

COMPLAINTS POLICY

We are committed to the establishment and maintenance of a Complaints Policy in order to comply with the Financial Advisory and Intermediary Services Act (hereinafter referred to as FAIS Act) in the resolution of complaints.

In terms of the FAIS Act, a complaint is defined as follows:

“a specific complaint relating to a financial service rendered by a Financial Services Provider or Representative, to the complainant on or after the date of commencement of this Act, and in which complaint it is alleged that the Provider or Representative:

- a) has contravened or failed to comply with a provision of this Act and that as a result thereof, the complainant has suffered or is likely to suffer financial prejudice or damage;
- b) has wilfully or negligently rendered a financial service to the complainant which has caused prejudice or damage to the complainant or which is likely to result in such prejudice or damage; or
- c) has treated the complainant unfairly”

We confirm as follows:

1. The procedures to be taken in order to lodge any complaints will be made readily available to our clients;
2. We will attend to, and resolve any complaints timeously and fairly;
3. All relevant representatives will be trained with regard to the resolution of complaints in accordance with the relevant provisions of the FAIS Act and of this complaints policy;
4. Records of all complaints will be kept for a minimum period of 5 years;

5. When the outcome of a complaint is not in favour of the client, the client will be given written reason(s) and will be advised that the complaint may be pursued, within a 6 months period, with the Ombud whose contact details are provided herein.

We are committed to ensuring that instances which may give rise to complaints are avoided.

Complaints Procedure

If a client has any complaint which has caused or may cause prejudice or damage relating to a financial service rendered by one of our employed representatives or juristic representatives the client must be requested to immediately contact our Complaints Dispute Facilitator:

Maetheng Hlalele on telephone 011 431 1183 or by e-mail maetheng@associatedcompliance.co.za

Under no circumstance is the representative allowed or authorised to try to deal with the matter himself/herself.

The representative must ensure that the client is informed that complaints must be submitted in writing and contain all relevant information, including copies of all relevant documentation. All the client's contact details must be provided.

Our internal complaints resolution process is intended to provide fair and effective resolution of all complaints. The procedure for handling complaints is as follows: -

1. Our Complaints Dispute Facilitator will confirm receipt of the complaint and then appoint a supervisor who will be responsible to ensure that the complaint is properly dealt with in accordance with this policy.
2. Our Complaints Dispute Facilitator will confirm the name and contact details of the supervisor who will be handling the complaint;
3. The supervisor will make a full enquiry into the complaint by:
 - Calling for all necessary documentation from staff members involved in the matter;
 - Investigating the files;
 - Interviewing staff members involved.
4. Where necessary the supervisor will refer the matter to the product supplier for a response;
5. The supervisor may ask for additional information from the client, but if so this will be requested within 7 days of receiving the complaint. The investigation will commence on receipt of this further information;
6. The supervisor will draft a letter of response within 7 working days from the time the complaint or (if it was asked for) additional information is received.
7. If the complaint is of a routine nature, the supervisor will respond to the client in writing within 14 working days of the receipt of any additional information requested. If no additional information is requested, then a response will be submitted within 14 days of receipt of the initial complaint;
8. The response may deal with one or more of following issues:
 - Any proposed settlement if appropriate;
 - Suggested remedy for the complaint;
 - Dismissal of the complaint with reasons why;
 - Apology (if applicable) and the fact that disciplinary action may have been taken against the staff members involved;
9. The supervisor will identify why the complaint occurred and recommend procedural changes to eliminate recurrences.

If during the course of the enquiry, the supervisor becomes aware that the complaint is of a non-routine or serious nature, the following steps will apply:

1. The supervisor will refer the matter to our compliance officer;
2. Our compliance officer will make a recommendation as to how we should proceed with this complaint. His response may suggest that this matter be referred to the FAIS Ombud for FAIS for adjudication or that this matter be referred for an opinion from an attorney and if so, the attorney's opinion will be sought at our expense;
3. Based on the gravity of his/her findings, our Compliance Officer may recommend debarment of non-compliant Representatives;
4. Our Compliance Officer may recommend that we dismiss the complaint.

In dismissing a complaint, the client will be informed in writing of his/her rights in terms of the Financial Services Ombud Schemes Act, 2004 and appropriate contact details.

Whenever there is a complaint dealt with under this complaints policy and procedure, the Complaints Dispute Facilitator will make a record of the complaint and undertake to make appropriate internal changes or take such disciplinary action as is appropriate.

The time periods set-out in this complaints procedure will be adhered to as strictly as possible but may be varied if necessary.

In any case where a complaint is resolved in favour of the client, we will ensure that a full and appropriate redress is offered to the client without any delay.

This complaints procedure is intended to protect our clients. We reserve the right to recover costs or damages that we suffer as a result of clients making frivolous, vexatious or unreasonable claims

This complaints procedure can be added to, changed or cancelled by us at any time

CLIENT COMPLAINT FORM

Date of complaint

D	D	/	M	M	/	Y	Y	Y	Y
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REFERENCE NUMBER

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For office use

Complainants Full Names

Work Telephone

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Fax Telephone

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Cellphone Telephone

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E-mail Address

Physical Address

CODE _____

Details of Complaint

Don't forget to attach all supporting documentation

List of supporting documentation attached:

1	_____
2	_____
3	_____
4	_____
5	_____
6	_____

Complainants Signature

7	_____
8	_____
9	_____
10	_____
11	_____
12	_____

Complaint accepted by

Signature

Designation

Company

Directors:

JM VEAL(M.Inst.D), KS VEAL

Tel: 011 431 1183 Fax: 086 656 2947

An Authorised Financial Services Provider

FSP License No.: 39822

180 Smit St, Fairlands, JHB

CK Number 1992/006100/07