C14 – Fair Treatment of Customers

Created	Last Revised
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Approved by	Risk & Compliance Office & CEO

Policy Statement

Grenville Mutual Insurance ("GMI" or the "Company") is committed to protecting your rights. These include the right to be fully informed, to be treated with respect, to timely claims handling and complaints resolution, and to privacy.

Scope

This policy applies to all employees of Grenville Mutual: full time, part time, temporary, volunteer and contract who deal with the public or other third parties on behalf of Grenville Mutual, including when the provision of services occurs off-site.

Policy

Insurance is a two-way contract, and you have a role to play as well. You are responsible for understanding your needs, asking questions, and providing accurate, up-to-date information to your insurer through your agent or broker. For more information about your role, speak to your insurance representative (agent or broker), and read your insurance policy.

1. **Statement of Mutuality and Corporate Culture**

   As a mutual insurance company owned by our policyholders, our customers' long-term security and fair treatment serve as the cornerstone of our corporate culture:
   - Governance: The Board of Directors and Executive Management ensure that fair treatment outcomes are embedded into our strategic planning, operational procedures, and risk management frameworks.
   - Employee Accountability: All employees must act ethically, honestly, and in the best interest of our customers at every stage of the insurance lifecycle.

2. **Right to be Informed**

   You have the right to an easy-to-understand explanation of how insurance works and how insurers calculate prices based on relevant facts:
   - Clear Information: You can expect to access clear information about your policy, your coverage and the claims settlement process.
   - Changes, Cancellations and Renewals: Under normal circumstances, Grenville Mutual will advise you of changes to, or the cancellation of, a policy at least 30 days prior to the expiration of the policy. We are required to provide you with the renewal terms of your policy at least 30 days prior to the expiration date.

- Agent or Broker Compensation: You have the right to know how your broker or agent is compensated, and if they have any conflicts of interest.

3. Right to Privacy

You have the right to understand how your personal information will be used. Grenville Mutual's Privacy Policy is available on our website, and is subject to Canada's privacy laws.

4. **Responsibility to Understand Your Needs**

You are responsible for asking questions and educating yourself about your policy:

- Ask Questions: Make sure you ask all relevant questions and give your broker or agent a detailed explanation of your circumstances to help them make informed recommendations on what your policy should include. This will ensure you have the right coverage for your insurance needs.
- Payment of Your Insurance Premiums: You are responsible for making premium payments as detailed in your insurance policy. Failure to do so could result in a lapse of coverage or cancellation of your policy.

5. Responsibility to Update, and Provide Accurate Information, and Report the Facts

- Accurate & Relevant Information: You are required to provide all relevant information in your application for insurance, and must ensure the information is accurate. If you have questions about your insurance application or policy, contact your broker or agent to ensure you understand your obligations, and the obligations of GMI.
- Change in Circumstances: To maintain your protection against loss, you must promptly inform your agent or broker of any change in your circumstances, such as renovations to your home, or the purchase of a new or additional automobile.
- Timely, Complete & Accurate Details: You must report an accident or claim, providing complete and accurate details as soon as possible.

6. Product Design, Underwriting, and the "Take All Comers" Rule

We design and underwrite our insurance products to match the needs of our customer while minimizing consumer harm:

- Target Market Suitability: Before launching or modifying any property, commercial, farm, or auto insurance product, we validate that it delivers fair value and meets the expectations of the intended consumer.
- Auto Insurance Compliance: In strict accordance with Ontario regulations, we enforce the "Take All Comers" rule. We will provide a timely, legally compliant

automobile insurance quote to any eligible applicant and will not employ restrictive underwriting rules or systemic delays to filter out higher-risk drivers.

7. Clear Promotional Materials and Independent Broker Relations

Because our insurance products are distributed to consumers, we ensure that marketing materials and intermediary relationships support transparent outcomes:

- Plain Language: All marketing materials, digital quotes, and policy summaries must be accurate, clear, and non-misleading. Exclusions, deductibles, and policy limits must be prominently displayed.
- Broker & Agent Oversight: We partner with licensed agents & brokers who share accountability for the fair treatment of our customers. We provide our agents and brokers with up-to-date product knowledge materials and ensure our commission and volume incentives do not create conflicts of interest that prioritize sales volume over the customer’s actual coverage needs.

8. Policy Servicing and Post-Sale Support

We support our customers seamlessly throughout the duration of their policy term:

- Mid-Term Modifications: Policy updates and renewals will be handled efficiently without imposing administrative barriers or penalizing customers for seeking coverage advice.
- Protection of Vulnerable Consumers: In line with the Financial Services Regulatory Authority of Ontario (“FSRA”) expectations, our servicing staff are trained to identify and support vulnerable consumers (e.g., individuals facing cognitive, financial, or language barriers) to ensure they are not disadvantaged.

9. Claims Management and Adjuster Standards

Claims are the primary mechanism through which we deliver on our mutual promise to our customers:

- Fair and Timely Processing: We handle all property, liability, and automobile claims objectively, transparently, and as quickly as possible. We strictly prohibit practices that unreasonably delay payouts, use arbitrary depreciation, or disproportionately deny claims.
- Oversight of Third Parties: Licensed individual adjusters, independent adjusting firms, and preferred vendor networks (e.g., auto repair shops, restoration contractors) are bound by this policy and must respect the customer’s rights under FSRA's Unfair or Deceptive Acts or Practices Rule.

10. Transparent Dispute and Complaint Resolution

Customers have a clear, uninhibited path to voice dissatisfaction:

- Customer Complaint Protocol: We maintain an easily accessible, step-by-step complaint protocol on our website.
- Ombuds Escalation: If a complaint cannot be resolved with the customer's main point of contact, the customer will be provided with written instructions on how to escalate their case to our designated Ombudsperson.

11. Monitoring, Auditing, and Whistle-blower Safeguards

This policy is a living document, subject to regular evaluation:

- Outcome-Based Tracking: We track claims turnaround metrics, policy cancellation rates, agent and broker performance, and complaint trends to actively catch and remediate systemic consumer harm.
- Whistle-blower Protection: In alignment with Grenville Mutual's Safe Disclosure Policy (FSRA's Whistle-blower Guidance), any employee, agent or broker who reports a systemic failure or bad faith practice regarding consumer treatment will be fully protected from reprisal or retaliation.