

September 24, 2020

FSRA  
Financial Services Regulatory Authority of Ontario  
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Toronto, ON  
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To Whom It May Concern:

We applaud the Financial Services Regulatory Authority of Ontario for making *Treating Insurance Customers Fairly* a mandate.

We support the guidance created by Canada's insurance regulatory associations (CCIR and CISRO).

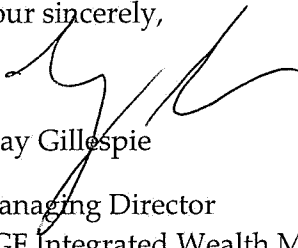
We do however have some serious misgivings regarding the current and future implementation of this guidance. We believe it is untenable to be regulated by a "product supplier" as the conflicts of interest inherent in this model are impossible to avoid under the current supervision structure.

- Each insurance company tends to have their own rules and policies that they've developed in accordance with this guidance. We would suggest that all the carriers adopt the same rules and not make individual decisions based on their interpretation of this guidance and business model.
- The current life insurance carrier audits that we have had so far have assumed that our entire business model should be directed on selling risk management products. There has been overreaching in how they interpret the guidance.
- These audits should not be at the individual carrier level as you can and do have more than one audit in any year with different interpretations of the guidance from each carrier.
- The insurance companies have done little to deal with the current conflicts of interest that exist in the insurance industry today. The various overrides offered to different advisors to support the sales of their products over other insurance companies is a huge conflict of interest.

- There is no mechanism to handle disputes with the insurance companies. Given the individual nature of how this guidance is being interpreted at the various insurance companies, there needs to be a dispute resolution process put in place.

Currently this guidance is contractual in nature so we can choose to follow a company's rules or not by not dealing with that company. Once you make this a regulatory issue then the disjointed nature of how this guidance is currently being implemented becomes much more difficult to navigate.

Your sincerely,



Clay Gillespie

Managing Director

RGF Integrated Wealth Management