



Goodwood Inc.

Complaint Handling Procedures

Feedback from clients, both positive and negative, provides useful information about how well Goodwood is accomplishing its goal of operating a viable/desirable Investment Dealer. As a client complaint may point to a significant weakness in the operation of the firm, complaints are taken very seriously.

Definition of a Complaint

A complaint includes:

- a) A recorded expression of dissatisfaction with Goodwood or one of its employees or agent which alleges misconduct.
- b) A verbal expression of dissatisfaction alleging misconduct where upon investigation it appears that the allegation has merit.

Complaint Handling

Once a complaint (either verbal or in writing) is received by the Chief Compliance Officer (“CCO”), who is also the Designated Complaint Officer of the firm, the CCO will take all actions required to assemble any material (trade blotters, client correspondence and so forth) necessary to fully understand the issue. The CCO will thoroughly review the material and interview all parties deemed relevant in order to determine the merits of the case and conduct a fair and thorough investigation. This investigation will be completed as soon as possible, but no later than 90 calendar days from the date of receipt of the complaint.

Complaint Acknowledgement Letter

Goodwood will send an acknowledgment letter to the complainant within five business days of receipt of the complaint. This letter will include the following:

- a) The name, job title, and full contact information of the person handling the complaint (the CCO);
- b) A statement indicating that the client should contact that individual if they would like to inquire about the complaint;
- c) An explanation of Goodwood’s internal complaint handling process, including the role of the Designated Complaints Officer;
- d) A copy of the “An Investor’s Guide to Making a Complaint” brochure along with reference to the Statute of Limitations mentioned within the brochure;
- e) Reference to the 90 calendar day timeline to provide a substantive response; and,
- f) Any preliminary request for information from the client will also be included at this time.



Complaint Response Letter

As mentioned above, Goodwood will send a substantive response letter to the client as soon as possible, but no later than 90 calendar days. If this is not possible then both the client and the Investment Industry Regulatory Organization of Canada (“IIROC”) will be advised of the delay, the reason for the delay and a revised timeline for completion.

The substantive response letter will include the following information:

- a) A summary of the complaint;
- b) The results of Goodwood’s investigation;
- c) Goodwood’s final decision on the complaint and an explanation of same; and,
- d) A statement outlining the options available to the client if he/she is not satisfied with our response, including:
 - Arbitration,
 - The service provided by the Ombudsman for Banking Services and Investments,
 - Submitting a regulatory complaint to IIROC,
 - Civil litigation, and
 - Any other applicable options.

Contact Information

Goodwood is committed to resolving your concern in a fair and timely manner. Should you have a concern or complaint with our products or services, please advise us of the situation by contacting:

Katie Sherkey, Chief Compliance Officer/Designated Complaints Officer
Goodwood Inc.
212 King St West, Suite 200
Toronto, Ontario M5H 1K5
Phone: 416-203-2012
Fax: 416-203-0734
Email: ksherkey@goodwoodfunds.com

The Designated Complaints Officer will take all actions required to assemble material necessary to fully understand your issue and formulate a recommended solution in a timely manner.