



Trust must be earned

COMPLAINTS HANDLING POLICY

Amundi Canada

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I - Preamble

As set out in the complaint handling and dispute resolution provisions of the Securities Act (the "Act"), National Instrument 31-103 Registration Requirements and Exemptions (the "Reg") and the Regulation Respecting Complaint Processing and Dispute Resolution in the Financial Sector (the "Complaint Reg"), Amundi Canada Inc. (the "Amundi Canada"), as a registrant party and financial intermediary, must have a complaint-handling policy.

1 - Policy Objective

The purpose of this Policy is to provide a fair and free process to deal with all complaints received by Amundi Canada. The Policy provides a framework for the receipt of complaints, the transmission of acknowledgements of receipt and notices to the complainant, the compilation of complaint files, the transmission of the complaint file to the Autorité des marchés financiers (hereinafter "AMF") when required, and the compilation of complaints for the purpose of preparing and submitting reports to the Amundi Canada Risk and Compliance Committee, the Board of Directors and annual report to the AMF.

II - Application of the Policy

1 - Responsible for the application of the Policy

Amundi Canada's Chief Compliance Officer (CCO) is responsible for the application of this policy. The CCO acts as Complaints Officer and ensures clients can readily obtain information on how Amundi Canada deals with complaints and the processing of their complaints.

2 - Duties of the Complaints Officer

The Complaints Officer is responsible for ensuring:

- A complaint file is created for each complaint received;
- the acknowledgement of receipt is sent to the complainant;
- the required responses are sent to the complainant in allotted timeframes;
- the complaint file is sent to the AMF at the complainant's request;
- a register of complaints is maintained;
- annual complaint reports are filed with the AMF.

In addition, the Employer ensures that Amundi Canada representatives are provided with the information necessary to ensure that they understand and apply this policy.

The Complaints officer may delegate these responsibilities but is responsible to ensure:

- our staff does the necessary follow-up to ensure our clients' complaints are processed properly;
- the persons tasked with processing complaints have the necessary competence to process the complaints assigned to them; and
- each complaint is treated objectively and processed in a manner that considers the client's interests.

III - Definition of "complaint"

Amundi Canada has adopted the definition of a complaint noted in the Complaint Reg.

A "complaint" means any reproach or dissatisfaction in respect of a service or product offered by a financial institution or a financial intermediary where the reproach or dissatisfaction is communicated by a person who is a member of the clientele of the financial institution or financial intermediary and a final response is expected.

The following are not considered complaints:

- a request made for information or materials in respect of an offered product or service;
- a request for access or rectification made in accordance with the Act respecting the protection of personal information in the private sector (chapter P-39.1);
- a claim for an indemnity or any other insurance claim;
- a request for correction of a clerical error or mistake in calculation; and
- communication of a comment or feedback

IV - Complaints Handling Process

All complaints are processed objectively while considering the interests of the complainant, and we communicate with complainants in clear and plain language.

1 - How to Contact Amundi Canada

Our clients may contact us at any time to obtain information on how we process complaints or how they can file a complaint or inquire about a complaint they have made.

Our clients can contact us by:

- Phone: +1 514 982-2900
- Fax: +1 514 982-2915
- Email : acclientservicing@amundi.com
- Mail: Amundi Canada Inc. 2000 avenue McGill Collège, bureau 1920, Montréal (Québec) - H3A 3H3

2 - How to file a complaint

Clients may submit their complaint, free of charge, in the official national language of their choice, and the communication must clearly state that it is a complaint. The client must explain in detail the facts giving rise to the complaint and attach all relevant supporting documents.

Amundi Canada invites you to formalize any dissatisfaction in writing (letter or email):

To your client service representative, or direct to Amundi Canada Inc:

- By post to Amundi Canada Inc. 2000 avenue McGill College, bureau 1920, Montréal (Québec) - H3A 3H3;
- By e-mail to: acclientservicing@amundi.com
- By Fax +1 514 982-2915.

Clients may also file a complaint directly to the AMF using the form complaint form available on the AMF website:

https://lautorite.qc.ca/fileadmin/lautorite/formulaires/grand-public/GP-plainte_formulaire-plainte-an.pdf.

3 - Receipt / Determination of a complaint

Any employee receiving a complaint must forward it to the Complaints Officer upon receipt.

When a client expresses a reproach or dissatisfaction, we determine whether what is communicated is a complaint by considering and assessing all the elements provided by the client. If there is any uncertainty, we contact the client to better understand the situation and assess whether the client is making a complaint.

We assist clients in properly filing their complaints by, for example, asking them questions to better understand the situation. We also make sure we understand what they are expecting from us so that, among other things, we know what they are asking for (e.g., a correction, a refund, an apology, etc.).

4 - Acknowledgement of a complaint

Amundi Canada will provide an acknowledgement of receipt of the complaint within ten (10) business days from the date on which the first written complaint is sent (the postmark will be taken as proof of receipt for complaints sent by post).

Amundi Canada's "Acknowledgement of receipt" contains the following information:

- the complaint record identification code;
- the date on which the complaint was received by Amundi Canada, if different than the date on which the complaint was registered;
- the means by which the complainant may obtain information about the processing of the complaint;
- the expected timeframe for processing the complaint and the date before which the final response must be provided to the complainant; and
- a hypertext link providing access to the summary of the complaint processing and dispute resolution policy, or a copy of such summary.

5 - Documenting the Complaint

Each complaint is the subject of a separate file. All relevant documents and information pertaining to the complaint are added to this file as the complaint is processed.

The complaint record is kept for the same retention period as the client record and in accordance with our privacy policy. For information on our privacy policy please see <https://www.amundi.ca/professional/personal-information-protection>.

6 - Handling of the complaint

Upon receipt of a complaint, the Complaints Officer conducts an investigation.

Amundi Canada must obtain all the information required to process the complaint by requesting additional information from the client or by asking employees or your representative to provide the information or documents required to analyze the complaint.

The complaint must be processed and responded to as soon as possible and no later than 60 days following receipt of the complaint by Amundi Canada, provided that the Company has all the

information necessary for its investigation. If exceptional circumstances or circumstances beyond Amundi Canada's control¹ apply the final response must be delivered no later than 90 days following receipt of complaint.

The time limit for processing the complaint begins on the date of receipt of the complaint as stipulated in the acknowledgement of receipt sent by Amundi Canada to the complainant.

If, due to exceptional circumstances or circumstances beyond Amundi Canada's control, the complaint cannot be dealt with within the time limit set out above, Amundi Canada will notify the complainant in writing on or before the expiry of the initial 60 day time limit.

At the conclusion of the investigation, Amundi Canada will provide the complainant with a final written response. The response will include the following information:

- a statement to the effect that it is a final response;
- a summary of the complaint received;
- the conclusion of the analysis, including the reasons for the conclusion, and the outcome of the complaint process;
- a statement of the complainant's right to request to have the complaint record examined by the AMF, as well as an explanation of how to make such a request;
- if an offer to resolve the complaint is presented to the complainant, the timeframe within which the complainant may accept the offer; and
- the business contact information and signature of the person who processed the complaint.

7 - Simplified process for certain complaints

We may follow a simplified process for certain complaints. This process is used for complaints that we can resolve to the satisfaction of clients within 20 days.

We consider a complaint to be resolved to the satisfaction of the client when the client accepts our proposed solution to their complaint or when the explanations we provide are sufficient to resolve the complaint.

A written acknowledgment of receipt or written final response does not have to be sent to the client. The designated person that handles the complaint can process it verbally (e.g., in a phone call).

The person who processes the complaint must, for each complaint:

- inform the client that their complaint has been received and that they have the right to request to have their complaint record transferred to the AMF (within 10 days); and
- provide the client with our response and the proposed solution to their complaint (within 20 days).

These exchanges may be summarized in a document placed in the complaint record or may be recorded in full in the complaint record. The complaint record, including the information used in processing and resolving the complaint, may be kept in the client record.

When using the simplified process and where a complaint cannot be resolved to the satisfaction of the complainant, Amundi Canada will send the complainant, not later than on the 20th day following

¹ Circumstances beyond our control delay the processing of the complaint, (e.g., when documents, such as statements or reports, need to be obtained from a third party in order to analyze the complaint); or
Exceptional circumstances arise that warrant an extension of the complaint analysis period (e.g., when we experience a sharp increase in our complaint volume following a natural disaster).

receipt of the complaint, a written acknowledgement as outlined in section IV 4 – Acknowledgment of a complaint.

8 - Referral of the file to the Autorité des marchés financiers

If the complainant is dissatisfied with the handling of his complaint or the response obtained following its review, he may request that Amundi Canada transfer his complaint file to the AMF or may make the request directly to the AMF². In either case, Amundi Canada will ensure the complainants record is sent to the AMF within 15 days following the receipt of the request. Requests for Amundi Canada to transfer a complaint should be made to the Complaints Officer.

The file transferred to the AMF contains all the documents relating to the complaint.

The Complaints Officer is designated as the person responsible to interact with AMF to ensure follow-up on the processing of a complaint or when a complaint record is examined by the AMF. The Complaints Officer is also the point of contact with the AMF for participation in any remediation proposed by the AMF.

Compliance with the rules of protection of personal information remains the responsibility of Amundi Canada.

V - Amundi Canada complaints management

1 - Amundi Canada's responsibilities

Principle responsibilities of Amundi Canada include the following:

- Any representative or employee receiving a complaint must forward it to the Complaints Officer upon receipt;
- Any employees tasked with processing a complaint must defer to process if they are in a potential conflict of interest or cannot do so in an objective manner;
- Any employee tasked with processing a complaint must ensure they have the required competence or knowledge to process the complaint and if necessary seek assistance from individuals who have that knowledge;
- Ensure that complainants understand the complaints process and assist them in filing any complaint they may have;
- Ensure that complainants have all the information sought by them in connection with their complaint. And inform complainants on how they will be informed on the status of their complaint;
- Inform complainants when a complaint affects another stakeholder, including the extent to which the complaint involves the stakeholder;
- Ensure that if the complaint has consequences for other clients, it takes necessary actions to address the situation for all clients.

2 - Maintenance of a complaint registry

Amundi Canada has established a Complaints Registry as part of the implementation of this policy. . The Complaints Officer is responsible for ensuring the necessary information is submitted to the registry.

² See paragraph IV 2 – How to file a complaint.

Any complaint as defined in section III of this Policy must be entered in the registry and, in particular:

- any written complaint, regardless of the level of intervention involved in the handling of the complaint;
- any legal proceeding that falls within the definition of a complaint in section III of this Policy.

3 - Contents of the complaint file

Each complaint file contains the following information:

- the complainant's written complaint detailing;
- a copy of the acknowledgement of receipt sent to the complainant;
- any document(s) or information used in analyzing the complaint;
- any document(s) or information sent or provided pertaining to any offer of resolution, additional documents / facts received from the complainant or any information pertaining to any additional institutions impacted by the complaint;
- copies of any written notices sent to complainant per section IV, paragraph 6 or 7;
- the outcome of the complaint process (the analysis and supporting documentation);
- a copy of Amundi Canada's final written response sent to the complainant.
- any exchanges, or a summary of the exchanges, with the complainant.

The Complaints Officer is responsible to ensure updates to complaint files are made as required.

4 - Delegation of complaint processing and analysis

Normally complaints are handled by the Complaints Officer, however, the Complaints Officer may assign it to another employee. When handled by a designate, the designate remains under the Complaints Officers supervision.

In determining if the complaint can be handled by a designate the following factors are considered:

- how complex the complaint is;
- whether the designate has the necessary competence (knowledge, training and professional experience) to handle the complaint; and
- what the designates workload is like.

In all cases, we make sure the person processes each complaint in accordance with our complaint processing policy and has access to all the information required to process the complaint.

5 - Governance and continuous improvement

Amundi Canada reports on complaints to its Risk And Compliance Committee quarterly and its Board of Directors semi-annually. Information reported to these bodies includes:

- the number of complaints received and processed and our responses to them;
- the causes common to the processed complaints and the problem situations identified when determining those causes; and
- issues related to the implementation and dissemination of, and compliance with, the policy.

We use the information to target recurring issues that are flagged and to take appropriate corrective action.

6 - Annual Reports to the AMF

Amundi Canada is required to file a complaint report with the AMF once per year. The Chief Compliance Officer ensures that the information relating to each complaint received is submitted to the AMF's computerized reporting system within the prescribed deadlines.

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