

## Complaint Handling Procedure

The following outlines Echelon Wealth Partners' ("Echelon Wealth") policies and procedures for dealing with complaints. A "complaint" is deemed to include an alleged grievance involving Echelon Wealth or an employee. Examples of a complaint may include:(a) Any written statement, including email or fax, of a client, or any person acting on behalf of a client;(b) Any written or verbal statement from any person alleging: theft, fraud, misappropriation of funds or securities, forgery, money laundering, market manipulation, insider trading, misrepresentation, or unauthorized trading;(c) Any other verbal complaint from a client that will warrant the same treatment as a written complaint.

Complaints should be sent/ directed to the Designated Complaints Officer, Louis Cavalaris at:  
1 Adelaide Street East, Suite 2000, Toronto, Ontario M5C 2V9 OR  
Direct: 416.864.3683 louis.cavalaris@echelonpartners.com

The following process has been put in place relating to the handling of client complaints:1. If the complaint (written or verbal) is deemed to be "service-related", the complaint may be handled directly by the applicable Echelon Wealth supervisor or manager. All securities-related, complaints are handled by the Designated Complaints officer or by qualified Compliance staff.2. Upon receipt of a verbal statement, if the complaint is deemed to be "regulatory-related" Echelon Wealth will request that the client or individual (or person lawfully acting on behalf of the client or individual) provide particulars of the complaint to Echelon Wealth in writing. Echelon Wealth's request for a written complaint may be made verbally or in writing.3. Upon receipt of a written or verbal complaint Echelon Wealth's Compliance Department will immediately record the complaint in the internal compliance complaint log; and send the complaint acknowledgment letter within five (5) business days of receipt of the complaint.4. The compliance department will contact the individuals involved in the complaint and, where appropriate and/or possible, request their information and documentation relating to the matter. Where the complaint involves allegations of serious misconduct or is a legal action, Echelon Wealth's Compliance Department will ensure senior management is aware of the complaint.5. Echelon Wealth's Compliance Department will begin its investigation of the allegations raised in the complaint and communicate the findings/results within 90 days of receipt of the written complaint. With respect to the investigation, Echelon Wealth's Compliance Department will gather the facts, information and documentation in order to properly analyze and consider the complaint.6. Once the investigation has been completed, the response letter will be prepared. Depending on the nature of the complaint, the response will be reviewed by the Designated Compliance Officer and/or Echelon Wealth's legal Counsel if deemed necessary. "Service-related" complaints are those complaints which are founded on customer service issues and which are not the subject of:

- any legislation or law concerning securities or exchange contracts of any jurisdictions, inside or outside of Canada; or
- by-laws, rules, regulations, rulings or policies of any securities or financial services regulatory or self-regulatory organization in any jurisdiction.

"Regulatory-related" complaints are those complaints concerning:

- (i) any matter related to securities or exchange contracts;
- (ii) any matter related to the handling of client accounts or dealings with clients;
- (iii) any matter that is the subject of any legislation or law concerning securities or exchange contracts of any jurisdiction, inside or outside of Canada; or
- (iv) any matter that is the subject of by-laws, rules, regulations, rulings or policies of any securities or self-regulatory organization in any jurisdiction.