

In the Matter of the

FINANCIAL INSTITUTIONS ACT, RSBC 1996, c.141
(the “Act”)

and the

INSURANCE COUNCIL OF BRITISH COLUMBIA
 (“Council”)

and

BARZIN ASSADI
(the “Licensee”)

ORDER

As Council made an intended decision on September 16, 2025, pursuant to sections 231 and 241.1 of the Act; and

As Council, in accordance with section 237 of the Act, provided the Licensee with written reasons and notice of the intended decision dated October 29, 2025; and

As the Licensee has not requested a hearing of Council’s intended decision within the time period provided by the Act;

Under authority of sections 231 and 241.1 of the Act, Council orders that:

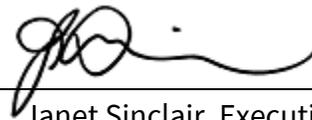
1. The Licensee is fined \$2,000, to be paid by February 16, 2026;
2. The Licensee be required to complete the following courses, or equivalent courses as approved by Council, by February 16, 2026:
 - i. The Council Rules Course for General Insurance Agents, Salespersons and Adjusters;
 - ii. The Nominee Responsibilities and Best Practice course for General Insurance Agents and Adjusters; and

- iii. The Privacy Compliance – How to Protect Your Brokerage, Part 1 and Part 2 courses, available through the Insurance Brokers Association of British Columbia

(collectively, “the Courses”);

3. The Licensee is assessed Council’s investigation costs of \$2,625, to be paid by February 16, 2026; and
4. A condition is imposed on the Licensee’s general insurance licence that failure to complete the Courses and pay the fine and investigation costs by their deadlines will result in the automatic suspension of the Licensee’s licence, and the Licensee will not be permitted to complete his 2027 annual licence renewal until such time as the Licensee has completed the Courses and paid the fine and investigation costs in full.

This order takes effect on the **17th day of November, 2025.**



Janet Sinclair, Executive Director
Insurance Council of British Columbia

INTENDED DECISION

of the

INSURANCE COUNCIL OF BRITISH COLUMBIA

(“Council”)

respecting

BARZIN ASSADI

(the “Licensee”)

1. Pursuant to section 232 of the *Financial Institutions Act* (the “Act”), Council conducted an investigation to determine whether the Licensee had acted in compliance with the requirements of the Act, Council Rules, and Code of Conduct regarding allegations that he had improperly dealt with confidential client information, and that he had a prominent leadership role in an unlicensed company that had held itself out online as able to offer insurance services. Additionally, it came to Council’s attention in the course of its investigation that the Licensee had failed to notify Council of discipline by another regulator.
2. On July 18, 2025, as part of Council’s investigation, a Review Committee (the “Committee”) comprised of Council members met via video conference to discuss the investigation. The Licensee attended the meeting for an interview with the Committee, as did his colleague (“Licensee L”) and their legal counsel. An investigation report prepared by Council staff was distributed to all attending parties prior to the meeting. Having reviewed the investigation materials and discussed the investigation, the Committee prepared a report for Council.
3. The Committee’s report, along with the aforementioned investigation report, was reviewed by Council at its September 16, 2025, meeting, where it was determined the matter should be disposed of in the manner set out below.

PROCESS

4. Pursuant to section 237 of the Act, Council must provide written notice to the Licensee of the action it intends to take under sections 231 and 241.1 of the Act before taking any such action. The Licensee may then accept Council’s decision or request a formal hearing. This intended decision operates as written notice of the action Council intends to take against the Licensee.

FACTS

5. The Licensee has been licensed with Council since 2010 and is currently a level 3 general insurance agent (“Level 3 Agent”). He is currently the nominee and director of an agency (the “Agency”) that has been licensed with Council since April 2023.
6. Council’s investigation explored allegations made against the Licensee by a former employer (the “Former Employer”), which included that the Licensee had engaged in breaches of confidentiality, specifically in regard to confidential information relating to the Former Employer’s clients, and that he was a manager of a business (the Agency) that was offering insurance services without being licensed to do so. Additionally, it came to Council’s attention in the course of the investigation that the Licensee had been disciplined by the General Insurance Council of Manitoba (the “GICM”) in June 2023, but had not notified Council as required by the Council Rules.

Website Issues

7. While still working for the Former Employer, the Licensee became involved with a startup technology company (the “Technology Company”) that was incorporated in 2020. According to the Licensee, it was never intended that the Technology Company would sell insurance or other products. When the Licensee and his colleagues at the Technology Company eventually decided to sell insurance, they created the Agency. The Agency would become licensed with Council in April 2023.
8. Although the Agency was not licensed with Council until April 2023, its website was accessible by the public at various times throughout 2022. In June 2022, Council staff conducted a review of the Agency’s website, making observations that included:
 - a. The website contained statements such as “Finally, a fast and easy way to get the best home insurance coverage in BC. 90 seconds is all it takes.”
 - b. The website described how AI could help provide simple and affordable home insurance coverage, and that “Kylie,” an AI agent, could show clients the best insurance rate options.
 - c. The website described the Agency as an “online insurance brokerage” and noted that its AI could provide quotes, customize policies, and activate coverage.
 - d. The website stated “Using powerful Artificial Intelligence (AI) technology, [the Agency] revolutionizes the home insurance buying process.”
 - e. The website contained a testimonial from a purported customer that stated “Wow, someone finally figured out how to make this process not suck.”
 - f. The website allowed for completion of an application, up until the point of being asked to provide payment details.

the summer of 2022. It was submitted that neither the Licensee nor Licensee L were aware that the website had been made publicly available until November 2022, when Council's investigator brought the issue to their attention. At that point, the Licensee and Licensee L took immediate action to ensure that the website was made inaccessible.

16. It was submitted by their legal counsel that the Licensee and Licensee L had been forthright and honest throughout Council's investigation, and that their description of the website as not being "operational" was not a misrepresentation. "Not operational," in the sense intended by the licensees, meant that the website was under construction and that applications could not be completed or finalized; they had not intended to imply that the website had not been accidentally made publicly accessible. It was submitted that there was no payment vendor set up for the Agency website at that point, and that it would have been impossible for an application to be completed and paid for. The first full transaction completed on the website occurred in November 2023, after the Agency had become licensed with Council.
17. The Licensee's legal counsel noted that there had been very little traffic to the website during the period of time when it had accidentally been made public, and referred to the Intelligence Firm's findings in support of this claim. The number of visits to the website was low, and the geographical information about visitors correlated with where members of the design team were located.
18. It was the position of the Licensee and Licensee L that the website had been publicly accessible over two distinct periods of time in 2022. The first was between May and July 2022, and the second was in November 2022. The Licensee and Licensee L were made aware by Council's investigator in November 2022 about the website being accessible, and immediately took action to make it private again. They did not learn about the earlier May to July 2022 period until the investigation report had been received from Council, and had been under the assumption that only persons with permissions had been able to access the website during that time.
19. When asked by the Committee to clarify whether there had been two distinct periods of public accessibility, or if the website had been public continuously between May and November 2022, the Licensee stated that he believed it to have been two distinct periods, based on information that the Agency's Chief Technology Officer at the time had given him.
20. It was submitted to the Committee that the "testimonials" that had been on the website during its construction phase were not actual testimonials from real clients, but were only placeholders that were intended to be (and ultimately were) replaced by legitimate testimonials from real clients once the Agency was licensed and the website became operational. The Licensee's legal counsel emphasized that the client "testimonials" on the website during its construction phase were not an indication that the Agency had been conducting insurance business while unlicensed. The Agency's profit and loss records from the relevant time period were also referred to, as evidence that the Agency had not profited prior to becoming licensed.
21. When asked about why the Terms and Conditions section of the Agency's website appeared to have been taken from another agency's website, the Licensee and Licensee L submitted that neither of

them had been aware that those Terms and Conditions had been used, and that they must have been put on the website as a placeholder by a member of the design team. They explained that original Terms and Conditions have since replaced the placeholder content.

22. When questioned by the Committee about whether the Licensee and/or Licensee L, given their roles in the Agency and the Technology Company, should have realized that the website was public for periods of 2022, their legal counsel emphasized that neither had been experienced with start-up businesses at the time, and that they had only been involved with the Agency on a part-time basis. It was submitted that, if the Licensee and Licensee L had had in 2022 the amount of experience with start-ups that they do now, they would likely have been more directly involved with the website creation and would likely have caught that it had been made public, or prevented it from being made public altogether.
23. When moving to the topic of the confidentiality-related allegations against the Licensee, his legal counsel submitted that the Licensee had not improperly sent information to his personal Gmail account. Of the disputed emails, she argued that the majority had nothing to do with the Former Employer's business or clients, and that it had been appropriate for the Licensee to move them from his email account with the Former Employer to his personal email account.
24. The Licensee and his legal counsel acknowledged that two of the disputed emails did involve information relating to the Former Employer's clients. These emails were both sent in March 2021 and related to the same client. It was submitted that the Licensee would not normally have forwarded this type of email to his personal email account. The Licensee had no recollection of why he had done so; his legal counsel suggested that it had likely been done inadvertently, and that there was no benefit to him from forwarding these two emails to his Gmail account. Although the forwarded documents contained client information such as addresses, it was argued that the information was "not particularly sensitive." When asked by the Committee as to how he had inadvertently sent the same client's information to his Gmail account on two separate occasions, the Licensee stated that he may have been attempting to send them to another representative of the Former Employer but that the auto-populate feature may have entered his own Gmail address rather than the intended address.
25. In regard to the failure to notify issue, the Licensee's legal counsel stated that the Licensee had intended to provide Council with notice of his Manitoban discipline after receiving a payment acknowledgment letter from the GICM.

ANALYSIS

26. Council's opinion is that the Licensee's conduct amounted to breaches of the Council Rules and Code of Conduct.
27. Council believes that Council Rule 7(1), which requires licensees to "*hold in strict confidence all information ... concerning the personal and business affairs of a client, and ... not divulge or use any such information other than for the purpose of that transaction*" to have been breached due to the

Licensee's forwarding of at least two emails containing client information to his personal email address. Council considered this Rule breach to be relatively minor, but noted that it was made worse due to aggravating factors discussed in more detail below. Council accepted that most of the emails that had been flagged by the Former Employer in its allegations against the Licensee did not contain client information that was inappropriate to send to his personal email address.

28. Rule 7(3), which requires licensees to notify Council within five business days when they have been disciplined by *"any financial sector regulator, or any professional or occupational body"* has clearly been breached. The GICM's decision regarding the Licensee was dated June 28, 2023. No notice was provided to Council by July 17, 2023, on which date Council's investigator reached out to the Licensee about the matter. The Licensee told Council's investigator, and made similar submissions to the Committee, that he had been waiting for a payment acknowledgement letter from the GICM, and that he intended to notify Council once he had received that document. Council does not accept that as a valid reason for failing to provide notice within five business days, as Rule 7(3) requires. Again, although Council considered this Rule breach to be relatively minor, it was exacerbated by aggravating factors that will be discussed further.
29. As for the Code of Conduct, Council's conclusion is that the Licensee has breached section 4 ("Good Faith"), section 5 ("Competence"), section 7 ("Usual Practice: Dealing with Clients"), and section 10 ("Usual Practice: Dealing with the Public").
30. The Licensee's involvement with the issues relating to the Agency's website is most notably a breach of Code of Conduct section 10, which requires that *"You must honestly represent yourself and the services and products you provide so as not to mislead the public."* More specifically, subsections of section 10 require that *"You must hold yourself out in the manner in which you are licensed"* (10.3.1), *"You must not make any false or misleading statements in the solicitation of or negotiation for insurance"* (10.3.6), and *"You must not engage in misleading advertising by offering ... products or services you cannot reasonably provide"* (10.3.7). Although it was in error that the Agency website was made accessible to the public, Council's opinion is that the Licensee should have taken greater care to ensure that the unlicensed company he had a prominent leadership role in was not improperly advertising itself as a provider of insurance services, or otherwise publishing misleading marketing information.
31. Council believes that the website issues, the client confidentiality issues, and the failure to notify issue, considered together, amount to a breach of Code of Conduct section 5, which requires that licensees *"must conduct all insurance activities in a competent manner."* Council's opinion is that the Licensee has shown a failure to meet the standard of practice *"which a reasonable and prudent licensee in similar circumstances would exercise"* (5.3.1). Similarly, the website and confidentiality issues amount to a breach of Code of Conduct section 7, which requires that licensees *"protect clients' interests and privacy"* (7.2) and that they *"must not use sales materials or illustrations that are misleading or unnecessarily confusing"* (7.3.7). Finally, Council concludes that the Licensee's act of sending client information to his personal email address breached Code of Conduct section 4, which states that *"unauthorized access, use or disclosure of confidential information"* (4.3.1(c)) reflects on a licensee's intention to practice in good faith.

PRECEDENTS

32. Prior to making its decision, Council took into consideration several of its past decisions involving licensees who had privacy/confidentiality issues identified in their practice, as well as past decisions that involved website misrepresentations.
33. [Randy David Carroll & Apollo Insurance Agency Ltd. & Apollo Insurance Solutions Ltd](#) (June 2025) concerned two general insurance agencies and their nominee. Between 2021 and 2024, the website belonging to the agencies misrepresented them as being an insurance company, with descriptions such as “*a new kind of insurance company*” and “*Canada’s leading online insurance company.*” Council first brought the issue to the agencies’ attention in 2021, via a reminder letter. A second reminder letter was issued later in 2021. At the time of their Review Committee meeting in November 2024, the website still contained at least one description of the agencies being an “*insurance company.*” Council fined the agencies \$20,000 (jointly and severally) and the nominee \$5,000; required the nominee to take courses and downgraded his licence from level 3 to level 2 for a year; and assessed the agencies investigation costs (jointly and severally).
34. [Tuoi Thi \(Julie\) Ngo](#) (February 2023) concerned a former life and accident and sickness (“Life Agent”) licensee who published online marketing materials emphasizing investment and other services that were determined to include misrepresentations by the former licensee and unlicensed companies controlled by the former licensee. Council determined that the former licensee’s misrepresentations posed an ongoing public risk, because if members of the public were misled into engaging in investment or other business activities with the former licensee based on the claims made online, financial harm could result. In its intended decision, Council noted concerns about competency issues with the former licensee in addition to problems of intentional dishonesty. Council ordered that it would not consider any application for an insurance licence from the former licensee for five years (she had voluntarily cancelled her licence prior to Council making an order), fined her \$12,500, and assessed investigation costs.
35. [Jennifer Lai Yee Chiu](#) (December 2022) concerned a level 2 general insurance agent (“Level 2 Agent”) who took client information from an insurance agency she previously worked at and contacted clients in order to transfer them to another agency. Council determined that the licensee’s actions amounted to unauthorized access and use of confidential client information, as she lacked express written consent from clients to retain and use their personal information. Additionally, there were credibility issues with the licensee and several aggravating factors, including contradictory statements given during the investigation. Council ordered that the licensee be fined \$4,000, required to complete the Council Rules Course and a privacy course, and assessed investigation costs.
36. [Rodney Gillis Tidsbury](#) (August 2022) concerned a Level 2 Agent who was found to have disclosed the confidential information of a client without their consent. The client had sought an insurance quote relating to a particular property; when later asked questions about the property by a realtor, the licensee provided information that he should have kept in confidence. Council noted that the licensee did not intentionally disclose confidential client information, but still failed to hold it in strict

confidence. Council fined the licensee \$1,000, required him to complete the Council Rules Course and a privacy course, and assessed investigation costs.

37. [Kai Di Zhu](#) (December 2021) concerned a Level 2 Agent who used her previous broker credentials from her former employer to access an insurer's proprietary insurance portal. Council found that her unauthorized accessing of the portal was a breach of trust. Council ordered the licensee to complete the Council Rules Course and an ethics course, and assessed investigation costs.
38. [Barzin Assadi](#) (September 2021) concerned the Licensee, who, as a Level 2 Agent at the time, was found to have not treated confidential client information with adequate care as he transitioned from a prior employer to a new employer. Concerns about the Licensee's handling of confidential client information included his storing of such information on a personal device, his co-mingling of client information with his own personal information and documents, and his failure to put password protection or other safeguards in place. Council fined the Licensee \$2,000, required him to complete the Council Rules Course and a privacy course, and assessed investigation costs.
39. [Prestige Insurance Services Ltd. DBA Perpetual Insurance Services and Alexander Hamilton Cheung Hin Nam](#) (May 2020) concerned an agency and its nominee who were investigated following an incident in which three boxes of insurance business documents were accidentally left behind in a temporary office that the agency had occupied while its usual office was being renovated. The agency and the manager in charge of responding to the incident reacted promptly and responsibly by making immediate efforts to retrieve the documents, co-operating with the Insurance Corporation of British Columbia, reporting the incident to the Office of the Information and Privacy Commissioner, posting a notice for clients on the agency website, and implementing new procedures to prevent a similar incident in the future. Nevertheless, Council concluded that the mistake had put client information at risk and warranted a reprimand of the agency. Additionally, the nominee was required to complete the Council Rules Course and a privacy course, and the agency was assessed costs.
40. [Jason Robert Verbeke](#) (April 2018) concerned a Level 2 Agent who, upon leaving an agency he worked for, took a spreadsheet that contained client information. Council accepted that the licensee believed the clients were "*his own*," but because he had serviced them as a representative of the agency, he should have sought the consent and permission of both the agency and the clients themselves before keeping their personal information following his departure. Council fined the licensee \$2,500, required him to complete the Council Rules Course and a privacy course, and assessed investigation costs.
41. [Grant Sheldon Persall](#) (May 2014) concerned a Life Agent who promoted a particular strategy to potential clients by creating brochures and distributing them. One brochure include the provincial government's logo along with the slogan "*The Best Place on Earth*," as well as the logos of the Royal Bank of Canada ("RBC") and B2B Bank. The brochure stated, "*in partnership with the Royal Bank of Canada Insurance & the Ministry of Finance in BC, Customplan has put together a program to save clients up to 47% on their annual property tax bill.*" The logos of the provincial government, RBC, and B2B Bank, as well as the name of Customplan, were all used without authorization. Additionally, the licensee used the designation "MBA" in connection with his name and called himself a "Property Tax &

Investment Specialist” on his business cards. The licensee did not have an undergraduate degree, and his “MBA” was received from a two-month online course. Council also determined that the promoted strategy was not practical for clients. Although Council determined that a three year licence suspension was appropriate, it decided to decrease the suspension to two years, due to the licensee having been inactive for about a year prior to the decision. The licensee was also required to complete the Life Licence Qualification Program before the suspension would be lifted, and was required to be supervised for two years following the suspension. He was also assessed investigation costs.

42. [Michael Anthony Edwin Crowe](#) (September 2012) concerned a Life Agent who was found to have “*created and distributed misleading marketing materials that contain an unfair portrayal of a competitor’s insurance coverage intended primarily to reflect negatively on the competitor,*” and to have breached clients’ confidentiality by distributing marketing materials that contained their confidential information, without their approval. He also continued to distribute the marketing materials in question after being advised to stop by Council staff. The licensee was fined \$10,000 (\$2,000 of which was specifically intended by the Hearing Committee to be for the licensee’s “*use of incomplete information intended to mislead the public*”), and a condition was placed on his licence that prohibited him from using marketing materials in the solicitation of insurance unless specifically provided to him by the insurance company whose product he is soliciting. The licensee was also assessed investigation costs.
43. The precedents that involved website misrepresentations ([Apollo](#), [Ngo](#), [Persall](#), and [Crowe](#)) dealt with cases that were much more egregious than that of the case at hand, and therefore were of limited assistance to Council. Council considered the [Prestige](#) and [Tidsbury](#) cases to have some value in regard to the misuse of client information issue. [Assadi](#), the Licensee’s own prior disciplinary matter with Council, was also considered relevant and useful.

MITIGATING AND AGGRAVATING FACTORS

44. Council considered mitigating and aggravating factors. Mitigating factors included that the Licensee had co-operated with Council’s investigation, that clients were not harmed by the conduct at issue, and – most significantly – that the Agency website had been shut down very quickly when the Licensee and Licensee L had been made aware that it was publicly accessible.
45. The most significant aggravating factor, in Council’s opinion, is the Licensee’s history of similar conduct. He was disciplined by Council in September 2021 for client confidentiality issues similar to those investigated in the present case; he was also disciplined by the GICM in June 2023 for having failed to notify them of discipline by another regulator, and in turn failed to notify Council of the GICM’s discipline. Additional aggravating factors include that he was a Level 3 Agent with considerable experience at the time of the conduct in question, and that there is, in Council’s opinion, some likelihood that the Licensee may repeat the misconduct relating to client confidentiality and notification of regulators if disciplinary action is not taken.

46. Overall, Council determined that the aggravating factors outweighed the mitigating factors, and made the conduct at issue serious enough to warrant formal disciplinary action.

CONCLUSION

47. Council believes it is appropriate to fine the Licensee \$2,000 and require him to complete relevant courses (specifically, the Council Rules Course, Council's course for nominees, and a privacy course).
48. As noted above, the Licensee had been disciplined for similar conduct in the past. He was disciplined by Council in September 2021 for not treating confidential client information with adequate care. Although the two emails containing client information that the Licensee inappropriately sent to his personal email account from his work email account with the Former Employer were dated March 2021, therefore pre-dating Council's September 2021 order, Council believes it is significant that the underlying allegations that led to the 2021 order go back to 2019. In 2019, the Licensee became involved in a civil dispute initiated by a different former employer, which included allegations concerning his use of client information. That former employer also made a complaint to Council in 2019, which ultimately led to the September 2021 discipline. Given that the Licensee had been facing serious allegations about his handling of client information since 2019, Council thinks it is reasonable to have expected him to have been more careful with such information in 2021.
49. The Licensee was, similarly, disciplined by the GICM in June 2023 for having failed to inform them of Council's discipline. He then failed to notify Council of the GICM's discipline within the time frame required by Council Rule 7(3). Council did not accept the Licensee's explanation that he had been waiting for a payment acknowledgment letter from GICM to be a valid reason for not notifying Council in accordance with Rule 7(3).
50. Due to the repeated nature of these elements of the Licensee's misconduct, Council believes that a fine is warranted in order to minimize the chance of the Licensee committing the same breaches of the Council Rules and Code of Conduct again. The recommended courses are also intended to address the competency concerns identified with the Licensee and help avoid further incidents.
51. Council also intends to assess its investigation costs to the Licensee. As a self-funded regulatory body, Council looks to licensees who have engaged in misconduct to bear the costs of their disciplinary proceedings, so that those costs are not otherwise borne by British Columbia's licensees in general. Council has not identified any reason for not applying this principle in the circumstances.

INTENDED DECISION

52. Pursuant to sections 231 and 241.1 of the Act, Council made an intended decision that:
- a. The Licensee be fined \$2,000, to be paid within 90 days of Council's order;
 - b. The Licensee be required to complete the following courses, or equivalent courses as approved by Council, within 90 days of Council's order:
 - i. The Council Rules Course for General Insurance Agents, Salespersons and Adjusters;
 - ii. The Nominee Responsibilities and Best Practice course for General Insurance Agents and Adjusters; and
 - iii. The Privacy Compliance – How to Protect Your Brokerage, Part 1 and Part 2 courses, available through the Insurance Brokers Association of British Columbia

(collectively, "the Courses");
 - c. The Licensee be assessed Council's investigation costs of \$2,625, to be paid within 90 days of Council's order; and
 - d. A condition be imposed on the Licensee's general insurance licence that failure to complete the Courses and pay the fine and investigation costs by their deadlines will result in the automatic suspension of the Licensee's licence, and the Licensee will not be permitted to complete his 2027 annual licence renewal until such time as the Licensee has completed the Courses and paid the fine and investigation costs in full.
53. Subject to the Licensee's right to request a hearing before Council pursuant to section 237 of the Act, the intended decision will take effect after the expiry of the hearing period.

ADDITIONAL INFORMATION REGARDING FINES/COSTS

54. Council may take action or seek legal remedies against the Licensee to collect outstanding fines and/or costs, should these not be paid by the 90 day deadline.

RIGHT TO A HEARING

55. If the Licensee wishes to dispute Council's findings or its intended decision, the Licensee may have legal representation and present a case in a hearing before Council. Pursuant to section 237(3) of the Act, to require Council to hold a hearing, the Licensee **must give notice to Council by delivering to its office written notice of this intention within fourteen (14) days of receiving this intended decision**. A hearing will then be scheduled for a date within a reasonable period of time from receipt of the notice. Please direct written notice to the attention of the Executive Director. **If the Licensee does not request a hearing within 14 days of receiving this intended decision, the intended decision of Council will take effect.**
56. Even if this decision is accepted by the Licensee, pursuant to section 242(3) of the Act, the British Columbia Financial Services Authority ("BCFSA") still has a right of appeal to the Financial Services Tribunal ("FST"). The BCFSA has thirty (30) days to file a Notice of Appeal once Council's decision takes effect. For more information respecting appeals to the FST, please visit their website at <https://www.bcfst.ca> or visit the guide to appeals published on their website at <https://www.bcfst.ca/app/uploads/sites/832/2021/06/guidelines.pdf>.

Dated in Vancouver, British Columbia, on the **29th day of October, 2025.**

For the Insurance Council of British Columbia



Janet Sinclair
Executive Director