FINSMART ASSET MANAGEMENT (PTY) LTD

AUTHORISED FINANCIAL SERVICES PROVIDER FSP 44557

**FINSMART ASSET MANAGEMENT (PTY) LTD**

FSP 44557

# COMPLAINTS RESOLUTION POLICY

How We Handle Your Complaint

---

| | |
|---|---|
| **Version** | v4.0 — 2026 |
| **Effective Date** | 1 October 2026 |
| **Review Date** | 30 September 2027 |
| **Approved by** | Christel du Toit — Key Individual \| Jacques Horn — Key Individual |
| **Regulatory basis** | FAIS Act s.17 GCoC; COFI Act; TCF; POPIA; Board Notice 58 of 2020 |
| **Audience** | All Customers — available on our website and on request |

**Our Commitment to You**

We are committed to treating every customer fairly. If something has gone wrong, we want to hear about it — so we can put it right, quickly and fairly. This document explains exactly how to reach us, what we will do, and what your rights are if you are not satisfied with our response.

## 1. Your Rights as a Customer

Finsmart Asset Management (Pty) Ltd (FSP 44557) is an authorised Financial Services Provider regulated by the Financial Sector Conduct Authority (FSCA). As our customer, you have the right to:

- Receive fair, honest, and professional financial services at all times
- Have your complaint handled fairly, consistently, and without unnecessary delay
- Receive a written acknowledgement of your complaint within 48 hours of lodging it
- Receive a full written response to your complaint within 20 business days
- Escalate your complaint to our Key Individual if you are not satisfied with our response
- Refer your complaint to the FAIS Ombud at no cost to you, if it remains unresolved after our internal process
- Have your personal information treated with strict confidentiality under the Protection of Personal Information Act (POPIA)

**What is a Complaint?**

A complaint is any expression of dissatisfaction — written, verbal, WhatsApp, or electronic — about the way we have provided (or failed to provide) a financial service. It includes concerns about advice you received, fees charged, how your investment was managed, how you were treated, or delays in processing your instructions.

A simple question or request for information is not a complaint — but if at any point you feel dissatisfied, just let us know and we will treat it as one.

## 2. How to Lodge a Complaint

You can contact us in any of the following ways. We accept complaints through all channels — choose whichever is most convenient for you.

| Channel | Contact Details |
|---|---|
| Email (preferred) | christel@finsmart.co.za |
| WhatsApp / Phone | Confirm current number at finsmart.co.za |
| Written letter | 60 Mostert Road, Melkbosstrand, Cape Town 7441 |
| Online form | Submit via our website at finsmart.co.za (Complaints section) |
| In person | By appointment at our office — contact us to arrange |

When you contact us, please give us as much of the following information as possible — it helps us resolve your complaint quickly:

- Your full name and contact details (phone number and email address)
- Your account / policy / reference number (if you have one)
- A clear description of what happened and when it happened
- What outcome you are looking for (e.g. an explanation, a correction, or compensation)
- Any supporting documents, emails, or correspondence relevant to your complaint

⏱ **Important Deadlines to Know**

You have three (3) years from the date you became aware of the problem to lodge a complaint with us or with the FAIS Ombud.

## 3. Our Complaints Process — Step by Step

Once you have lodged your complaint, here is exactly what happens next:

**1** **We Acknowledge Your Complaint (within 48 hours)**
We will send you a written acknowledgement — by email or letter — confirming we have received your complaint. We will give you a unique complaint reference number and tell you who is handling your complaint.

**2** **We Investigate (within 20 business days)**
A dedicated staff member will investigate your complaint fairly and thoroughly. We will look at all relevant records, correspondence, and advice provided. If we need more time for a complex complaint, we will write to you explaining the reason for the delay and give you a revised timeframe.

**3** **We Send You Our Decision in Writing**
At the end of our investigation, we will send you a written response explaining: (a) our findings; (b) the outcome (upheld, partially upheld, or not upheld); and (c) any action we are taking to put things right — including any compensation or corrective action where applicable. If we are unable to uphold your complaint, we will clearly explain why and remind you of your right to escalate.

**4** **Escalation to Our Key Individual (optional)**
If you are not satisfied with the outcome, you may ask us to escalate your complaint to our Key Individual, Christel du Toit. She will conduct an independent internal review and respond to you within 10 business days of your escalation request.

**5** **External Referral — FAIS Ombud or FSCA**
If your complaint remains unresolved after our internal process, you have the right to refer it to the FAIS Ombud (or the National Financial Ombud, if applicable) at no cost to you. See Section 5 for contact details.

## 4. Timeframes at a Glance

| Stage | Timeframe | What Happens |
|---|---|---|
| Acknowledgement | Within 48 hours of receipt | Written confirmation + reference number issued to you |
| Investigation | Within 20 business days | Full investigation; extension notice sent if needed |

| | | |
|---|---|---|
| Written Decision | Within 20 business days (or extended period) | Outcome communicated in writing with reasons |
| Internal Escalation | Within 10 business days of escalation request | Key Individual reviews and responds |
| External Referral | Your choice — no deadline imposed by us | You may refer to FAIS Ombud at any time after internal process |
| Record Retention | 5 years from resolution date | All complaint records retained as required by law |

Note: "business days" means Monday to Friday, excluding South African public holidays.

## 5. Not Satisfied? External Options Available to You

If you are not satisfied with our final response, or if your complaint has not been resolved within the timeframes above, you have the right to refer the matter to the FAIS Ombud. This service is free of charge to you.

**FAIS Ombud — Free & Independent Complaint Resolution**

The FAIS Ombud investigates complaints against authorised financial services providers (FSPs) at no cost to you.

Telephone: 0800 110 443 (toll-free) | +27 12 762 5000
Email: info@faisombud.co.za
Website: www.faisombud.co.za
Address: Kasteel Park Office Park, Orange Building, 2nd Floor,
546 Jochemus Street, Erasmuskloof, Pretoria 0181
Postal: P.O. Box 74571, Lynwood Ridge, Pretoria 0040

Note: The National Financial Ombud Scheme (NFO), established under the Financial Sector Regulation Act, may in future consolidate multiple ombud functions. Until further notice from the FSCA, please direct FAIS-related complaints to the FAIS Ombud above. Check www.fsca.co.za for updates.

**Financial Sector Conduct Authority (FSCA)**

The FSCA is the market conduct regulator for all financial services in South Africa. You may also contact the FSCA directly if you believe we have breached our regulatory obligations.

Telephone: 0800 110 443 (toll-free)
Website: www.fsca.co.za

## 6. Our Regulatory Commitment — TCF and COFI

Finsmart operates in full compliance with the following frameworks that govern how we handle your complaint:

| Framework | What It Means for You |
|---|---|

| | |
|---|---|
| Treating Customers Fairly (TCF) — Outcomes 5 & 6 | Our products and services must work as we said they would. You must not face unreasonable barriers when making changes, switching, or accessing your money. |
| FAIS Act s.17 — General Code of Conduct | We are legally required to maintain a fair, transparent, and effective complaints process. |
| COFI Act (Conduct of Financial Institutions) | We must have a documented complaints management framework, give you meaningful access to our process, and report complaints data to the FSCA. |
| Board Notice 58 of 2020 | Sets the minimum standards for how complaints must be recorded, investigated, and reported. |
| POPIA (Act 4 of 2013) | Your personal information is protected. We only use your data to investigate and resolve your complaint. See Section 7 for full details. |

All complaints are recorded in our Complaints Register and reviewed quarterly by our Compliance Officer and Key Individual. Systemic issues (patterns of similar complaints) are escalated to our Board and reported to the FSCA as required.

## 7. Your Privacy — How We Use Your Information

We take your privacy seriously. Any personal information you provide when lodging a complaint will be used only to investigate and resolve your complaint.

| | |
|---|---|
| **What we collect** | Your name, contact details, account information, and details of your complaint |
| **Why we collect it** | To investigate your complaint fairly and contact you with our response |
| **Who sees it** | Only authorised Finsmart staff involved in investigating your complaint |
| **How we store it** | Securely in our encrypted digital complaints register; accessible only to authorised personnel |
| **How long we keep it** | 5 years from the date your complaint is resolved, as required by law |
| **Your rights** | You have the right to access, correct, or request deletion of your personal information (subject to legal retention requirements). Contact us at christel@finsmart.co.za |
| **Data breaches** | If your personal information is compromised during the complaints process, we will notify you and the Information Regulator (inforeg.org.za) promptly |

For our full Privacy Policy, please visit our website at finsmart.co.za or request a copy from us.

## 8. Types of Complaints We Handle

We accept and investigate all types of complaints relating to our financial services, including:

| Complaint Type | Examples |
|---|---|
| Advice-related | You believe the advice you received was inappropriate, unsuitable for your needs, or not properly explained |
| Fees and charges | You were charged incorrectly, fees were not disclosed, or you disagree with a fee amount |
| Product or investment performance | A product did not perform as you were led to expect or was misrepresented |
| Service and administration | Delays in processing instructions, errors on your account, or poor communication |
| Accessibility and switching | Difficulty accessing your money, unreasonable barriers to switching, or delays in transfers |
| Disclosure complaints | Information was not provided to you before you made a decision, or documents were incomplete |
| Conduct of our staff | You were treated disrespectfully, unprofessionally, or unfairly by a Finsmart representative |
| Data privacy (POPIA) | Your personal information was handled incorrectly, shared without consent, or lost/compromised |
| Other | Any other dissatisfaction with our products, services, or the way we handled a previous complaint |

## 9. Possible Outcomes of Your Complaint

After investigating your complaint, we will notify you of one of the following outcomes:

| Outcome | What It Means |
|---|---|
| Upheld | We agree that something went wrong. We will take corrective action and, where appropriate, offer compensation or a goodwill gesture. |
| Partially Upheld | We agree that some aspects of your complaint have merit. We will address the elements we accept and explain our position on the rest. |
| Not Upheld | After full investigation, we have not found evidence to support your complaint. We will explain our reasoning clearly and in full. You retain the right to escalate to the FAIS Ombud. |
| Resolved by Agreement | Your complaint is resolved to your satisfaction before a formal decision is made. |

If your complaint is upheld, any compensation or corrective action will be implemented promptly. You will receive written confirmation of the steps taken.

# Annexure A — Customer Complaint Form

You may use this form to lodge your complaint with us. Complete as much detail as possible and submit it via email to christel@finsmart.co.za, or hand deliver / post to 60 Mostert Road, Melkbosstrand, Cape Town 7441.

## Section 1 — Your Details

| Field | Your Information |
|---|---|
| Full Name | |
| ID / Passport Number | |
| Email Address | |
| Phone / WhatsApp Number | |
| Preferred Contact Method | ☐ Email ☐ Phone / WhatsApp ☐ Post |
| Finsmart Account / Reference Number | |
| Your Relationship with Finsmart | ☐ Current Customer ☐ Former Customer ☐ Authorised Representative |

## Section 2 — Complaint Details

| Field | Details |
|---|---|
| Date the issue occurred (or first became aware) | |
| Name of staff member / representative involved (if known) | |
| How did you receive the advice or service? | ☐ In person ☐ By phone ☐ By email ☐ Via website ☐ Other: _____ |
| Category of complaint (see Section 8 above) | ☐ Advice ☐ Fees ☐ Performance ☐ Service/Admin ☐ Switching ☐ Disclosure ☐ Staff conduct ☐ Data privacy ☐ Other |

## Section 3 — Description of Your Complaint

Please describe what happened, when it happened, and how it affected you. Attach any supporting documents, emails, or screenshots.

## Section 4 — What Outcome Are You Looking For?

| |
|---|
| Tell us what you would like us to do to resolve your complaint (e.g. an apology, a correction to your account, an explanation, compensation, or something else): |

## Section 5 — Declaration

| |
|---|
| I confirm that the information I have provided is accurate and complete to the best of my knowledge. I understand that my personal information will be used only to investigate and respond to my complaint in accordance with the Protection of Personal Information Act (POPIA) 4 of 2013. |

| Signature | Date |
|---|---|
| | |

**List of documents attached (optional):**

| # | Document Description |
|---|---|
| 1 | |
| 2 | |
| 3 | |

| | |
|---|---|
| **Prepared by** | Finsmart Compliance Division (FSP 44557) |
| **Approved by** | Christel du Toit — Key Individual \| Jacques Horn — Key Individual |
| **Effective Date** | 1 October 2026 |
| **Review Date** | 30 September 2027 |
| **Version** | v4.0 — 2026 |
| **Enquiries** | christel@finsmart.co.za \| 60 Mostert Road, Melkbosstrand, Cape Town 7441 |
| **Regulatory basis** | FAIS Act 37/2002 s.17 GCoC \| COFI Act \| TCF Outcomes 5 & 6 \| BN 58 of 2020 \| POPIA 4/2013 |

© 2026 Finsmart Asset Management (Pty) Ltd — All Rights Reserved. FSP 44557. This document is available on our website at finsmart.co.za and may be downloaded or printed free of charge.

www.finsmart.co.za
FSP 44557
60 Mostert Straat Melkbosstrand 7441
christel@finsmart.co.za