Dries du Toit Consulting
Independent Investment Consulting

Delta Private Wealth
a graviton partner

COMPLAINTS POLICY

Complaints Management Framework, Standards, Procedures & Complainant Communication

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Plan Statement

- Any reference to the "organisation" or the "FSP" shall be interpreted to include the "plan owner".
- The organisation's governing body, its employees, volunteers, contractors, suppliers and any other persons acting on behalf of the organisation are required to familiarise themselves with this policy's requirements and undertake to comply with the stated processes and procedures.

Plan Adoption

By signing this document, I authorise the organisation's approval and adoption of the processes and procedures outlined herein.

Name & Surname	Inus van Rooyen
Capacity	Chief Executive Officer / Key Individual
Signature	
Date	2026/10/02

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1. Definitions

1.1 Complaint

"Complaint" means an expression of dissatisfaction by a person to a provider or, to the knowledge of the provider, to the provider's service supplier, relating to a financial product or financial service provided or offered by that provider which indicates or alleges, regardless of whether such an expression of dissatisfaction is submitted together with or in relation to a client query, that —

- the provider or its service supplier has contravened or failed to comply with an agreement, a law, a rule, or a code of conduct which is binding on the provider or to which it subscribes;
- the provider or its service supplier's maladministration or wilful or negligent action or failure to act, has caused the person harm, prejudice, distress or substantial inconvenience; or
- the provider or its service supplier has treated the person unfairly.

1.2 Complainant

"Complainant" means a person who submits a complaint, and includes a —

- client;
- person nominated as the person in respect of whom a product supplier should meet financial product benefits, or that person's successor in title;
- person whose life is insured under a financial product that is an insurance policy;
- person that pays a premium or an investment amount in respect of a financial product;
- member;
- person whose dissatisfaction relates to the approach, solicitation, marketing or advertising material or an advertisement in respect of a financial product, financial service or related service of the provider,

who has a direct interest in the agreement, financial product or financial service to which the complaint relates, or a person acting on behalf of a person referred to above.

1.3 Client Query

"Client query" means a request to the provider or the provider's service supplier by or on behalf of a client, for information regarding the provider's financial products, financial services or related processes, or to carry out a transaction or action in relation to any such product or service.

1.4 Compensation Payment

"Compensation payment" means a payment, whether in monetary form or in the form of a benefit or service, by or on behalf of a provider to a complainant to compensate the complainant for a proven or estimated financial loss incurred as a result of the provider's contravention, non-compliance, action, failure to act, or unfair treatment forming the basis of the complaint, where the provider accepts liability for having caused the loss concerned, but excludes any —

- goodwill payment;
- payment contractually due to the complainant in terms of the financial product or financial service concerned; or
- refund of an amount paid by or on behalf of the complainant to the provider where such payment was not contractually due;

and includes any interest on late payment of any amount referred to above.

1.5 Goodwill Payment

"Goodwill payment" means a payment, whether in monetary form or in the form of a benefit or service, by or on behalf of a provider to a complainant as an expression of goodwill aimed at resolving a complaint, where the provider does not accept liability for any financial loss to the complainant as a result of the matter complained about.

1.6 Member

"Member" in relation to a complainant means a member of a —

- pension fund as defined in section 1(1) of the Pension Funds Act, 1956 (Act 52 of 1956);
- friendly society as defined in section 1(1) of the Friendly Societies Act, 1956 (Act 25 of 1956);
- medical scheme as defined in section 1(1) of the Medical Schemes Act, 1998 (Act 131 of 1998); or
- group scheme as contemplated in the Policyholder Protection Rules made under section 62 of the Long-term Insurance Act, 1998, and section 55 of the Short-term Insurance Act, 1998.

1.7 Rejected

"Rejected" in relation to a complaint means that a complaint has not been upheld and the provider regards the complaint as finalised after advising the complainant that it does not intend to take any further action to resolve the complaint, and includes complaints regarded by the provider as unjustified or invalid, or where the complainant does not accept or respond to the provider's proposals to resolve the complaint.

1.8 Reportable Complaint

"Reportable complaint" means any complaint other than a complaint that has been —

- upheld immediately by the person who initially received the complaint;
- upheld within the provider's ordinary processes for handling client queries in relation to the type of financial product or financial service complained about, provided that such process does not take more than five (5) business days from the date the complaint is received; or
- submitted to or brought to the attention of the provider in such a manner that the provider does not have a reasonable opportunity to record such details of the complaint as may be prescribed in relation to reportable complaints.

1.9 Upheld

"Upheld" means that a complaint has been finalised wholly or partially in favour of the complainant and that —

- the complainant has explicitly accepted that the matter is fully resolved; or
- it is reasonable for the provider to assume that the complainant has so accepted; and
- all undertakings made by the provider to resolve the complaint have been met, or the complainant has explicitly indicated its satisfaction with any arrangements to ensure such undertakings will be met by the provider within a time acceptable to the complainant.

1.10 Internal Complaints Review and Escalation Process

"Internal Complaints Review and Escalation Process" means the system and procedures established and maintained by the FSP in accordance with the General Code of Conduct for the resolution of reportable complaints lodged against the FSP by complainants.

1.11 Complaint Dispute Facilitator

"Complaint Dispute Facilitator" refers to an impartial, senior functionary within the provider, or who has been appointed by the provider, to manage the internal complaints escalation and review process.

2. Compliance Risk Area & Regulatory Framework

2.1 Compliance Risk Area

Complaints Management.

2.2 Regulatory Framework

This policy is issued and maintained in compliance with the following legislation, regulatory instruments and codes of conduct (collectively "the FAIS Act" framework):

- the Financial Advisory and Intermediary Services Act 37 of 2002 ("the FAIS Act");
- Board Notice 80 of 2003 — the General Code of Conduct for Authorised Financial Services Providers and Representatives, as amended ("the General Code of Conduct"), and in particular Part XI (sections 17 and 18) thereof;
- the Financial Sector Regulation Act 9 of 2017; and
- the Rules on Proceedings of the Office of the Ombud for Financial Services Providers, as amended and republished by the Ombud Council with effect from 1 July 2024.

2.3 Corresponding Documents

- this Complaints Policy;
- the Complaints Register & Analysis (Annexures A and B); and
- the Complainant Procedure Communication (Annexure C).

2.4 Responsible Person(s)

All persons responsible for managing reportable complaints lodged against the FSP, its key individual(s) and/or its representatives.

3. Purpose of the Complaints Policy

In terms of section 17(1)(a) of the General Code of Conduct, a provider must establish, maintain and operate an adequate and effective complaints management framework, in order to ensure the effective resolution of complaints and the fair treatment of complainants.

The complaints management framework must be based on outcomes that ensure it —

- is proportionate to the nature, scale and complexity of the provider's business and risks;
- is appropriate for the business model, policies, services, and clients of the provider;
- enables complaints to be considered after taking reasonable steps to gather and investigate all relevant and appropriate information and circumstances, with due regard to the fair treatment of complainants;
- does not impose unreasonable barriers to complainants; and
- addresses and provides for, at least, the matters contained in Part XI of the General Code of Conduct.

Section 17(1)(b) of the General Code of Conduct further requires that a provider must regularly review its complaints management framework and document any changes made to it.

In order to achieve the above outcomes, the organisation has adopted this Complaints Policy, which outlines the organisation's commitment towards the fair, transparent and effective resolution of complaints. The organisation will ensure that this Complaints Management Framework is regularly reviewed in order to ensure its continued effectiveness.

4. Establishing a Complaints Management Framework

The organisation is committed to rendering financial services with the proper due skill, care and diligence, and in the best interests of its clients.

Despite the organisation's high service standards, there may be instances where a client nevertheless prefers to submit a formal complaint against the organisation. In such instances, the organisation will follow the complaints management framework outlined below.

The FSP is committed to a transparent and accessible complaints resolution process that is fair to all parties involved. In order to achieve these outcomes, the FSP undertakes as follows:

4.1 Framework Features

The organisation's complaints management framework incorporates the following features, which the organisation is committed to enforcing at all times:

- relevant objectives, key principles and the proper allocation of responsibilities for dealing with complaints across the business of the organisation;
- appropriate performance standards and remuneration and reward strategies (internally and where any functions are outsourced) in order for complaints management to ensure objectivity and impartiality;
- documented procedures for the appropriate management and categorisation of complaints, including expected timeframes and the circumstances under which such timeframes may be extended;
- documented procedures which clearly define the escalation, decision-making, monitoring, oversight and review processes within the complaints management framework;
- appropriate complaint record keeping, monitoring and analysis of complaints, and reporting (regular and ad hoc) to executive management, the board of directors and any relevant committee of the board (or, in the absence of a board, the governing body) on —
  - identified risks, trends and action taken in response thereto; and
  - the effectiveness and outcomes of the complaints management framework;
- appropriate communication with complainants and persons representing complainants on complaints and the complaints processes and procedures;
- appropriate engagement between the organisation and the relevant Ombud;
- compliance with requirements for reporting to the Regulator and public reporting in accordance with Part XI of the General Code of Conduct; and
- a process for managing complaints relating to the organisation's representatives and service suppliers, insofar as such complaints relate to services provided in connection with the organisation's financial products, financial services or related services, which process will —
  - enable the organisation to reasonably satisfy itself that the representative or service supplier has adequate complaints management processes in place to ensure the fair treatment of complainants;
  - provide for the monitoring and analysis by the organisation of aggregated complaints data in relation to complaints received by its representatives and service suppliers and their outcomes;
  - include effective referral processes between the organisation and its representatives and service suppliers for handling and monitoring complaints submitted directly to either of them which require referral to the other for resolution; and
  - include processes to ensure that complainants are appropriately informed of the process being followed and the outcome of the complaint.

4.2 Ongoing Commitments

- the organisation will regularly monitor the complaints management framework;
- the organisation will resolve client complaints by means of a practical resolution process that is managed effectively;
- the organisation will train and empower all relevant staff members to facilitate and resolve complaints impartially;
- the organisation will deal with complaints in a timely and fair manner, with each complaint receiving proper due consideration;
- the organisation will take the necessary steps to investigate and respond promptly to a complainant;

- where deemed necessary, the organisation will appoint an independent mediator to resolve the complaint;
- where a complaint is resolved in favour of the complainant, the organisation will offer the appropriate level of redress to the complainant without delay;
- the organisation will maintain a record of all complaints for a period of five (5) years, together with an indication of whether or not the complaint has been resolved;
- the organisation will investigate, and where necessary, take appropriate action to avoid and prevent similar circumstances which gave rise to the complaint;
- the organisation will ensure the recording of complaints and complaints-related information in an accurate, efficient and secure manner, and will establish and maintain appropriate processes for reporting complaints-related information to its governing body; and
- the organisation is committed to ensuring that its complaints processes and procedures are transparent, visible, and accessible through channels appropriate to the organisation's clients.

5. Allocation of Responsibilities

- the board of directors of the organisation is responsible for effective complaints management. In the absence of a board of directors, the governing body and key individual of the organisation will be responsible;
- in accordance with section 17(3)(a) of the General Code of Conduct, the board of directors (or, in the absence of a board, the governing body) and the key individual(s) of the organisation, excluding a representative, will oversee and approve the effectiveness of the implementation of the organisation's complaints management framework; and
- the internal complaint review and escalation process may be delegated to the senior Complaint Dispute Facilitator, and any queries relating to that process must be directed to that person.

6. Responsible and Adequate Decision-Making

Any person in the organisation who is responsible for making decisions or recommendations in respect of complaints generally, or a specific complaint, must —

- be adequately trained;
- have an appropriate mix of experience, knowledge and skills in complaints handling, the fair treatment of customers, the subject matter of the complaints concerned, and relevant legal and regulatory matters;
- not be subject to a conflict of interest; and
- be adequately empowered to make impartial decisions or recommendations.

7. Categorisation of Complaints

When a reportable complaint is received, the Responsible Person must first categorise the complaint according to one (or more) of the following categories:

1	Complaints relating to the design of a financial product, financial service, or related service, including the fees, premiums or other charges related to that financial product or financial service.
2	Complaints relating to information provided to clients.
3	Complaints relating to advice.
4	Complaints relating to financial product or financial service performance.
5	Complaints relating to service to clients, including complaints relating to premium or investment contribution collection or lapsing of a financial product.
6	Complaints relating to financial product accessibility, changes, or switches, including complaints relating to redemptions of investments.

7	Complaints relating to complaints handling.
8	Complaints relating to insurance risk claims, including non-payment of claims.
9	Other complaints.

- The Responsible Person must categorise, record and report on reportable complaints by identifying the category, as set out in the table above, to which the complaint most closely relates, and group complaints accordingly; and
- The FSP may consider additional categories relevant to its financial products, financial services and/or client base, but only where doing so supports the effectiveness of the FSP's complaints management framework and improves the outcomes and processes for its clients.

8. Complaints Referral

- Where a representative receives a complaint which refers to an incident that has not occurred on the premises of that specific representative, but rather relates to another representative of the FSP, the first-mentioned representative must ensure that the complaint is referred to head office for the orderly resolution thereof;
- The referral of the complaint must occur within one (1) business day of receipt of the complaint, to ensure that the complainant receives feedback regarding the receipt of his/her complaint without delay; and
- It is preferable that such a complaint be referred to head office for prompt resolution, rather than forwarded to another representative.

9. Internal Complaint Escalation & Review Process

Through the adoption of this policy, the organisation establishes an appropriate internal complaints escalation and review process. The organisation is committed to ensuring that the procedures within this process are not overly complicated and do not impose unduly burdensome paperwork or other administrative requirements on complainants.

The internal complaint escalation and review process —

- follows a balanced approach, which bears in mind the legitimate interests of all parties involved, including the fair treatment of complainants;
- provides for the internal escalation of complex or unusual complaints at the request of the initial complaint handler;
- provides for complainants to escalate complaints not resolved to their satisfaction; and
- is allocated to the senior Complaint Dispute Facilitator, who is an impartial, senior functionary within the organisation appointed to manage the internal escalation and review process.

9.1 Internal Complaints Resolution Process

Where a complaint has been received, or where a complainant has indicated his/her/its intention to submit a formal complaint with the FSP, the following procedure must be followed:

- furnish the complainant with a copy of the Complainant Procedure Communication (Annexure C);
- where the complainant has previously communicated the grievance verbally, instruct the complainant to resubmit the complaint in writing;
- as soon as the complaint is received by the senior Responsible Person in writing, categorise the complaint according to the categories listed in section 7 of this policy;
- after categorisation, record the complaint in the Complaints Register & Analysis control document (Annexures A and B) within one (1) working day;
- inform the senior manager in charge of the relevant department for allocation to a trained and skilled person who is able to respond to the complaint (i.e. the Complaint Dispute Facilitator);

- review the FSP's professional indemnity cover policy wording and, where necessary, inform the relevant insurers of the complaint and potential claim;
- the Complaint Dispute Facilitator will investigate the complaint and review the file/transaction which gave rise to it;
- the Complaint Dispute Facilitator will discuss preliminary findings with all internal parties concerned;
- revert to the complainant with preliminary findings, and request supporting documents and/or additional information where necessary, within seven (7) working days — in all instances providing reasons for any decisions taken, and communicating any anticipated deviation from the timelines;
- where necessary, refer the matter to the relevant product supplier for a response, and duly inform the complainant of this development;
- the Complaint Dispute Facilitator will, in consultation with the management committee and the Compliance Officer, formulate a joint response to the complaint. Where deemed necessary, an independent mediator will be appointed;
- revert to the complainant with a proposed solution, with the option of escalating the matter to the Managing Director of the business, within fourteen (14) working days of receipt of the complaint — in all instances providing reasons for any decisions taken, and communicating any anticipated deviation from the specified timelines;
- the FSP's response may comprise —
  - any proposed settlement deemed appropriate;
  - a suggested remedy for the complaint;
  - rejection of the complaint, and reasons why;
  - an apology (if applicable) and any disciplinary action taken against the staff members involved; and
  - identified problems within the FSP and how they will be resolved;
- update the status of the Complaints Register & Analysis control document, and file all relevant correspondence for a period of five (5) years; and
- review the reasons that gave rise to the complaint and implement remedial actions to avoid and prevent similar complaints in future.

9.2 Escalation & Review Process

- Where the FSP has communicated a solution to the complainant and the complainant is not satisfied with its content, the complainant may refer the complaint to the Managing Director of the FSP. The Managing Director may amend the solution or confirm it;
- Where certain decisions must first be approved by the management committee of the FSP, this must be communicated to the complainant, along with confirmation of the date on which the decision relating to the complaint will be taken;
- Within six (6) weeks from the date of receipt of the complaint, and where the complaint has not been resolved to the satisfaction of the complainant, the complainant must be informed of his/her right to escalate the matter to the Ombud; and
- If, during the course of the enquiry, the Complaint Dispute Facilitator becomes aware that the complaint is of a non-routine, complex, unusual or serious nature, the following steps must be followed —
  - the supervisor will refer the matter to the FSP's Compliance Officer; and
  - the Compliance Officer will make a recommendation on how to proceed, which may include referral to the Ombud for adjudication, or referral for an opinion from an attorney (and, if so, the attorney's opinion must be sought);
- The reasons that gave rise to the complaint must be reviewed and, where necessary, remedial actions implemented to avoid and prevent similar complaints in future.

10. Decisions Relating to Complaints

10.1 Where a Complaint is Upheld

- Any commitment by the organisation to make a compensation payment or goodwill payment, or to take any other action, must at all times be carried out without undue delay and within the agreed timeframes; and
- Refer to section 1.9 of this policy for the complete definition of “upheld”.

10.2 Where a Complaint is Rejected

- The organisation will provide the complainant with clear and adequate reasons for the decision;
- The organisation will inform the complainant of its escalation or review process, including how to use these processes and any relevant time limits; and
- Refer to section 1.7 of this policy for the complete definition of “rejected”.

10.3 Ombud Availability

The organisation will clearly and transparently communicate the availability and contact details of the relevant Ombud to complainants at the start of the relationship, and in relevant periodic communications. The organisation will also display and make available information regarding the relevant Ombud at its premises and on its website.

11. Complaints Register and Analysis

In order to ensure that the FSP accurately, efficiently and securely records complaints and complaints-related information, the FSP must record information relating to its complaints management framework in the Complaints Register & Analysis (“the Complaints Register”) control document, attached as Annexures A and B.

It is important to note that completion of the Complaints Register only relates to **reportable complaints**, as defined in section 1.8 of this policy.

11.1 Sheet 1 — Complaint-Specific Data

The following specific data must be recorded in Sheet 1 of the Complaints Register (Annexure A), within one (1) working day of receipt of the reportable complaint:

- all relevant details of the complainant and the subject matter of the complaint;
- confirmation that copies of all relevant evidence, correspondence and decisions have been obtained;
- the complaint categorisation as set out in section 7 of this policy; and
- the progress and status of the complaint, including whether such progress is within or outside any timelines.

11.2 Sheet 2 — General Data

On Sheet 2 of the Complaints Register (Annexure B), the FSP must record and maintain the following general data on an ongoing basis in relation to reportable complaints, categorised in accordance with section 7 of this policy:

- number of complaints received;
- number of complaints upheld;
- number of rejected complaints, and reasons for the rejection;
- number of complaints escalated by complainants to the internal complaints escalation process;
- number of complaints referred to an Ombud, and their outcome;
- number and amounts of compensation payments made;
- number and amounts of goodwill payments made; and
- total number of complaints outstanding.

11.3 Analysis and Reporting

The information recorded in the Complaints Register will be analysed and scrutinised by the FSP on an ongoing basis, and will be utilised to manage conduct risks, effect improved outcomes and

processes for its clients, and prevent recurrences of poor outcomes and errors. The analysed information in the Complaints Register must be reported to the board of directors on a bi-annual basis.

12. Communication with Complainants

- as soon as the FSP receives a complaint, or an indication of a possible complaint, the FSP must provide the complainant with written acknowledgement of receipt of the complaint within one (1) business day; and
- the FSP must, within one (1) working day, provide the complainant with the Complainant Procedure Communication document (Annexure C), which addresses the complainant directly on behalf of the FSP and sets out the complaints management procedure in plain and understandable language.

13. Engagement with the Ombud & Reporting

- the organisation is committed to transparent engagement with any relevant Ombud in relation to its complaints;
- the organisation will monitor determinations, publications and guidance issued by any relevant Ombud, with a view to identifying failings or risks in the organisation's policies, services or practices;
- the organisation will maintain open and honest communication and co-operation between itself and any Ombud with which it deals;
- the organisation is committed to resolving a complaint before a final determination or ruling is made by an Ombud, or through the organisation's internal escalation process, without impeding or unduly delaying a complainant's access to an Ombud;
- the organisation will ensure that it has appropriate processes in place to comply with any prescribed requirements for reporting complaints-related information to any designated authority, or to the public, as may be required by the Regulator;
- where a complaint has been received, the FSP will clearly and transparently communicate the availability and contact details of the relevant Ombud services to the complainant — in the Complainant Procedure Communication document provided as soon as the complainant lodges a complaint, as well as in relevant periodic communications; and
- the contact details and/or availability of the Ombud must be displayed and/or made available at the premises of the FSP, as well as on the FSP's website.

14. Best Practice Principles

The organisation subscribes to the Treating Customers Fairly ("TCF") framework promoted by the Financial Sector Conduct Authority, and this Complaints Policy is designed and administered so as to give effect to the following six TCF outcomes:

- **Outcome 1 – Culture and governance:** clients can be confident that fair treatment is central to the organisation's culture, as reflected in the governance, oversight and decision-making responsibilities set out in sections 5 and 6 of this policy;
- **Outcome 2 – Products and services suited to client needs:** complaints trends identified through the Complaints Register (section 11) are analysed and fed back into the organisation's product and service design;
- **Outcome 3 – Clear information:** complainants receive clear, timely communication throughout the complaints process, including the plain-language Complainant Procedure Communication (Annexure C) and the notifications described in section 12;
- **Outcome 4 – Suitable advice:** complaints relating to advice are investigated with due regard to the fair treatment of complainants, as required by sections 3 and 6 of this policy;
- **Outcome 5 – Performance meets expectations:** the organisation deals with complaints in a timely and fair manner, with each complaint receiving proper due consideration, as set out in the timeframes and processes in sections 9 and 10; and
- **Outcome 6 – No unreasonable post-sale barriers:** the internal complaints escalation and review process does not impose unduly burdensome paperwork or other unreasonable barriers on complainants, and complainants are clearly informed of their right to escalate a complaint to the Ombud without impediment, as set out in sections 9, 10.3 and 13.

  The organisation will monitor its adherence to these outcomes as part of the ongoing review of this Complaints Management Framework referred to in section 4.2.

Annexure A: Complaints Register & Analysis

(In terms of section 18(b) of the FAIS Act and section 17(7)(a) & (b) of Part XI of the General Code of Conduct)

FSP Name	Dries du Toit Consulting (Pty) Ltd
FSP Number	3868
Responsible Person	

Date complaint received	Date of entry	Complainant	Complainant details	Received by	Short description	Category	Evidence obtained? (Y/N)	Progress — in/out of timeline	Outcome & date to client

Annexure B: Complaints Register & Analysis

General data relating to complaints (in terms of section 17(7)(c) of Part XI of the General Code of Conduct)

FSP Name	Dries du Toit Consulting (Pty) Ltd t/a Delta Private Wealth
FSP Number	3868
Data captured for the period	

Data input date	No. received	No. upheld	No. rejected	Reasons for rejection	No. escalated internally	No. referred to Ombud	Outcome of Ombud referral	Compensation / goodwill paid	Total outstanding

Annexure C: Complainant Procedure Communication

This document is provided to complainants directly and sets out, in plain and understandable language, the procedure the organisation will follow to resolve a complaint.

C.1 Purpose of this Document

The organisation is an authorised Financial Services Provider and, as such, has certain specific duties towards you — our valued client. One of these duties is the establishment of a formal complaint management and resolution framework, which enables you to exercise your rights as provided for in the Financial Advisory and Intermediary Services Act.

The purpose of this document is to inform you of the procedure that will be followed to provide a resolution for the complaint which you have submitted.

C.2 Complaint Must Be Relevant

In terms of the FAIS Act, a "complaint" means an expression of dissatisfaction by a person to a provider or, to the knowledge of the provider, to the provider's service supplier, relating to a financial product or financial service provided or offered by that provider which indicates or alleges, regardless of whether such an expression of dissatisfaction is submitted together with or in relation to a client query, that —

- the provider or its service supplier has contravened or failed to comply with an agreement, a law, a rule, or a code of conduct which is binding on the provider or to which it subscribes;
- the provider or its service supplier's maladministration or wilful or negligent action or failure to act, has caused the person harm, prejudice, distress or substantial inconvenience; or
- the provider or its service supplier has treated the person unfairly.

The financial services environment is complex. We will endeavour to address all reasonable requests from our clients but may also refer you to a more appropriate facility. Where the complaint relates to any aspect of our service, or any disclosures that ought to be made by us, we will endeavour to address those complaints in writing within seven (7) working days.

In instances where the complaint relates to any matter that is not within our control, such as product information or investment performance, we will forward the complaint to the product supplier concerned. Please note that we reserve the right to recover costs or damages that we may suffer as a result of clients making frivolous, vexatious or unreasonable claims.

C.3 Procedure

Our internal complaints resolution process is intended to provide for the fair and effective resolution of complaints. The time periods set out in this procedure will be adhered to as strictly as possible but may be varied if necessary. The following step-by-step guideline sets out the procedure we will adopt and demonstrates how a complaint will be dealt with, once received by us:

- your complaint, and all communications in connection with it, must be in writing. All verbal communications made in connection with the complaint must be confirmed in writing within three (3) working days of the communication;
- please indicate the following information —
  - your name, surname and contact details;
  - a complete description of your complaint and the date on which the financial service which led to your complaint was rendered;
  - the name of the person who furnished the financial advice or rendered the intermediary service that led to your complaint; and
  - how you would prefer to receive future communications regarding your complaint (e.g. via e-mail);
- Your complaint will be entered into our Complaints Register on the same day that it is made, and written confirmation of receipt will be forwarded to you. We will keep a record of the complaint and maintain such record for five (5) years, as required by legislation. Please note that the method of communication you choose will determine how quickly we can respond to your complaint;

- Your complaint will immediately be brought to the attention of the senior manager in charge of the relevant department, for allocation to a trained and skilled person who is able to properly respond to your complaint (i.e. the Complaint Dispute Facilitator);
- We will investigate the complaint and revert to you with our preliminary findings within seven (7) working days from the date of receipt of the complaint. In all instances, we will advise you of the reasons for our decisions;
- The preliminary findings will be discussed with all internal parties concerned, and a proposed solution will be communicated to you within a further seven (7) working days. In all instances, we will advise you of the reasons for our decisions;
- If you are not satisfied with our solution, you may refer the complaint to the Managing Director of our business. The Managing Director may amend the solution or confirm it. Please note that certain decisions may have to be approved by the management committee of the FSP; in such a case, we will communicate that fact to you, as well as the date on which a decision relating to your complaint will be taken;
- If, after referring the complaint to the Managing Director, you are still not satisfied with the outcome, we will regard the complaint as unsatisfactorily resolved. In such a case, you may approach the office of the Ombud for Financial Services Providers, or take such other steps as may be advised by your legal representatives;
- The Ombud is appointed by the Financial Sector Conduct Authority ("the FSCA") to act as an adjudicator in disputes between clients and financial services providers. Referral to the office of the Ombud must be done in accordance with section 27 of the Financial Advisory and Intermediary Services Act, 2002, and the rules promulgated under that section;
- In instances where we have not been able to reach a resolution within six (6) weeks after you have submitted your complaint, you may refer the matter to the Ombud. The Ombud acts independently and objectively, and has jurisdiction in respect of complaints relating to advice or intermediary services which arose after 15 November 2002;

You must, if you wish to refer the matter to the Ombud, do so within six (6) months from the date of the notice in which we inform you that we are unable to resolve your complaint to your satisfaction. The Ombud will not adjudicate matters exceeding a value of R3 500 000 (per the Ombud Council's Rules, effective 1 July 2024).

C.4 Contact Details of the FAIS Ombud

- **Physical Address:** Menlyn Central Office Building, 125 Dallas Avenue, Waterkloof Glen, Pretoria, 0010
- **Telephone:** +27 12 762 5000
- **Sharecall:** 086 066 3274
- **Postal Address:** P O Box 41, Menlyn Park, 0063
- **E-mail Address:** info@faisombud.co.za
- **Website:** www.faisombud.co.za
- **Office Hours:** Monday – Thursday 08h00 – 16h30; Friday 08h00 – 15h30

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Document Id: Ux2Bnyx6DOUFDk1a0f611fb6d_mOdaBQk2cpeVOj

Document 1 of 4

Document Name: Complaints Policy.pdf

Audit Trail

2026-10-02 08:31:59 SAST	Status marked as complete.	
2026-10-02 08:31:54 SAST	graham.flagg@ddtc.co.za (Graham Flagg) completed signing document	102.39.50.49
2026-10-02 08:31:38 SAST	graham.flagg@ddtc.co.za (Graham Flagg) accepted QuicklySign Terms and Conditions	102.39.50.49
2026-10-02 08:31:30 SAST	graham.flagg@ddtc.co.za (Graham Flagg) opened document	102.39.50.49
2026-10-02 08:31:30 SAST	graham.flagg@ddtc.co.za +27834297390 (Graham Flagg) entered correct pin	102.39.50.49
2026-10-02 08:31:23 SAST	Message delivered to +27834297390	
2026-10-02 08:31:10 SAST	OTP sent to: +27834297390 (Graham Flagg)	
2026-10-02 08:31:02 SAST	graham.flagg@ddtc.co.za (Graham Flagg) clicked document link	102.39.50.49
2026-10-02 08:31:00 SAST	graham.flagg@ddtc.co.za (Graham Flagg) clicked document link	104.47.51.254
2026-10-02 08:30:21 SAST	Email has been received by graham.flagg@ddtc.co.za mail server	149.72.251.1
2026-10-02 08:30:17 SAST	Signature request sent to: graham.flagg@ddtc.co.za (Graham Flagg)	
2026-10-02 08:30:11 SAST	inus@ddtc.co.za (Inus) completed signing document	197.88.232.123
2026-10-02 08:29:28 SAST	inus@ddtc.co.za (Inus) accepted QuicklySign Terms and Conditions	197.88.232.123
2026-10-02 08:29:24 SAST	inus@ddtc.co.za 0824441061 (Inus) opened document via authenticated session	197.88.232.123
2026-10-01 08:11:43 SAST	Email has been received by inus@ddtc.co.za mail server	149.72.149.168
2026-10-01 08:11:41 SAST	Signature request sent to: inus@ddtc.co.za (Inus)	
2026-10-01 08:11:35 SAST	Inus van Rooyen changed the status to:awaiting_signatures	102.39.50.49
2026-10-01 08:06:10 SAST	inus@ddtc.co.za (Inus van Rooyen) uploaded document	102.39.50.49

Signers

Inus

Email: inus@ddtc.co.za

Role: signer-1

Mobile Number: +27824441061

User Identification: trusted_authentication_email



Date completed: 2026-10-02 08:29:31 SAST

Graham Flagg
Email: graham.flagg@ddtc.co.za
Role: signer-2
Mobile Number: +27834297390
User Identification: email_mobile

Supporting documentation

Supporting documents that were uploaded, as part of the signing process, can be found on the document page online.

Online verification

This document can be verified online here

https://financial.quicklysign.com/verify_document/Ux2Bnyx6DOUFDk1a0f611fb6d_mOdaBQk2cpeVOj

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