



Charter of the Office of the National Bank Ombudsman for Clients

Definitions

Definitions	
Bank	National Bank and its subsidiaries
Office of the Ombudsman	The Ombudsman and the employees of the Office of the National Bank Ombudsman for Clients
Ombudsman	Individual appointed as the National Bank Ombudsman for Clients
Client	National Bank retail or commercial client
Commercial client	Body corporate (legal person) that currently has or previously had a business relationship with the Bank
Retail client	Individual (natural person) who currently has or previously had a business relationship with the Bank
Business decision	Decision made by a Bank employee while providing service to a client
Corporate decision	Decision made by the Bank's senior management that has an impact on the Bank's procedures, operations or public communications
Business partner	Third party under contract with the Bank to distribute certain Bank products or services
Complaint	Grievance expressed formally by a client to the Office of the Ombudsman concerning a situation that was not resolved to the client's satisfaction in the context of the client's business relationship with the Bank

National Bank Subsidiaries

NBF	National Bank Financial	NBLIC	National Bank Life Insurance Company
NBI	National Bank Investments	NBIF	National Bank Insurance Firm
NBDB	National Bank Direct Brokerage	NATBANK	Branches of National Bank's subsidiary in Florida
NBT	National Bank Trust	NATCAN	Natcan Trust Company (operating outside Quebec)
NBGI	National Bank General Insurance		

Preamble

The Ombudsman is the highest level at the Bank for handling any complaint that has not been resolved to a client's satisfaction. The Ombudsman's mission is to help settle disputes between the Bank and its clients; in doing so, the Ombudsman has complete freedom of action to fulfill his/her mission and mandate.

The Ombudsman heads the Office of the Ombudsman and makes all decisions. However, certain powers and responsibilities can be delegated to the employees of the Office of the Ombudsman, in particular decisions concerning whether or not to process a complaint, conduct an investigation, obtain any information considered necessary for analyzing a complaint, and issue any conclusion deemed appropriate, including making recommendations.

The Office of the Ombudsman adheres to the codes of ethics of the International Ombudsman Association and the Forum of Canadian Ombudsman. It complies with and applies the ethical principles set out in those codes.

Independence

The Office of the Ombudsman has the discretionary power to take action in any unresolved situation between the Bank and a client once it has been brought to its attention – provided the situation is considered to fall under its mandate – and may issue any conclusion it deems appropriate.

Impartiality

The Office of the Ombudsman refrains from taking sides. Once a complaint has been submitted, the Office of the Ombudsman issues any conclusion that it deems fair and equitable after objectively analyzing the facts, concerns and interests of the Bank and the client.

Confidentiality

The Office of the Ombudsman asks for consent from the client who has submitted a complaint so that all the information and relevant documents for analyzing the complaint can be obtained. It ensures the strictest confidentiality for all communications with the client. It does not and cannot be required to disclose the client's identity or any information that would allow the client to be identified, unless it has received the client's express consent.

The files of the Office of the Ombudsman are protected and remain its property. It cannot be forced to disclose, produce or share them.

Accessibility

The Office of the Ombudsman is not a mandatory step in the complaint settlement process. Any use of its services is voluntary and serves as an alternative to legal proceedings or any other formal recourse. The Office of the Ombudsman does not conduct or participate in any formal procedure or investigation.

Our Mission

Our mission is to offer Bank clients an alternative, accessible and independent recourse mechanism for handling complaints in a neutral, impartial way if the complaint has not already been resolved between the client and the Bank.

Our Mandate

Our mandate is to act as a last resort by investigating complaints submitted by clients concerning the products and services offered by the Bank. For that purpose, we analyze each file impartially and fairly, taking into account the applicable legislation, regulations and industry best practices.

How We Can Help You

The Bank has set up a complaint settlement process that is intended to be simple and accessible for all clients who want to report a situation that was not resolved to their satisfaction in their dealings with the Bank. In all its actions, the Office of the Ombudsman is committed to being respectful, attentive and empathetic. It issues any conclusion that it considers fair and equitable for all parties.

If you have encountered a problem that has not been resolved to your satisfaction in your dealings with the Bank, please follow the procedure below:

Step 1: Contact your business unit

Before contacting the Office of the Ombudsman, you have to make your complaint to the Customer Service Supervisor of the branch, department or subsidiary where you were doing business. The Customer Service Supervisor may be able to resolve the situation to your satisfaction. If you have not completed this step when you contact the Office of the Ombudsman, an advisor will refer you to the appropriate person who can take charge of your complaint.

Step 2: Contact the Office of the Ombudsman

If the situation was not resolved to your satisfaction during the first step, you can submit your complaint to the Office of the Ombudsman in writing or by telephone. An advisor will contact you within two business days to discuss your case.

Although you have the option of contacting the Office of the Ombudsman by telephone, it is strongly recommended that you submit your complaint in writing. By doing so, you will be able to clearly describe the situation you experienced, which will help us gain a better understanding of the facts right from the start of the process and will make it easier to analyze your complaint. Please provide as much detail as possible, such as:

- the order that the events occurred, including dates and descriptions
- the identification of the unit and the names of the employees that you did business with
- any documents that are relevant to the analysis of your complaint
- your expectations concerning the situation you experienced

What the Ombudsman Does Not Do

The Office of the Ombudsman can analyze the process by which a decision was made. However, the Office **does not intervene** in and **does not provide reasons or explanations** about decisions made by the Bank concerning risk management or financial criteria, such as:

- ✘ interest rates and fees applicable to products and services
- ✘ credit decisions
- ✘ eligibility for insurance coverage or the validity of insurance claims
- ✘ termination of business relationships

The Office of the Ombudsman **cannot:**

- ✘ recommend compensation or damages for a bodily injury or non-economic loss (moral injury)
- ✘ issue legal opinions

Certain situations do not fall under the mandate of the Office of the Ombudsman. In particular, it **does not open any files** concerning:

- ✘ corporate decisions
- ✘ situations for which the documents were destroyed following the expiry of the Bank's archive retention time limit (which is generally seven years)
- ✘ situations that are currently or were previously the object of legal proceedings
- ✘ complaints against the Bank's business partners
- ✘ complaints considered abusive or frivolous

Your Commitment

If you take advantage of the services of the Office of the Ombudsman, you are voluntarily choosing a free process that is an alternative to legal proceedings or any other recourse. By opting for this process, you agree to make the following commitments for the entire time that your complaint is being processed.

- ✘ Have a respectful, courteous and reasonable attitude.
- ✘ Conduct an open, honest dialogue in good faith.
- ✘ Actively and transparently cooperate by providing any requested information and documents that are relevant to your file's analysis.
- ✘ Maintain the confidentiality of all discussions and information shared between you, the Office of the Ombudsman and the Bank while your complaint is being processed and after the written conclusion has been issued.
- ✘ In the event of legal proceedings between you and the Bank concerning the complaint being analyzed:
 - › Refrain from using or distributing the communications issued by the Office of the Ombudsman.
 - › Refrain from requiring the representatives of the Office of the Ombudsman to disclose or produce their files or serve as witnesses.

What You Should Know

Processing your Complaint

If your complaint falls under its mandate, the Office of the Ombudsman will send you a consent letter explaining the process, your commitments and the commitments of the Office of the Ombudsman. You will have to sign that letter and return it to us by the specified deadline. Upon receipt of the signed consent letter, we will open a file for you and notify you accordingly.

The Office of the Ombudsman can take up to 90 days to analyze your complaint and issue a conclusion. The time limit is calculated from the date your signed consent letter is received. Once your complaint has been analyzed, we will issue our conclusion to you in writing and explain the subsequent steps that you may take in the complaint settlement process.

Your Cooperation in the Process

Your cooperation is an essential condition for processing your complaint. The Office of the Ombudsman may ask you to provide various documents or explain the relevant facts, conversations or circumstances. By providing all the requested information and documents and having courteous, respectful interactions, you will facilitate the analysis of your complaint.

The Office of the Ombudsman may at any time interrupt its analysis or even decide to close the file if it considers that you have failed to cooperate or have spoken or acted in an offensive, violent or discriminatory manner and have therefore negatively impacted the process underway or the reputation, integrity or security of the Ombudsman and the employees of the Office of the Ombudsman.

Confidentiality and Privacy

Any personal information provided to the Ombudsman is used only for the following purposes:

- determine whether a complaint is admissible
- analyze documents, facts and statements
- develop its final conclusion

Once your complaint has been analyzed, your file is kept in a secure location that is accessible only to the Ombudsman and the employees of the Office of the Ombudsman.

The Office of the Ombudsman does not release any client files or disclose the personal information provided by clients and the Bank unless it is given express consent to do so when the services of an external ombudsman responsible for settling complaints are used or unless there is an imminent danger. Under no circumstances does the Office make comments, give confirmations or otherwise respond to requests from the media about complaints.

Powers and Jurisdiction

The mandate of the Office of the Ombudsman covers the entire Bank. The Office can contact any sector or call on specialists from various fields to obtain the information or documents it considers necessary to analyze complaints.

The Office of the Ombudsman can issue any recommendations concerning:

- ▣ client complaints
- ▣ improvements to Bank products or services
- ▣ the Bank's application of a policy or procedure

At any time during the process, the Office of the Ombudsman can take action to find a solution that is acceptable to the client and the Bank or can make a recommendation to resolve the complaint. If the complaint is resolved, the Bank can require a complete settlement agreement from the client, and the Office of the Ombudsman can facilitate the implementation of the solution. However, the Office of the Ombudsman cannot oblige the client or the Bank to accept its recommendations.

Publications

The Ombudsman submits a semi-annual report and an annual report on processed complaints to the Conduct Review and Corporate Governance Committee of the Board of Directors and to the Bank's Office of the President.

Each year on the Bank's website, the Office of the Ombudsman publicly reports on the number of complaints processed, the average complaint processing time and the number of complaints that it deems to have been resolved to the clients' satisfaction.

To use the services of the Office of the Ombudsman,
you can contact us at any time in writing or
by telephone at:

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