

DISPUTE RESOLUTION POLICY

Purpose:

The First Nations Lenders' Authority ("FNLA") understands that disputes and/or conflicts may arise between a Borrower and a Lender, i.e. the "Parties" to a "Consumer Loan Agreement". Thus, a Borrower or Lender who encounters a problem may use the procedures explained below to resolve or clarify their concerns. It is the FNLA's intention to respond to any complaints it receives in an expeditious manner and will review each complaint in accordance with the procedures set out below. Step 2 is the focus of this Policy.

Dispute Resolution Process: In lieu of the exclusion of arbitration provisions contained in the "Consumer Loan Agreement", the "Parties" thereto agree that in the event of a dispute and/or a conflict arising therefrom, the Parties shall take the following steps to attempt to resolve any such dispute and/or conflict.

Procedures:

Step 1: Conversation with the Borrower

- a. Firstly, the Borrower shall contact the Lender directly in the event of a dispute and/or conflict in an attempt to seek resolution thereof. Upon receipt thereof, the Lender will do everything within its power to resolve the dispute and/or conflict in an expedited manner:
- b. The Lender shall provide a written response to the Borrower within five (5) business days of receipt of the Borrower's complaint.

Step 2: Written Complaint to the FNLA

- a. If the conversation with the Lender does not resolve the dispute and/conflict to the mutual satisfaction of the Parties, or if the Lender does not respond to the Borrower, the Borrower may submit a written complaint to the FNLA, to have the dispute and/conflict decided according to the FNLA's dispute resolution process adopted specifically for complaints filed by individual Borrowers. This dispute resolution process can occur remotely with the complainant submitting documentation to the FNLA, according to the procedure outlined on the FNLA's website at www.fnla.ca;
- b. The submission of the written complaint by the Borrower is due within five (5) business days of the receipt or non-response from the Lender. The complaint should include:
 - The date the dispute and/or conflict occurred
 - Suggestions on ways to resolve the dispute and/or conflict
 - A copy of the written response or a summary of any verbal responses received from the Lender;

- The date the Borrower contacted the Lender and whether the Lender provided no response should be stated in the written complaint.
- c. Upon receipt of the Borrower's written complaint, the FNLA will engage with the Complainant (Borrower) within five (5) business days to discuss the complaint.
 - d. Within five (5) business days following the discussion with the Complainant (Borrower), the FNLA will issue a written decision to the Borrower who has filed the complaint.

Step 3: Courts of the Province of Quebec

- a. In the event that Steps 1 and/or 2 herein have not resulted in a resolution of any dispute and/or conflict involving the Borrower and the Lender, to the satisfaction of each of the Parties to the "Consumer Loan Agreement", within a delay of sixty (60) days dating from the receipt of the complaint by the "**FNLA**", the Borrower shall then have the option, as part of the present "due process", to file a complaint with the Courts of the Province of Quebec having jurisdiction in this matter;

Additional Assistance:

How do I submit a complaint to the FNLA:

Any complaints related to a Lender that has been certified by the FNLA must be submitted in writing by the Complainant (Borrower) to the FNLA at the following email address: complaints@fnla.ca.

The FNLA will respond to all complaints it receives in an expeditious manner and endeavors to find appropriate solutions between the Complainant (Borrower) and a Certified Lender.

Governing Law:

As part of the "Dispute Resolution Process", the parties hereto further agree that the Lender is a Mohawk or First Nations entity, located on the Mohawk Territory of Kahnawake and is subject to the laws of Kahnawake and those of the First Nations of Canada. The parties further attorn to the Courts of the Province of Quebec as the sole and exclusive jurisdiction to file court-related proceedings before a court of justice to decide the final outcome of any dispute and/or conflict, when all else provided within the "Dispute Resolution Process" has failed.

Time Limits:

If a Complainant (Borrower) fails to escalate his or her complaint from one (1) step to the

next step of this procedure within the time limits set forth above, the dispute and/or conflict will be considered resolved on the basis of the prior decision, and the complaint will not be subject to further consideration.

Only Individual Complaints will be Considered:

Given that disputes and/or conflicts are better resolved on an individual basis, this "Dispute Resolution Process" may only be initiated by an individual Borrower and not by a group or collection of Borrowers. Moreover, all complaints must be made in good faith.

FNLA Disciplinary Action:

The FNLA reserves the right to impose appropriate disciplinary action for any conduct by a Certified Lender, that the FNLA deems to be inappropriate or contrary to applicable laws. The events leading up to each dispute and/or conflict may differ, and the level of disciplinary action may also vary, depending on such factors as the nature of the infraction, whether it is repeated, the work record of the Certified Lender and the impact of the conduct on the FNLA and the lending industry in the Mohawk Territory of Kahnawake.