

Complaints Policy

1. Complaints Policy
 2. Definition of Complaint
 3. Complaints Procedure
- Annexure A
Annexure B - Complaints process flow
Annexure C - Complaints register

1. Complaints Policy

We are committed to:

- Resolving client complaints in a manner which we believe is fair to our clients, our business and our staff.
- Ensuring that clients have full knowledge of the procedures established for internal resolution of their complaints, details of which will be given to them in writing.
- Ensuring easy access to our complaints resolution facilities at any of our offices, or by way of post, telephone or electronic help desk support.
- Employing and empowering properly trained people in our business to deal with complaints, as well as with the escalation of serious non-routine complaints.
- Dealing with complaints in a timely and fair manner, with each complaint receiving proper consideration in a process that is managed appropriately and effectively.
- Offering full and appropriate redress in all cases where a complaint is resolved in favour of a client – without delay.
- Informing clients of their right to refer their complaints to the FAIS Ombud should a complaint not be resolved to their satisfaction within four weeks from the date on which the complaint is received.
- Maintaining records of all complaints received for a period of 5 years, which will specify whether or not complaint were resolved
- Implementing follow-up procedures to:
 - Ensure the avoidance of occurrences giving rise to complaints and
 - Improve services and complaint systems and procedures where necessary

2. Definition of Complaint

Complaint means a specific complaint relating to a financial service rendered to the client on or after the date of commencement of FAIS, alleging that we:

- Contravened or failed to comply with a provision of FAIS and that, as a result, the client has suffered or is likely to suffer financial prejudice or damage;
- Willfully or negligently rendered a financial service to the client which has caused prejudice or damage to the client or which is likely to result in such prejudice or damage; or
- Treated the client unfairly.

3. Complaints Procedure

We deal with a complaint as follows:-

- 3.1 Log the date and contents of the complaint in the Complaints Register.
- 3.2 If a complaint is not in writing, ask the client to lodge the complaint in writing.
- 3.3 Acknowledge receipt of the complaint in writing within 5 days of receipt, and give the client the name(s) and contact details of the staff responsible for the resolution of the complaint.
- 3.4 Investigate the complaint to ascertain whether the complaint can be resolved immediately.
- 3.5 If the complaint can be resolved immediately, take the necessary action and advise the client accordingly.
- 3.6 If the complaint cannot be resolved immediately, send the client a written summary of the steps to be taken to resolve the matter and the expected date of resolution.
- 3.7 If unable to resolve the complaint within 4 weeks of logging the complaint in the Complaints Register, notify the client accordingly and advise the client of his / her right to:
 - Proceed in terms of Rule (6)a and 6(b) of the Rules on Proceedings of the Office of the Ombud for Financial Services Providers (see Annexure A); or
 - Seek legal redress in another forum.
- 3.8 Update the register with all developments/activities.

Annexure A

Rule 6(a) and 6(b) of the Rules on Proceedings of the Office of the Ombud for Financial Services Providers.

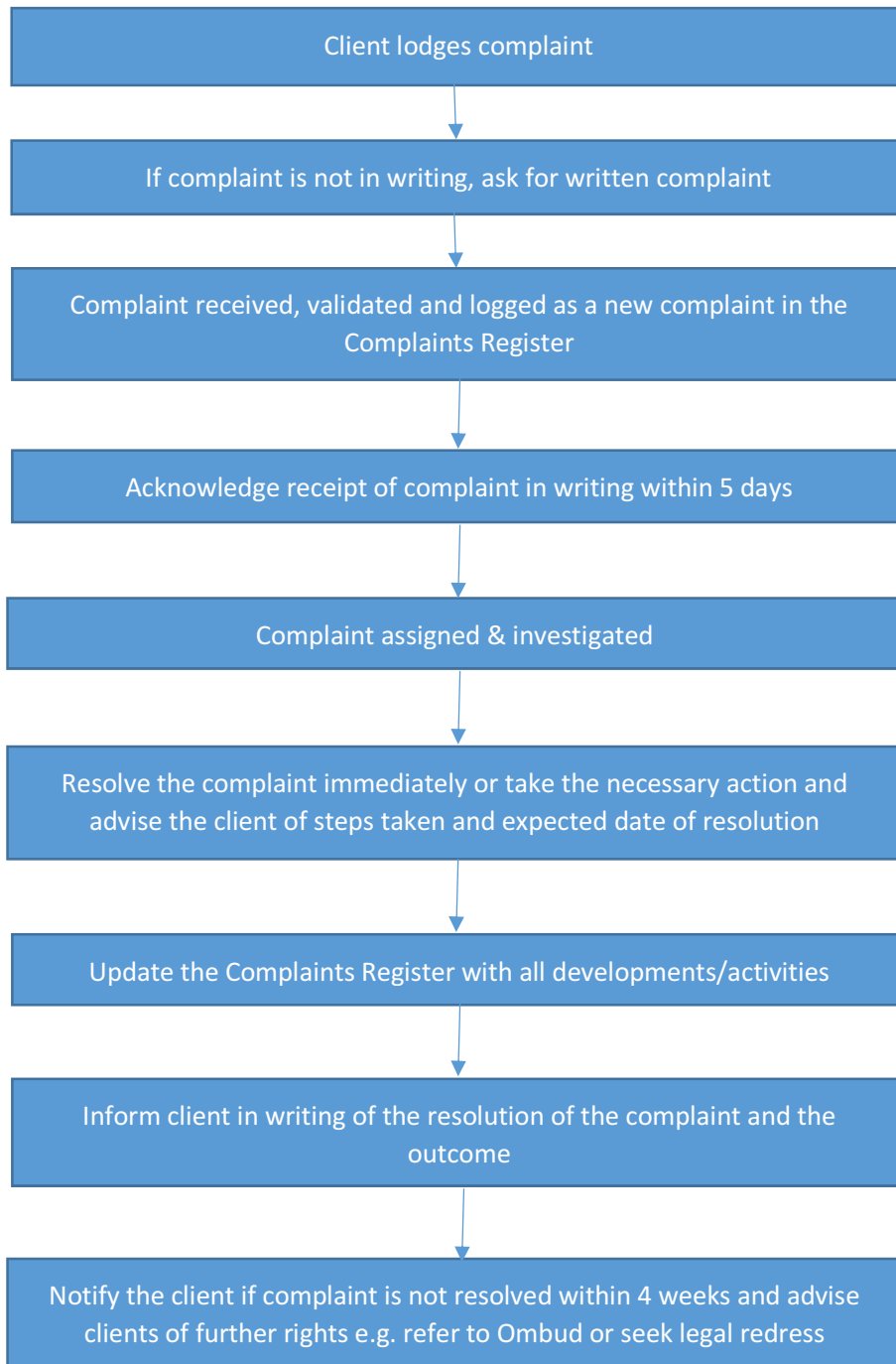
6 (a) Where a complaint cannot in a reasonable time be addressed by the responding party [provider], the responding party must as soon as reasonably possible send to the complainant a written acknowledgement of the complaint with contact references of the responding party.

6(b) If within four weeks of receipt of a complaint the responding party has been unable to resolve the complaint to the satisfaction of the client, the responding party must inform the complainant:

- (i) the complaint may be referred to the Office [of the Ombud for Financial Services Providers] if the complainant wished to pursue the matter; and
- (ii) the complainant should do so within six months of receipt of such notification

Annexure B

Complaints process Flow



Annexure C

Complaints Register.

The register must contain the following fields:

RECEIVED: This field will reflect the date on which the letter was received. The receipt period starts its calculations here

DATE CAPTURED: The date of the day on which the complaint is captured.

RECEIVED FROM: The name and designation for the person that submitted the complaint must be entered here, this may be a client or a client’s representatives.

PRODUCT: The product involved if any

COMPLAINT REFERENCE NUMBER: this field contains the client’s reference number linked to Policy No.

CLIENT SURNAME AND INITIALS: Enter the surname of the client making the complaint

COMPLAINT DESCRIPTION/TYPE: Short summary of the complaint.

CAPTURED BY: The name of the person who captured the complaint

RESPONSIBLE PERSON: Who will deal with the complaint and ensure that it is resolved.

ACTIVITY UPDATE: Log all developments and movements.

OUTCOME OF COMPLAINT: Summary of what decision was taken.

DATE OF FINAL COMMUNICATION TO CLIENT: Date of letter to the client

LESSONS: This is a field where any possible lessons learned from the handling of this complaint can be entered.

Received	Date Captured	Received from	Product	Client reference Number	Client Surname and Initial	Complaint Description	Captured By	Responsible Person	Activity Update	Outcome	Date Communicated to Client	Lessons

M1 Capital Investment (Pty) Ltd – COMPLAINT FORM

Complaint details:-

Surname	
Title	
First name(s)	
Occupation	
Identity number	
Postal address	
Telephone	
Fax	
E-mail	

Details of the person against whom you are complaining:-

Name of person or company	
Address	
Telephone	
Fax	

Investment number	
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