

St. Paul Fire and Marine Insurance Company and Travelers Guarantee Company of Canada ("Travelers Canada") are committed to treating all of our customers with the greatest respect and consideration. Notwithstanding our commitment to excellent customer service, on occasion someone may feel they have not been dealt with in a just and fair manner, or there may be a misunderstanding that needs to be resolved. To that end, Travelers Canada has implemented a Complaints Handling Protocol to ensure that complaints are dealt with in a fair and timely manner. The Complaints Handling Protocol provides information on how to file a complaint with the Company, how long the procedures may take, and the next steps for complaints that remain unresolved. When filing a complaint, Travelers Canada encourages you to follow this Complaints Handling Protocol. If you have any questions or concerns regarding this Protocol, or if you require any further information on how to make a complaint, please feel free to contact our Complaints Liaison Officer (800) 330-5033.

COMPLAINTS HANDLING PROTOCOL

When a complaint is received by the Branch, Product Line or Head Office, the staff will request that the Consumer forward the complaint in writing.

The Manager of the product line will investigate the complaint and issue a letter in response to the Consumer within thirty (30) business days. The Manager of the product line will advise the Consumer, that if the Consumer is not satisfied with the Company's position, the Consumer may contact the Complaints Liaison Officer ("CLO") for Travelers Canada.

If the complaint is escalated to the CLO for Travelers Canada, the Consumer will be sent an acknowledgement letter from the CLO within 5 business days advising the Consumer that the CLO is handling the matter, and conducting a thorough investigation. A copy of the Complaints Handling Protocol will be enclosed with the acknowledgement letter. In the event that the CLO requires more information, the CLO will request the required information from the Consumer and advise the Consumer that a final position letter from Travelers Canada will be issued to the Consumer within 30 business days.

The CLO will review the complaint, conduct a thorough investigation, and issue a final position letter to the Consumer within 30 business days. Pursuant to the Insurance Companies Act, Travelers Canada has selected an independent third party, to handle complaints that are not resolved within Travelers Canada's Complaint Handling Protocol. The independent third party selected by Travelers Canada is the General Insurance Ombudsman of the Financial Ombudsnetwork (the "GIO").

In the final position letter issued by the CLO, the CLO will advise the Consumer that if the Consumer is not satisfied with Travelers Canada's final position, the

Consumer is free to contact the GIO:

General Insurance OmbudService (GIO)
10 Milner Business Court
Suite 701
Toronto, Ontario
M1B 3C6
Telephone: (416) 299-6931 or national toll free (877) 225-0446

If the Consumer chooses to contact the GIO to resolve the complaint, the GIO may conduct a 90 minute mediation session and issue a report.

If the complaint is domiciled in Ontario the CLO will also advise the Consumer in the final position letter that the Consumer is free to contact the Ontario regulator:

The Office of the Insurance Ombudsman
Insurance – Consumer Complaints Division
Financial Services Commission of Ontario
Box 85, 5160 Yonge Street
North York, Ontario
M2N 6L9

If the complaint is domiciled in Quebec, the CLO will also advise the Consumer in the final position letter that the Consumer is free to contact the Autorite Des Marches Financiers (“AMF”):

Autorite Des Marches Financiers
Direction de l’encadrement de l’assistance aux consommateurs
Place de la Cite, Tour Cominar
2640, boulevard Laurier, bureau 400
Sainte-Foy, Quebec
G1V 5C1

The CLO will also advise the Consumer that if the Consumer is not satisfied with the final position provided by the CLO, the Consumer has the right to request that the complaint file be transferred to the AMF within one year of receipt of the final position letter. In addition, the CLO will advise the Consumer that the AMF may offer mediation, if it deems it appropriate in the circumstances, and the parties agree. Further, the Consumer will be advised that the filing of a complaint with the AMF does not interrupt the prescription relating to his or her recourses before the civil courts.

If your complaint involves a consumer provision of the Insurance Companies Act, please feel free to contact the:

Financial Consumer Agency of Canada

427 Laurier Avenue West
6th Floor
Ottawa, Ontario
K1R 1B9
Telephone: Toll Free: (866) 461-3222
Facsimile: Toll Free: (866) 814-2224