting regular monitoring and audits.

4. Design of Insurance Products

In developing or modifying our insurance products, First Canadian places the interests of our current and future customers at the forefront.

- **Research & Feedback:** Conduct thorough research to assess needs, suitability, and preferences.
- **Product Testing:** Before launching new products, we may conduct testing or pilot programs to ensure suitability and effectiveness.
- **Documentation:** All product documentation outlines coverage in clear, concise, and accurate language, adhering to all legal and regulatory requirements.
- **Continuous Improvement:** After a product is launched, we monitor its performance and make necessary revisions.

5. Distribution Strategies

First Canadian is accountable for all distribution strategies and maintains oversight of the distribution of our products.

- **Tailored Strategies:** Strategies are tailored to each product, considering the evolving needs of our customers.
- **Evaluation of Channels:** Distribution channels are evaluated based on their ability to meet customer needs, provide quality service and comply with regulatory requirements.
- **Training & Support:** We provide training and support to our distributors to ensure their understanding of our products and the regulatory landscape.
- **Policies & Controls:** Implemented to ensure all distribution models are appropriate, with continuous assessment and monitoring.



6. Disclosure to Customers

First Canadian ensures that customers are well-informed about our products both before and at the point of sale, with information provided in clear, accessible formats in both English and French.

- **Transparent Information:** Accurate, clear, and easily understandable information detailing product characteristics. Key disclosure features include conditions, exclusions, restrictions and benefits payable.
- **Accessible Formats:** Information is available in written or electronic formats, in both English and French.
- **Ongoing Communication:** After purchase, we provide relevant information at key stages, such as policy renewals or when changes occur.

7. Product Promotion

First Canadian is committed to providing promotional material that is accurate, clear, and not misleading, in both English and French.

- **Compliance:** All promotions comply with advertising standards and regulatory guidelines.
- **Internal Review:** Promotional content is thoroughly reviewed before and after publishing.
- **Clarity & Consistency:** Ensuring consistency with the coverage offered, clearly outlining benefits and limitations, and accurately identifying our role as an insurer.

8. Advice

First Canadian and our distributors are committed to providing customers with relevant advice in a clear and accurate manner.

- **Considerations:** Financial knowledge & experience, needs & priorities, ability to afford a product and risk profile.
- **Qualifications:** Distributors possess appropriate qualifications & licenses, and competency of distributors is regularly assessed.
- **Documentation:** Recommendations are documented and communicated in written or electronic format.
- **Professional Development:** Ongoing training and programs keep our employees formed about industry changes and best practices.
- **Quality Control:** Periodic reviews of customer files to monitor the quality of advice.

9. Claims Handling & Settlement

First Canadian ensures that our claims process is simple, transparent, and easily accessible.

- **Clear Guidance:** Outlining all steps from claim initiation to final determination.
- **Timely Acknowledgment:** Promptly acknowledging receipt of claims with expected timelines.
- **Regular Updates:** Providing status updates throughout the adjudication process.
- **Detailed Explanations:** Whether approved or denied, claimants receive detailed explanations in clear language.
- **Fair Resolution:** If unsatisfied, customers have access to balanced and impartial resolution procedures, including escalation options.

10. Complaints Handling & Dispute Resolution

First Canadian is committed to examining and resolving complaints in a timely, diligent, and fair manner.

- **Accessibility:** Complaints process is easily accessible from our website and available upon request, in both English and French.
- **Acknowledgment:** Prompt acknowledgment of complaints with estimated review timeframes.
- **Record-Keeping:** Maintaining records of each complaint and resolution measures.
- **Continuous Improvement:** Using complaint data to identify trends and improve products, services, and processes.
- **Escalation:** Informing customers of options to escalate unresolved complaints to external review bodies.

11. Protection of Personal Information

First Canadian takes the protection of personal information very seriously.

- **Compliance:** Adhering to all applicable federal and provincial privacy legislation.
- **Safeguards:** Encryption technologies, strict access controls, regular security assessments and continuous system monitoring.
- **Customer Confidence:** Striving to provide confidence regarding the safety and security of personal information.

For questions or concerns, contact: privacy@firstcanadian.ca.

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12. Regulatory Compliance

First Canadian is committed to full compliance with all applicable federal and provincial laws and regulations governing the insurance industry.

- *Staying Informed*: As active members of the Canadian Life and Health Insurance Association (CLHIA), we stay engaged with legislative changes, industry standards, and evolving practices.
- *Reflective Practices*: Ensuring policies and practices reflect current legal requirements.
- *Operational Integrity*: Regulatory compliance is integral to our operations and supports our dedication to the fair treatment of customers.

13. Policy Review and Updates

- *Regular Reviews*: This policy is reviewed annually or more frequently if necessary.
- *Communication*: Updates or changes will be communicated to employees, distributors, and customers where appropriate.

14. Accessibility

We are committed to making this policy accessible to all customers and stakeholders.

- *Availability*: The policy is available on our website in both English and French and can be provided, upon request, in other languages or formats.

If you have any questions or require assistance regarding this policy or any of our practices, please contact us:

Email: compliance@firstcanadian.ca

Mailing Address:

First Canadian Financial Group
320 Sioux Road
Sherwood Park, AB T8A 3X6

Thank you for choosing First Canadian. We value your trust and are here to support you every step of the way.