

September 25, 2020

Mark White
Chief Executive Officer
Financial Services Regulatory Authority
130 Adelaide Street West, Suite 800
Toronto, ON, M5H 3P5

Submitted via website submission: <https://www.fsrao.ca/engagement-and-consultations/common-approach-treating-insurance-customers-fairly>

Re: A Common Approach to Treating Insurance Customers Fairly

Dear Mr. White,

I am writing in response to the open consultation on establishing a common approach to treating insurance customers fairly.

Manulife commends the leadership of the Financial Services Regulatory Authority (FSRA) on ensuring insurance licensees are clear as to which standard to follow. We are supportive of the approach to distinguish that insurers are subject to follow the *Guidance: Conduct of Insurance Business and Fair Treatment of Customers* adopted jointly by the Canadian Council of Insurance Regulators (CCIR) and the Canadian Insurance Services Regulatory Organizations (CISRO), while mortgage brokering, loan and trust, and credit union and caisse populaire sectors be subject to follow the *Superintendent's Guideline No. 03/18: Treating Financial Consumers Fairly* issued by FSRA's predecessor.

Harmonization across provinces reduces burden for insurance agents and companies and will support them in serving their customers.

Manulife looks forward to continuing to collaborate with FSRA and the CCIR in securing outcomes that allow us to provide the insurance solutions that Ontarians want and need.

Yours very truly,



Chris Donnelly
Vice President & Counsel, Regulatory & Public Affairs