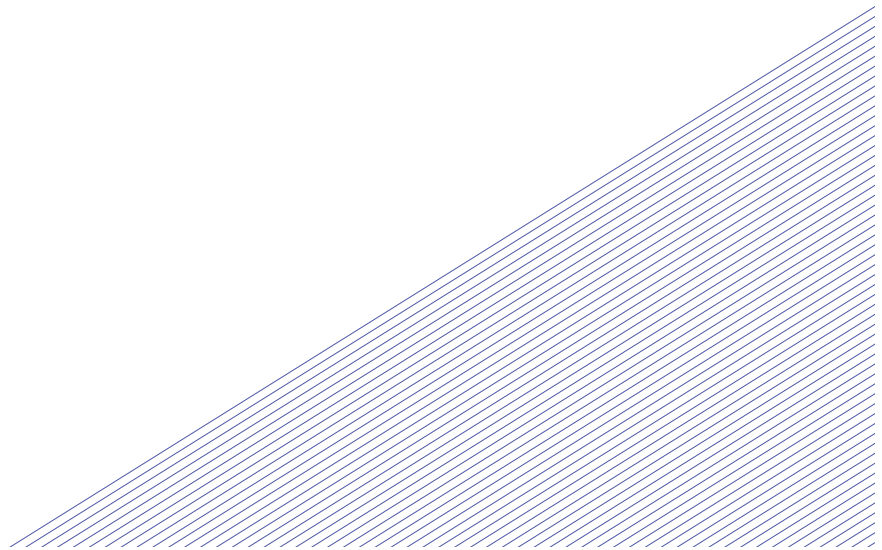


CIDEL FINANCIAL INC. AND CIDEL BANK & TRUST INC. COMPLAINT AND DISPUTE RESOLUTION



COMPLAINTS AND DISPUTE RESOLUTION

Filing a Complaint:

If you have a complaint relating to any services or products offered by Cidel Financial Inc., Cidel Bank & Trust Inc., or Cidel Trust Services Ltd., it must be submitted within six (6) years from the day you first became aware, or should reasonably have been aware, of an act or omission that caused or contributed to the complaint.

Initially, please discuss your concern or complaint with your Cidel representative. If your concern is not resolved satisfactorily, you may contact us in writing, addressed to the Chief Compliance Officer at our Barbados office or via email.

Cidel Financial Inc., Cidel Bank & Trust Inc., or Cidel Trust Services Ltd.

Cidel Place, Lower Collymore Rock,

Saint Michael, Barbados

Fax: +1 246-430-5353

Attention: Chief Compliance Officer

Email: ComplianceDept@cidel.com

Acknowledgment and Resolution:

Cidel will acknowledge your complaint in writing, investigate the matter, and aim to provide you with a formal decision within no later than 30 days of receiving the complaint. This decision may include an offer to resolve the complaint or a denial. During this process, we may ask you to provide additional information or clarification.

Escalation:

If you are dissatisfied with the response from the Chief Compliance Officer, you can further escalate your complaint in writing to Cidel's Dispute Resolution Officer.

Cidel Dispute Resolution Office

60 Bloor St. West, 9th Floor,

Toronto, Ontario, M4W 3B8

Fax: +1 416-925-8192

Attention: Dispute Resolution Officer

Email: DRO@cidel.com

Filing a Complaint with the Barbados FSC:

In circumstances where your complaint is related to regulatory issues within the jurisdiction of the Barbados FSC, you may choose to contact the FSC.

APPENDIX

The Appendix contains detailed information about Cidel's internal complaint handling process, timelines, and guidance on dispute resolution services, including those provided by the Barbados FSC. These procedures are intended to ensure fair and prompt resolution of complaints, and they do not restrict your right to seek mediation or legal remedies at your expense.

WHAT TO DO IF YOU HAVE A COMPLAINT

If you have a complaint, contact:

Cidel Financial Inc., Cidel Bank & Trust Inc., or Cidel Trust Services Ltd.

Cidel Place

Lower Collymore Rock

Saint Michael, Barbados

Fax: +1 246-430-5353

Attention: Chief Compliance Officer

Email: ComplianceDept@cidel.com

You may want to consider using a method other than email for sensitive information.

Explain:

- what went wrong;
- when it happened; and
- what you expect, for example, money back, an apology, account correction.

Cidel will acknowledge your complaint in writing as soon as possible.

You may be asked to provide clarification or more information to help resolve your complaint.

Cidel will normally provide a decision in writing, within 56 days of receiving a complaint. It will include:

- what went wrong;
- when it happened; and
- what you expect, for example: compensation, apology, or account correction.

Cidel will acknowledge your complaint in writing as soon as possible. You may be asked to provide clarification or more

information to help resolve your complaint.

Cidel will normally provide a decision in writing, within 90 days of receiving a complaint. It will include:

- a summary of the complaint;
- the results of our investigation;
- a decision to make an offer to resolve the complaint or deny it; and
- an explanation of the decision.

If we cannot resolve your complaint internally within 10 days from the date we received your complaint, we will notify you of the potential delay, as well as the reason(s) for the delay. If you are dissatisfied with the response from the Chief Compliance Officer, you may escalate your concern to Cidel's Dispute Resolution Officer who will review the complaint independently and will provide a commitment as to the time frame for response. Finally, if the complaint remains unresolved, you have the option to raise your complaint to the Barbados Financial Services Commission (FSC).

Filing a complaint with Barbados FSC

Please be aware that the FSC will not review complaints that:

- Have not been submitted in writing.
- Have been addressed in court or through an alternative dispute resolution process.
- Fall under the regulatory authority of another organization.
- Have previously been reviewed by the Commission.
- Are against non-registered financial institutions.

Complaints that meet the FSC's criteria can be sent to:

Financial Services Commission, Barbados

Bay Corporate Building

Bay Street, St. Michael, Barbados, BB14038

Phone: +1 246-421-2142

Fax: +1 246-421-2146

Email: info@fsc.gov.bb

Visit: <http://www.fsc.gov.bb/index.php/en/2018-02-08-17-16-39/2014-02-13-20-23-43>