

Complaint Processing and Dispute Resolution Policy

GFI is committed to processing complaints diligently, assisting complainants throughout the complaint process and providing clear and timely communications.

What is a Complaint?

A complaint is any reproach or dissatisfaction regarding a service or product offered by GFI, where there is an expectation that we take action to address your complaint.

Filing a Complaint

If your client complaint concerns an administrative matter, such as failure to receive a confirmation, statement or other document you are expecting, or an error in a transaction, please contact GFI at 416.488.8825 or 1.866.955.5300, or by email to info@gfiic.com.

If you have any complaints about your account or services, please document your complaint in writing to:

GFI Investment Counsel Ltd.
Attn: Complaints Officer
1000 – 45 St. Clair Avenue W.
Toronto, ON M4V 1K9
Phone: 416-488-8825
Email: info@gfiic.com (ATTN: Complaints Officer in subject line)

Complaint Resolution Process

GFI will attempt to resolve client complaints in the manner described below:

1. Acknowledgement of your complaint

We will send you a written acknowledge receipt of your complaint within 5 days of receiving your complaint (or within 10 days for residents of Québec).

2. Collect and assess necessary information to understand and evaluate your complaint

We make sure we understand your complaint and may request clarification or additional information to conduct a thorough and prompt investigation.

3. Final Response

We will provide you with a final written response within 60 days. The response will explain how we analyzed your complaint, what led to our decision and where possible, how we came to the proposed resolution of your complaint. Please contact us with any questions or comments regarding our response.

If the processing of your complaint may take longer or be more complex than anticipated, we may require additional time, not exceeding an additional 30 days. We will notify you of this delay and the reasoning as to the extension.

4. Offer to Resolve Complaint

Where an offer is presented, we will give you a reasonable period to review and accept, reject or counter our offer. This period should allow you to seek any advice you may need to make an informed decision. You may decide to accept or refuse the offer or present a counteroffer. Once an agreement has been reached to resolve the complaint, we will implement the resolution within 30 days of acceptance, unless otherwise agreed upon and it is in your best interest.

Resolution Dispute

If you are not satisfied with GFI's resolution you may be eligible for independent dispute resolution services below:

For residents in Canada outside of Québec, you may be eligible to use the independent dispute resolution services offered by the Ombudsman of Banking Services and Investments (OBSI) if you are not satisfied with GFI's resolution or GFI does not resolve the matter within 90 days of you contacting GFI.

The OBSI provides free and independent dispute resolution services to clients who are dissatisfied with their firm's complaint resolution process. Complaints must be submitted within 180 days of receiving a response from GFI to:

Ombudsman for Banking Services and Investments
20 Queen Street West, Suite 2400, P.O. Box 8
Toronto, Ontario M5H 3R3
Phone: 416-287-2877
Toll-free: 1-888-451-4519
Email: ombudsman@obsi.ca

You have the right to OBSI's services if your complaint relates to a trading or advising activity of our firm or by one of our representatives, the complaint was brought to us within 6 years from the time you first knew, or ought to have known, about the event that caused the complaint, and/or if you file your complaint within the time limits described above.

If you are a resident of Québec and you are not satisfied with GFI's resolution, you may file a Complaint and Allegation Reporting Form found on the Autorité des marchés financiers (AMF) website at www.lautorite.qc.ca.

The AMF provides free voluntary mediation services to clients dissatisfied with their firm's complaint resolution process.

Complaint Record Keeping

We maintain a record of all relevant information and documents required for processing your complaint.

Québec residents have a right to request your complaint record be examined by or transferred to the AMF if at any time you are not satisfied with our response or complaint handling process. Complaint records must be sent to the AMF within 15-days of receiving your request to file. The AMF will examine the complaint records and may, with the parties' consent, act as conciliator or mediator regarding the complaint or designate a person to act as such. Applicable Québec securities laws provides that conciliation or mediation may not, alone or in combination, continue for more than 60 days after the date of the first conciliation or mediation session unless the parties consent. Conciliation and mediation are free of charge to you.

Simplified Complaint Process

If you are a resident of Québec, we may follow a simplified process to handle your complaint. Such processes will be used for complaints where we can offer a satisfactory resolution within 20 days of receipt. Under this process, complaints may be referred to a member of our GFI team and handled verbally (ie. in a phone call).

We will consider a complaint to be resolved to your satisfaction when you have accepted our proposed solution to your complaint or when the explanations we provide to you are sufficient to resolve your complaint.

If a complaint cannot be resolved to your satisfaction under this process, we will notify you in writing. The complaint will continue to be processed, but in accordance with the general steps described earlier.

The time we take trying to resolve your complaint under the simplified process does not impact our obligation to provide you with a written response within the required time period.