METHODICAL
INVESTMENT MANAGEMENT

Complaints Resolution Policy

Methodical Investment Managers (Pty) Ltd

FSP number: 44480

The Financial Advisory and Intermediary Services Act (FAIS Act) requires that a financial service provider must maintain an internal complaints resolution system and procedure to deal with client complaints.

This document details the procedure to be followed on receipt of a complaint.

What constitutes a complaint?

The General Code of Conduct provides the following definitions:

"**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 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 a person harm, prejudice, distress or substantial inconvenience; or
- The provider or its service supplier has treated the person unfairly.

"**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 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.

The General Code of Conduct also sets out the following categorisation, record keeping, monitoring and analysis requirements for reportable complaints:
Reportable complaints must be categorised as follows:-

- 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;
- Complaints relating to information provided to clients;
- Complaints relating to advice;
- Complaints relating to financial product or financial service performance;
- Complaints relating to a service to clients, including complaints relating to premium or investment contribution collection or lapsing of a financial product;
- Complaints relating to financial product accessibility, changes or switches, including complaints relating to redemptions of investments;

- Complaints relating to complaint handling;
- Complaints relating to insurance risk claims, including non-payment of claims; and

Other complaints
The following must be recorded in respect of a reportable complaint:

- All relevant details of the complainant and the subject matter of the complaint;
- Copies of all relevant evidence, correspondence and decisions;
- The complaint categorisation; and
- Progress and status of the complaint, including whether such progress is within or outside any set timelines.

A provider must maintain the following data in relation to reportable complaints categorised as above on an ongoing basis:

- 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

Complaints information must be scrutinised and analysed by a provider on an ongoing basis in order to manage conduct risks and effect improved outcomes and processes, and to prevent recurrences of poor outcomes and errors.

Who will deal with the complaint?

The Key Individual or an employee of Methodical who is skilled and empowered to deal with client complaints.

What happens once a complaint is made?

We deal with complaints as follows:

- Any verbal complaints must be reduced to writing, setting out the reasons for dissatisfaction and the desired outcome, and accompanied, if applicable, by any documentary evidence.
- Investigate the complaint to ascertain whether it can be resolved within 5 days or will require further investigation.
- If it can be resolved within 5 days of receipt, take the necessary action and advise the client accordingly. This will not be considered a reportable complaint and does not need to be recorded.
- If the complaint cannot be resolved within 5 days, acknowledge receipt of the complaint in writing, advise who will be handling the complaint and include a summary of the steps which will be taken in an attempt to resolve the matter and the expected turnaround times. This will be considered a reportable complaint.

- Log the reportable complaint in our Complaints Register and open a Complaints Tracker.
- Track the progress of the complaint resolution in the Complaints Tracker.

Complainants must be kept adequately informed of:

- The progress of their complaint
- Causes of any delay in the finalisation of their complaint and revised timelines
- The provider's decision in response to the complaint.
- Should the client be dissatisfied with the progress, they must be advised that they may escalate their concerns to the Key Individual in terms of the internal escalation process.

If unable to resolve the complaint to the client's satisfaction, notify the client, giving full written reasons as to why the outcome was not favourable and advise them of their right to:

- Refer the matter to the relevant Ombud;
- Refer the matter to the Pension Funds Adjudicator if appropriate;
- Seek legal advice from an attorney on what legal action may be taken; or
- Refer the matter to arbitration or mediation.

Where a complaint is upheld, any commitment by the provider to make a compensation payment, goodwill payment, or to take any other action will be carried out without any undue delay

Update the Complaints Register and Complaints Tracker with all the developments/activities

IMPORTANT CONTACT DETAILS

FAIS Ombud

Postal Address:	PO Box 74571 Lynwood Ridge 0040
Telephone:	068-066-3247
Email:	info@fasiombud.co.za
Website:	www.faisombud.co.za

National Financial Ombud

Postal Address:	110 Oxford Road Houghton Estate, Johannesburg 2198
Telephone:	086 080 0900
Email:	info@nfosa.co.za
Website:	www.nfosa.co.za