

Dispute Resolution Policy

1. Purpose

This policy identifies Plan administration matters that may be subject to an informal or administrative review, as set out below, by whom such reviews may be initiated, and the procedures for completing such reviews.

2. Definitions

- a. "administrative review" refers to IMAC's process of reviewing an individual's entitlements under the Plan, with the Corporation making the final decision based on IMAC's recommendation;
- b. "Applicant" means
 - i. an individual who is a member of the Plan; or
 - ii. an individual who is entitled, or believes they are entitled to a benefit under the Planand who initiates the review process contemplated below;
- c. "Board" means the Board of Directors of the Corporation;
- d. "Client Services Advocate" or "CSA" means the Service provider's Client Services Advocate;
- e. "Corporation" means PSPP Corporation;
- f. "CPO" means the Chief Pension Officer (or delegate) of the Corporation;
- g. "informal review" means the process by which the CSA makes a determination with respect to a review initiated by an Applicant;
- h. "IMAC" means the Service provider's Issues Management Advisory Committee;
- i. "Plan" means the Public Service Pension Plan;
- j. "Policy" means this Dispute Resolution Policy for the Public Service Pension Plan, which has been established under section 19.02 of the Plan;
- k. "Service provider" means the Alberta Pensions Services Corporation.

3. Right to a Review

Individuals who disagree with the Service Provider's interpretation or application of Plan provisions, or its failure to make a determination, regarding their entitlements under the Plan may request an informal review as per this Policy. If unsatisfied with the result of the informal review, they may request an administrative review, in accordance with this Policy.

An individual may not request a review on the grounds that the terms of the Plan ought to be changed. Only an Applicant may initiate the review process.

4. Restrictions on Remedies Available Under this Policy

No resolution under this Policy shall award or provide any benefits or remedies unless:

- a. it is expressly provided for or permitted by the Plan; and
- b. it is consistent with relevant legislation, including the Joint Governance of Public Sector Pension Plans Act, the Employment Pension Plans Act, the Income Tax Act (Canada), and other relevant pension legislation, as amended from time to time.

5. Confidentiality

All documents created in connection with a review initiated pursuant to this Policy will be treated as confidential and used solely for the purpose of completing the review.

6. Delivery of Documents

All documents submitted as part of an administrative review shall be delivered by email or in another form acceptable to the Corporation.

7. Process

A two-step process is established for individuals who disagree with an interpretation or application of Plan provisions made by the Service provider.

Step 1: Informal Review

If an individual disagrees with the Service provider's interpretation or application of Plan provisions as it relates to such individual, the individual may request an informal review of such interpretation or application of Plan provisions, by the Client Service Advocate (CSA).

The CSA will review the Applicant's request and provide the Applicant an initial response within 5 business days. The Applicant will be informed of further timelines required to investigate the request depending on the complexities.

If the informal review results in an agreement that resolves the matters in issue, in whole or in part, the Service provider must document that resolution in writing and retain for internal records.

Step 2: Administrative Review

If unsatisfied with the informal review outcome, the Applicant may, request an administrative review by IMAC within 60 days of receiving the CSA's determination. The written request must include a detailed explanation of the objections to the decision, a description of any believed related errors or omissions, and a statement of the relief sought.

IMAC will review the submission and recommend a decision to the CPO within 60 days. Within 30 days of receiving the recommendation from IMAC, the CPO will review the Applicant's submission and IMAC's recommended decision.

If the CPO requests further clarification from IMAC, IMAC will provide the information within 30 days.

If the CPO supports IMAC's recommendation, the CPO will communicate a decision to the Applicant within a reasonable amount of time, clearly addressing the basis of the decision and its reasons.

If the CPO does not support IMAC's recommendation, the CPO may:

- a. direct IMAC to reconsider part or all their recommendation; or
- b. refer the matter to the Board for resolution. In such cases, the CPO will inform the Applicant and IMAC of the expected timelines for the Board's decision.

8. Reserve Power of the Board

Notwithstanding the above, the Board reserves the power to decide any particular administrative review. The Board also reserves the right to delegate to a different committee of the Board the power to decide any administrative review.