

QANTARA PRIVATE CAPITAL (PTY) LTD

COMPLAINTS MANAGEMENT FRAMEWORK

POLICY / PROCEDURE		
COMPLAINTS MANAGEMENT FRAMEWORK	Revision	Annually
	V1/2025	FAIS Act FAIS General Code of Conduct 80 of 2003
	Final Approver	Key Individual / Directors

Document Control

Creation Date:	2025
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Document History

Version	Date	Status	Amended by	Summary of Changes
Version 1/2025	07/2025	Draft	Ross Oosthuizen	Initial Drafting
Version 1/2025	07/2025	Draft	Ebrahim Moolla	Qantara Contributions
Version 1/2025	07/2025	Review	Neels Van Schalkwyk	Head of Legal
Version 1/2025	07/2025	Review	Orce Pesev	KI Revision

Management approval

Document Version	Name	Position	Signed	Date
Version 1/2025	Orce Pesev	Key Individual		
Version 1/2025	Ebrahim Moolla	Managing Director		

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1. PURPOSE

This Complaints Management Framework provides a structured and transparent approach for receiving, managing, and resolving complaints in accordance with the requirements of the Financial Advisory and Intermediary Services (FAIS Act and other applicable legislation).

It sets out the key principles and procedures that Qantara Private Capital (Pty) Ltd follows to ensure that complaints are addressed promptly, fairly, and consistently. An effective complaints process helps build client trust, supports service improvement, and reinforces a customer-focused culture within Qantara Private Capital (Pty) Ltd.

The framework also affects Qantara Private Capital (Pty) Ltd's commitment to Treating Customers Fairly (TCF) principles, particularly Outcome 6, which requires firms to remove unreasonable barriers that may prevent clients from lodging complaints or resolving issues post-sales.

2. OBJECTIVES

The Complaints Management Framework sets out the approach that Qantara Private Capital (Pty) Ltd is taking to manage complaints in order to mitigate business and client risks and to achieve compliance with the FAIS Act and subordinate legislation. The FSP is committed to ensure that appropriate measures are in place to enable the FSP to investigate and resolve any complaints received with due regard to the fair treatment of customers.

The Complaints Management Framework aims to assist our staff to apply a consistent, high-quality, fair, and accountable response to the management of complaints, queries, legal matters and Ombud Cases.

All complaints will be treated in line with the overall regulatory requirements and Treating Customer Fairly outcomes.

3. AVAILABILITY

This document is readily available to all employees and managers, and all stakeholders shall be appropriately and adequately informed of its provisions. Access to internal procedures, documentation and policies is available to external stakeholders on request.

4. KEY DEFINITIONS

The definitions relating to Complaints Management as defined in the FAIS General Code of Conduct as amended on 26 June 2020 are listed in **Annexure A**.

TERM	DEFINITION
Complaint	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.
Complainant	means a person who submits a complaint and includes a – a) client; b) person nominated as the person in respect of whom a product supplier should meet financial product benefits or that persons' successor in title; c) person whose life is insured under a financial product that is an insurance policy; d) person that pays a premium or an investment amount in respect of a financial product; e) member; f) 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 in (a) to (f);

TERM	DEFINITION
Client Query	A " 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. This can relate to information that is factual, daily servicing and.
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 – a) goodwill payment; b) payment contractually due to the complainant in terms of the financial product or financial service concerned; or c) 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 in (b) or (c);
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;
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 providers proposals to resolve the complaint;
Reportable complaint	"reportable complaint" means any complaint other than a complaint that has been – a) upheld immediately by the person who initially received the complaint;

TERM	DEFINITION
	b) 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 c) process does not take more than five business days from the date the complaint is received; or d) 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
Upheld	Means that a complaint has been finalised wholly or partially in favour of the complainant and that – a) 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 b) 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.

4.1 DEFINITION OF A COMPLAINT

By understanding the definition of a complaint and the definition of a client query, all Representatives and Employees engaging with clients will be able to determine the difference between a routine query versus a dissatisfied client who is complaining. One of the key differentiators is the measure of TCF Outcomes.

A "**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. This can relate to information that is factual, daily servicing and...

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.

The Complaints Register classifies complaints according to the 6 TCF Outcomes built into the Complaints Register. All Representatives and Employees are training on the TCF Practice and so will be capable of easily discerning whether a TCF Outcome is not being achieved, and that the client has been prejudiced or suffered some form of loss, and thus adding the complaint to the Complaints Register and initiating the Complaints Resolution Process.

Any complaint that comes through to the Complaints Mailbox will initially be classified as a complaint, given that the complaint was directed to such named mailbox. Upon further analysis and investigation, should the email communication be a client query and not a complaint, with the approval and consensus from the Complaints Manager, then the Complaints Register need not be updated.

5. COMPONENTS

The components of Qantara Private Capital (Pty) Ltd's Complaints Management Framework include:

Complaints Policy	The Complaints Policy documents the process that should be followed by Qantara Private Capital (Pty) Ltd and all relevant employees when it comes to working with clients and complaints.
Complaints Register	The Complaints Register is used to keep a record of and track complaints received by clients. The Complaints Register takes into consideration the 6 TCF Outcomes and links to the applicable Representative and/or Employee of Qantara Private Capital (Pty) Ltd that is servicing the client.
Complaints Mailbox	Qantara Private Capital (Pty) Ltd has a dedicated mailbox. The purpose of the mailbox is to create a direct avenue for clients, Advisers and staff to communicate any concerns or complaints. The dedicated mailbox is treated as high priority and specific employees are given access in order to monitor the queries and/or complaints being sent to the mailbox.

	customercare@qantaraprivatecapital.com
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6. REVIEW

Qantara Private Capital (Pty) Ltd undertakes to review its Complaints Management Framework and document the changes thereto on an annual basis, alternatively whenever there are changes in the business that have an impact on the Complaints Management Framework. A Review Register is set out in **Annexure B**.

Mike Hodgkiss is responsible for reviewing and updating the Complaints Management Framework.

7. PERFORMANCE STANDARDS

To ensure objectivity and impartiality, Qantara Private Capital (Pty) Ltd has the following performance standards and remuneration and reward strategies for complaints management (These are applicable internally and where any functions are outsourced):

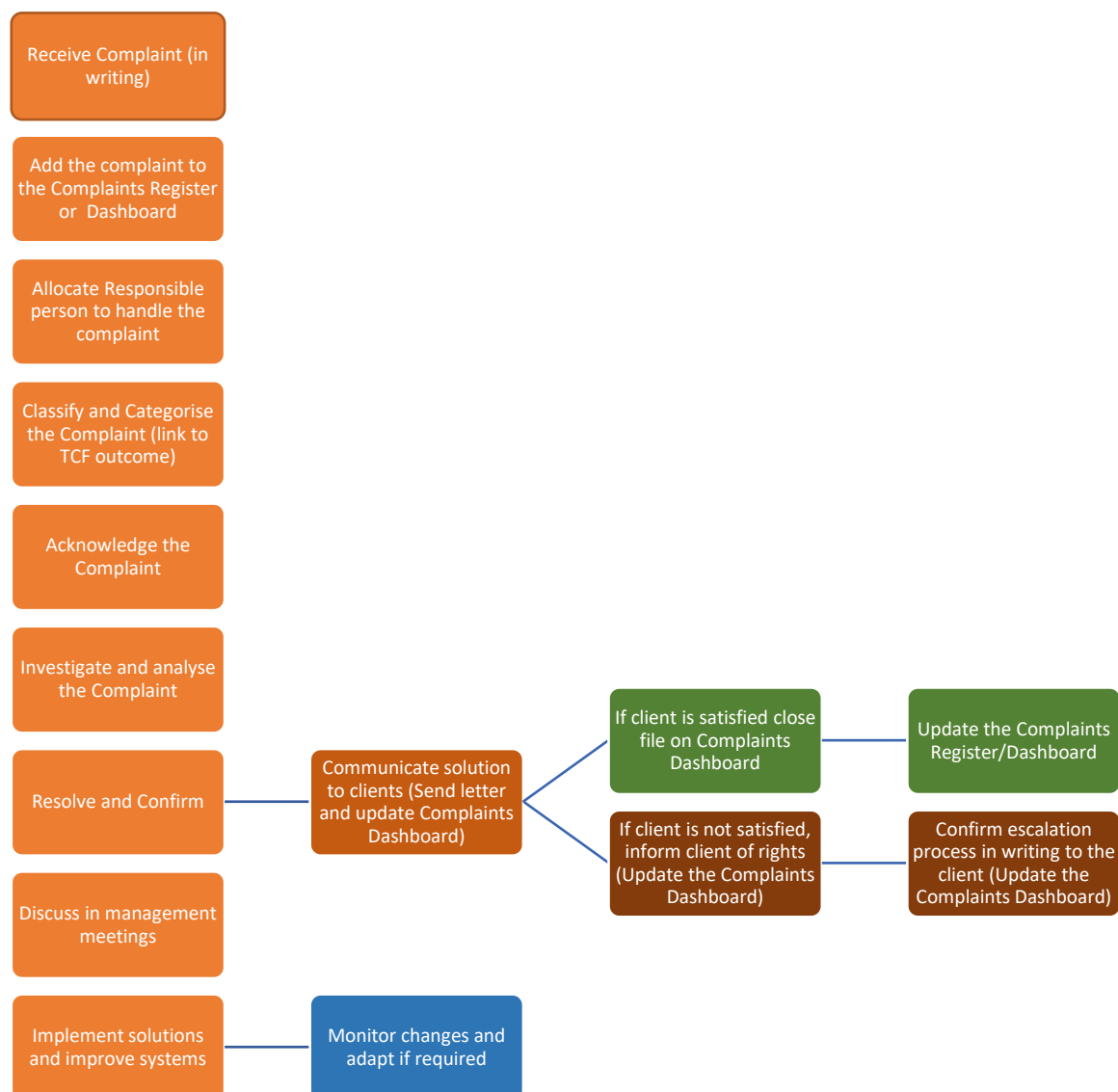
Acknowledgement of complaints	Acknowledge receipt of the complaint within 24-48 hours (or as per the organisational policy). Reduce the response time and ensure transparency in the process.
Complaint resolution time	Resolve the complaint within a defined time frame, typically 5 to 10 working days, depending on the complexity. Track the number of complaints resolved within the stipulated timeframe. Achieve a resolution rate of at least 90% within the designated period.
Clear communication	Maintain clear, concise, and professional communication with the complainant throughout the process. Monitor customer satisfaction with communication, including the clarity of responses and how well the issue is explained.
Fairness and impartiality	Handle complaints impartially and based on facts, ensuring no bias or unfair treatment. Regular reviews or audits of complaint resolution decisions to ensure fairness.
Root cause analysis	Investigate the root cause of complaints to address systemic issues and prevent recurrence. Use findings to implement corrective actions and improve service or processes.

Customer feedback on resolution	Collect feedback from complainants regarding their satisfaction with the resolution. Use feedback to continually improve the complaints handling process.
Escalation process	Clearly define an escalation process if the complaint is not resolved at the initial level. Ensure that 95% or more of escalated complaints are resolved effectively.
Confidentiality and data protection	Ensure that all complaints and related data are handled confidentially, adhering to privacy and data protection regulations.
Continuous improvement	Regularly review the complaints handling procedure and make improvements based on trends, feedback, and analysis.
Employee training	Ensure employees involved in handling complaints are adequately trained in conflict resolution, communication, and company policies.

By setting these performance standards, the Qantara Private Capital (Pty) Ltd can ensure that complaints are dealt with professionally, efficiently, and in a way that improves both customer satisfaction and operational processes.

8. COMPLAINTS PROCESS OVERVIEW

The diagram below is an example of an overview of the Complaints process with Qantara Private Capital (Pty) Ltd.



9. ALLOCATION OF RESPONSIBILITIES

9.1 COMPLAINTS MANAGEMENT

The board of directors or in the absence of a board, the governing body and key individuals of Qantara Private Capital (Pty) Ltd are/is responsible for the effective complaints management and must approve and oversee the effectiveness of the implementation of the business complaints

management framework. The following steps will be taken to communicate the complaints framework.

- The Board of Directors/Governing Body/Complaints Manager/Key Individual will ensure that all employees of the business have access to the Complaints Management Framework.
- The Board of Directors/Governing Body/Complaints Manager/Key Individual approves and oversees the effectiveness of the implementation of the Complaints Management Framework.

9.2 DECISION MAKING

Any person that 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, 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.

The Key Individual, Orce Peshev, has oversight over the complaints allocated to various personnel. Orce Peshev is also responsible for the effective management of complaints.

10. CATEGORISATION OF COMPLAINTS

10.1 PRESCRIBED MINIMUM CATEGORIES

At a minimum, the following categories will be used to categorise complaints:

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,
- Information provided to clients,
- Advice,
- Financial product or financial service performance,
- A service to clients, including complaints relating to premium or investment contribution collection or lapsing of a financial product;
- Financial product accessibility, changes or switches, including complaints relating to redemptions of investments,
- Complaints handling,
- Insurance risk claims, including non-payment of claims,
- Other complaints.

10.2 ADDITIONAL CATEGORIES

Qantara Private Capital (Pty) Ltd has identified the following additional categories of complaints that is relevant to the FSP's business model, financial products, financial services and client base.

TCF OUTCOME 1	
Includes complaints which:	Other complaints relating to management issues.
TCF OUTCOME 2	
Includes complaints which:	Relate to the design of a product or service.
	Relate to product features and charges that affect this TCF Outcome.
TCF OUTCOME 3	
Includes complaints which:	Relate to unsuitable or inaccurate, misleading, confusing, or unclear information provided to a client throughout the life cycle of a product.
	Qantara Private Capital (Pty) Ltd will include the include the Conflict-of-Interest disclosures required by the FAIS General Code of Conduct (GCOC); Section 4 and Section 5 of the GCOC or any other disclosure requirements in terms of the GCOC or any other legislation in these disclosures.
TCF OUTCOME 4	

Includes complaints which:	Relate to the advice given to a client by an Adviser which was misleading, inappropriate, and/or tainted with conflicts of interest which were not disclosed.
	Concern inappropriate advice given because of lack of knowledge, skill, or experience on the part of the Adviser of the product/service being rendered.
	Include the failure to conduct a Needs Analysis and to consider the clients' financial position, goals, or life stage.
TCF OUTCOME 5	
Includes complaints which:	Are about product performance and service-related issues.
	Relate to a client's disappointment with limitations in a product/service performance of which they were unaware.
	Relate to the inability of a product to meet a client's expectations.
	Relate to a Product Supplier's exercise of a right to terminate a product or amend its terms.
TCF OUTCOME 6	
Includes complaints which:	Relate to product accessibility, changes or switches.
	Relate to handling and complaints relating to claims.

Upon receiving a complaint Qantara Private Capital (Pty) Ltd (Pty) will ensure to categorise the complaint according to the following classification matrix the basis of which is an allocated risk level. The risk level will determine the prioritisation of the complaint. The following classification matrix is based on an allocated risk level. As mentioned, the risk level will determine the prioritisation of the complaint.

10.3 RISK RATED CATEGORIES

To ensure an effective and efficient response to complaints, Qantara Private Capital (Pty) Ltd has implemented a risk-based approach to classify and manage complaints. This categorisation enables the company to prioritise complaints based on their potential impact on the business, clients, and regulatory compliance. By assigning risk levels, the company can allocate resources appropriately, escalate serious matters in a timely manner, and ensure consistent and transparent compliant handling.

Each complaint is assessed and assigned a risk category-Risk 1 (low impact), Risk 2 (serious impact), or Risk 3 (official or regulatory complaints) – based on predefined criteria. This

structured approach enhances accountability and ensures that all complaints are handled in accordance with internal procedures and external regulatory requirements.

10.3.1 RISK 1

Complaints with low business impact probability i.e. routine complaints.

- Requires a response to the client within 15 working days.
- Have the potential of becoming serious or official complaints if disregarded or ignored by Qantara Private Capital (Pty) Ltd.
- Require staff to review the complaint and its priority with the /Key Individual (Orce Pesev) before proceeding to the next step.
- Requires the Key Individual (Orce Pesev) to decide on the appropriate person(s) to carry out subsequent steps, including the investigation.

10.3.2 RISK 2

Complaints which are urgent, and which can have a serious impact on the business i.e. serious complaints.

- Requires a response to the client within 7 - 10 working days.
- Are logged on media platforms, received from Legal Advisors or immediately evidence contravention of legislative requirements such as failure to conduct a proper Needs Analysis.
- Can cause reputational harm to a business and/or may cause financial loss to a client.
- Need to be handled by the Complaints Manager/Key Individual or a suitable senior person delegated to the task by the Complaints Manager/Key Individual. In this case, the function is allocated to the Key Individual, Orce Pesev.
- Complaints received from third parties and/or Legal Advisors will be responded to within 48 hours:
 - Acknowledging receipt of the complaint.
 - Further requesting authority to act on the complainant's behalf such as a power

of attorney or consent by the complainant to deal with the complaint on the complainant's behalf.

No information will be divulged to a third party who does not have the proper authority to act on a complainant's behalf.

10.3.3 RISK 3

Complaints which are received from authorities e.g. FAIS ombud i.e. urgent official complaints.

- Are handled by the Complaints Manager/Key Individual (Orce Pesev).
- Alternatively, the investigation of the complaint may be delegated to a suitable senior person selected by the Complaints Manager/Key Individual.
- The required draft response and attachments will be collated by such senior person.
- The Complaints Manager/Key Individual is responsible for compiling the response to the Authority.
- The response to the Authority will be made within the stipulated turnaround time stated on the official correspondence.

10.4 PROCEDURE

10.4.1 RECEIVING A COMPLAINT

A client is required to submit a complaint in writing to the contact details that appear in the FAIS Introduction and Disclosure Letter or the Complaints Management Framework. The complaint can be submitted by:

- Hand
- Post
- Email

Where a complaint is submitted telephonically, Qantara Private Capital (Pty) Ltd will send the client an email to request the relevant details regarding the complaint. The client needs to respond and provide the requested information in writing (e.g. hand, post, or email).

The client must submit sufficient detail of the complaint that includes the following:

- Name and surname of Complainant.
- Policy/Investment Number.
- Complainant ID Number.
- Postal Address.
- Financial Adviser.
- Product Supplier.
- Product Type (risk, investment, short-term, endowment, disability cover, unit trusts etc.)
- Complaint Category (i.e., product features and charges, information disclosures, advice, product performance, client services, access, changes or switches, complaints handling, claims, or other etc.).
- Brief details of the complaint.

10.4.2 ACKNOWLEDGEMENT OF A COMPLAINT

Upon receiving a complaint Qantara Private Capital (Pty) Ltd (Pty) will ensure the following:

- Acknowledgement of all complaints within 24 hours of receipt.
- Clearly and transparently communicate the availability and contact details of the relevant Ombud services to complainants (clients/investors) at all relevant stages of the relationship with a complainant, including at the start of the relationship and in relevant periodic communications.
- Ensure all communication with a complainant is in plain language.
- Provide, wherever feasible, complainants with a single point of contact for submitting complaints.
- Promptly inform a complainant of the process to be followed in handling the complaint, including-
 - Contact details of the person or department that will be handling the complaint;
 - Indicate and, where applicable, prescribed timelines for addressing the complaint;
 - Details of the internal complaints' escalation and review process if the complainant is not satisfied with the outcome of a complaint;

- Details of escalation of complaints to the office of a relevant Ombud and any applicable timeline; and
- Details of the duties of the provider and rights of the complainant as set out in the rules applicable to the relevant Ombud.
- Follow up telephonic acknowledgments with a written response either by SMS or email.
- Despatch a complaint reference number to the complainant on the acknowledgment of the complaint.
- Disclose to the client:
 - The type of information required from a complainant;
 - Where, how, and to whom a complaint and related information must be submitted;
 - Expected turnaround times concerning complaints; and
 - Any other relevant responsibilities of a complainant.
- Despatch the details of the person allocated to the complaint to the complainant within 48 hours from receipt.

10.4.3 ALLOCATION OF RESPONSIBLE PERSON

Upon receiving a complaint Qantara Private Capital (Pty) Ltd (Pty) will ensure the following:

- The complaint is allocated and dealt with by a trained staff member.
- The person responsible for the clients' complaint will furnish the client with his/her contact details and the reference number of the complaint.

The Key Individual has oversight over the complaints allocated to various personnel.

10.4.4 GROUPING COMPLAINTS

Qantara Private Capital (Pty) Ltd will follow the process below for the appropriate categorisation of complaints.

- Categorise, record, and report on reportable complaints by identifying the category to which a complaint closely relates and group complaints accordingly.

- Narrow down the categories to the impact on clients.
- Measure the impact of the complaint by further categorising it according to the following TCF Outcomes.

11. COMPLAINTS RESOLUTION PROCESS

Qantara Private Capital (Pty) Ltd will follow the steps below for all complaints received.

11.1 REPORTING A COMPLAINT

- Ensure the complaint process is accessible through channels that are appropriate to Qantara Private Capital (Pty) Ltd's clients.
- Ensure there are no charges for making use of the complaint process.
- Ensure communication is in plain language.
- Clearly explain the details of the findings and proposed resolution to the client - within the agreed timeframes.
- Where a complaint is upheld, if there has been any commitment by Qantara Private Capital (Pty) Ltd (Pty) Ltd to make a compensation payment, goodwill payment, or to take any other action ensure it is carried out without undue delay and within the agreed timeframes.
- Where a complaint is rejected, the complainant must be provided with clear and adequate reasons for the decision and must be informed of any applicable escalation or review processes, including how to use them and any relevant time limits.
- Send a written acknowledgment of the complaint to the complainant, with contact details of the FAIS Ombud, if the complaint cannot be addressed within three weeks and a single point of contact for submitting complaints.

11.2 COMMUNICATING COMPLAINTS

Upon receipt of a complaint, Qantara Private Capital (Pty) Ltd will take the following action:

- Ensure clients will be made aware of the Complaints Management Framework and will have access to the manual upon request.
- Update the Complaints Register.
- Ensure compliance with any prescribed requirements for reporting complaints

information to any relevant designated authority or the public as may be required by the Registrar.

- Close the matter.

11.3 ANALYSE THE COMPLAINT

Qantara Private Capital (Pty) Ltd will assign Mike Hodgkiss to analyse the complaint by following the below process.

- All complaints will be reviewed monthly and will be used as TCF Management Information to improve overall TCF outcomes.
- Action all complaints to prevent re-occurrence of poor outcomes and errors, where feasible.
- Ensure complaints are scrutinised and analysed on an ongoing basis
- Ensure complaints are utilised to manage conduct risks
- Ensure complaints effect improved outcomes and processes for its clients

Qantara Private Capital (Pty) Ltd will use meetings and other platform to discuss the complaints received. The frequency at which these discussions will take place is weekly or as and when a complaint or irate client requires an urgent matter to be addressed.

Qantara Private Capital (Pty) Ltd will use the approach below to implement the processes, monitoring plan and solutions identified during the [discussions/meetings] held. It will also implement any process change or updates that need to be applied to the Complaints Management Framework because of such meetings and/or discussions.

Once identified as a complaint, Qantara Private Capital (Pty) Ltd will use the Complaints Register to analyse the complaint in relation to linking it to the identified TCF outcome. The Complaints Register incorporates the 6 TCF Outcomes.

11.4 TIMELINES

The following timelines will apply to complaints that need to be addressed and resolved:

Action Required	Timeline
Acknowledgement of complaint	48 hours response to client
Complaints with low business impact probability i.e. routine complaints.	Response to the client within 15 working days.
Complaints which are urgent, and which can have a serious impact on the business i.e. serious complaints.	Response to the client within 5 - 10 working days
Complaints which are received from authorities e.g. FAIS ombud i.e. urgent official complaints.	As stipulated

12. COMPLAINTS RESOLUTION PROCESS

Upon receiving a complaint Qantara Private Capital (Pty) Ltd (Pty) will thereafter:

- Ensure that the proposed resolution meets the Treating Customers Fairly Outcomes, does not prejudice Qantara Private Capital (Pty) Ltd or complainant and does not involve any unnecessary legal or financial implications.
- Document and assess the proposed action agreed upon with the Complaints Manager and/or affected Key Individual and Representative.
- Discuss and review the signed off resolution with the complainant to ensure fairness and clarity and to further ensure that the resolution deals with the root cause of the complaint.
- Include recognition and documentation of any underlying issues that have contributed to the complaint and recommendations for actions to prevent the further occurrence in the review.

13. REPRESENTATIVES AND SUPPLIERS

At Qantara Private Capital (Pty) Ltd, we recognise that our relationship with suppliers plays a critical role in delivering exceptional financial products and services to our clients. As such, all suppliers providing financial products and services are required to maintain robust complaint management systems that align with our commitment to treating customers fairly (TCF).

14. DECISIONS RELATING TO COMPLAINTS

Qantara Private Capital (Pty) Ltd undertakes to ensure that:

- Where a complaint is upheld, any commitment by the FSP to make a compensation payment, goodwill payment or to take any other action will be carried out without undue delay and within any agreed timeframes.
- Where a complaint is rejected, the FSP will provide the complainant with clear and adequate reasons for the decision and inform the complainant of any applicable escalation or review processes, including how to use them and any relevant time limits.

15. COMPLAINTS ESCALATION AND REVIEW PROCESS

An FSP must establish and maintain an appropriate internal complaints escalation and review process. These procedures should not be overly complicated or impose unduly burdensome paperwork or other administrative requirements on complainants.

The FSP will use the following process for the escalation and review of complaints:

- Analyse the root cause of the complaint to enable the complaint to be appropriately dealt with and avoid, if possible, its re-occurrence.
- Identify and clarify internal and external key facts.
- Escalate complaints relating to product features or services handled solely by a Product Supplier.
- Whenever a complaint is escalated or reviewed ensure that:
 - A balanced approach is followed, bearing in mind the legitimate interests of all parties involved including the fair treatment of clients
 - Internal escalation of complex or unusual complaints at the instance of the initial complaint handler is provided for;
 - Clients may escalate complaints not resolved to their satisfaction the escalation is allocated to an impartial, senior functionary within the provider or appointed by the provider for managing the escalation or review process of the provider.

- Ensure that procedures within the complaints escalation and review process are not overly complicated or impose unduly burdensome paperwork or other administrative requirements on complainants.
- Document all areas of interaction and communication.
- Ensure accurate, efficient, and secure recording of complaints and complaints-related information.
- In respect of each reportable complaint, keep a record of:
 - All relevant details of the complainant and the subject matter of the complaint.
 - Copies of all relevant evidence, correspondence, and decisions.
 - The complaint categorisation.
 - The progress and status of the complaint, including whether such progress is within or outside any set timelines.

Where a complaint requires escalation or review, Mike Hodgkiss is responsible for managing the escalation and review process of complaints. Complaints may be escalated and/or reviewed in the following instances:

- Where the complaint is of a complex or unusual nature. In such an instance the initial complaint handler may escalate the complaint.
- Complainants may escalate complaints that were not resolved to their satisfaction (Complainants must be notified of this).

16. RECORD KEEPING, MONITORING AND ANALYSIS

Qantara Private Capital (Pty) Ltd will follow the process below for record keeping, monitoring and analysing of complaints.

16.1 RECORD KEEPING

The following must be recorded in respect of each 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,

- Progress and status of the complaint, including whether such progress is within or outside any set timelines.

Qantara Private Capital (Pty) Ltd will maintain the following data, on categorised reportable complaints, 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,
- Total number of complaints outstanding.

Records will be kept in an access-controlled folder on OneDrive.

16.2 MONITORING AND REPORTING

Qantara Private Capital (Pty) Ltd has established and maintains appropriate processes for reporting the information to its governing body or senior management. The monitoring and analysis of complaints will be reported to the Qantara Private Capital (Pty) Ltd's [governing body/senior management] on a [weekly/bi-weekly/monthly] basis. The report will include:

- Information on the categorisation of complaints
- What risks have been identified since the last report
- What trends have been identified
- What actions will be taken to manage risks and implement improved outcomes.

16.3 ANALYSIS

Complaints Information that has been recorded, must be scrutinised and analysed by the FSP on an ongoing basis. Qantara Private Capital (Pty) Ltd uses the above recorded information to

manage conduct risks and implement improved outcomes and processes for its clients, and to prevent recurrences of poor outcomes and errors.

Qantara Private Capital (Pty) Ltd will keep records of these reports, monitor changes and consider whether the Complaints Management Framework may need to be adapted in response to the findings and risks identified.

16.4 ENHANCEMENTS TO COMPLAINTS FRAMEWORK

Qantara Private Capital (Pty) Ltd will keep records of these reports, monitor changes and consider whether the Complaints Management Framework may need to be adapted in response to the findings.

16.5 RESPONSIBLE PERSON/S

TASK	RESPONSIBLE PERSON
Record Keeping	Orce Pesev
Monitoring	Orce Pesev
Analysis	Orce Pesev

17. COMMUNICATION WITH COMPLAINANTS

Qantara Private Capital (Pty) Ltd will ensure that:

- Its complaint processes and procedures are transparent, visible and accessible through channels that are appropriate to the provider's clients.
- It does not impose any charge for a complainant to make use of complaint processes and procedures.
- All communications with a complainant will be in plain language.
- Wherever feasible, it will provide clients with a single point of contact for submitting complaints.
- The following information is disclosed to a client:
 - The type of Information required from a complainant

- Where, how and to whom a complaint and related information must be submitted
 - Expected turnaround times in relation to complaints
 - Any other relevant responsibilities of a complainant
- Within a reasonable time after receipt of a complaint, it will acknowledge receipt thereof and promptly inform a complainant of the process to be followed in handling the complaint including:
 - Contact details of the person or department that will be handling the complaint
 - Indicative and, where applicable, prescribed timelines for addressing the complaint
 - Details of the internal complaints' escalation and review process if the complainant is not satisfied with the outcome of a complaint
 - Details of escalation of complaints to the office of a relevant ombud and any applicable timeline
 - Details of the duties of the provider and rights of the complainant as set out in the rules applicable to the relevant ombud.
- Complainants will be kept adequately informed of:
 - The progress of their complaint
 - Causes of any delay in the finalisation of a complaint and revised timelines, and
 - The FSP's decision in response to the complaint.
 - Any additional measures that Qantara Private Capital (Pty) Ltd will follow to communicate effectively with a complainant.
 - Obtain consent from the complainant to ensure that no personal information is divulged or processed without the complainant's knowledge or consent.
 - Keep the complainant appropriately updated on the progress of the investigation.

18. ENGAGEMENT WITH OMBUD AND REPORTING

At Qantara Private Capital (Pty) Ltd, we are committed to ensuring that all complaints are resolved fairly and efficiently. If a complaint cannot be resolved within our internal processes or through direct engagement with the relevant parties, we recognize the right of the customer to

escalate the matter to an Ombudsman or relevant regulatory authority. We have established a clear and structured process for communicating and engaging with Ombuds to ensure that complaints are addressed impartially and under applicable regulations.

As such, Qantara Private Capital (Pty) Ltd will ensure there is an appropriate process in place for engagement with any relevant Ombud concerning its complaints. We will clearly and transparently communicate the availability and contact details of the relevant ombud services to complainants at all relevant stages of the relationship with a client, including at the start of the relationship and in relevant periodic communications.

We will display and/or make available information regarding the availability and contact details of the relevant Ombud services, at the premises and/or on the company website and maintain specific records and carry out specific analysis of complaints referred to your business by the Ombud and the outcomes of such complaints.

We will monitor determinations, publications, and guidance issued by any relevant Ombud to identify failings or risks in their policies, services, or practices and maintain open and honest communication and co-operation between itself and any Ombud with whom it deals.

We will endeavour to resolve a complaint before a final determination or ruling is made by an Ombud, or through the business' internal escalation process, without impeding or unduly delaying a complainant's access to an Ombud.

ANNEXURE A – DEFINITIONS

"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;

"complainant" means a person who submits a complaint and includes a –

- g) client;
- h) person nominated as the person in respect of whom a product supplier should meet financial product benefits or that person's successor in title;
- i) person whose life is insured under a financial product that is an insurance policy;
- j) person that pays a premium or an investment amount in respect of a financial product;
- k) member;
- l) 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 in (a) to (f);

"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 -

- a) 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;
- b) 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
- c) the provider or its service supplier's has treated the person unfairly;

"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 –

- a) goodwill payment;
- b) payment contractually due to the complainant in terms of the financial product or financial service concerned; or
- c) 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 in (b) or (c);

"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;

"member" in relation to a complainant means a member of a -

- a) pension fund as defined in section 1(1) of the Pension Funds Act, 1956 (Act 52 of 1956);
- b) friendly society as defined in section 1(1) of the Friendly Societies Act, 1956 (Act 25 of 1956);
- c) medical scheme as defined in section 1(1) of the Medical Schemes Act, 1998 (Act 131 of 1998); or
- d) 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;

"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 providers proposals to resolve the complaint;

"reportable complaint" means any complaint other than a complaint that has been -

- a) upheld immediately by the person who initially received the complaint;
- b) 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
- c) 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;

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

- a) the complainant has explicitly accepted that the matter is fully resolved; or
- b) it is reasonable for the provider to assume that the complainant has so accepted; and
- c) 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.

ANNEXURE B – REVIEW REGISTER

DATE OF REVIEW	REVIEWED BY	CHANGES ACTIONED	NEXT REVIEW DATE	BOARD APPROVAL

ANNEXURE C – ACKNOWLEDGEMENT LETTER

Explanatory note:

The General Code of Conduct requires that an FSP must promptly acknowledge receipt of a complaint in writing with particulars of the staff involved in the resolution of the complaint.

This template letter should be pasted onto a letterhead with full details of the FSP. Keep a record or proof that the letter has been sent. The style and format may be changed according to the FSP's own style and individual requirements.

Dear Mr / Mrs **[Name of Customer]**

We acknowledge receipt of your written complaint, received by us on **[date]**.

We will investigate the matter and attempt to resolve the complaint within a period of **[timeframe]**. If we are unable to resolve the complaint within this time, we will notify you of the reasons for the delay.

The staff member who will be dealing with your complaint is **[staff member's name]**. **[He/She]** may be contacted at the details that appear above.

While we regret that you have cause for concern regarding our financial services rendered, be assured that we will investigate and attempt to resolve your complaint in a timely and fair manner.

Thank you for bringing this to our attention, and for your patience while we investigate this matter.

A copy of our Complaints Resolution Manual is available from our offices, upon request.

Yours faithfully

Qantara Private Capital (Pty) Ltd

ANNEXURE D – LETTER WHERE OUTCOME IS NOT IN FAVOUR OF CUSTOMER

Explanatory note:

The General Code of Conduct requires that where the complaint cannot be resolved in favour of the customer, the customer must be informed in writing of the full reasons for not resolving the complaint. The customer must be informed that he/she may refer the matter to the FAIS Ombud within 6 months of this notification. This template letter may be used for this purpose and should be pasted onto a letterhead with the date. Insert full details of the reasons why the complaint could not be settled as this letter will be considered by the Ombud if the matter is referred to him.

Dear Mr / Mrs **[Name of Customer]**

We refer to your written complaint that was received by us on **[date]**.

Thank you for your patience whilst we conducted a thorough investigation into the matter.

We unfortunately regret to advise that we were unable to resolve the complaint in your favour. Our decision is based on the following reason(s):

- 1.
- 2.
- 3.

Should you wish to pursue the matter further with us, the details of our internal complaints escalation and review process is as follows **[include the relevant timeframes and staff member to contact]**:

.....
.....

Alternatively, should you wish to pursue the matter further; you may refer the complaint to the FAIS Ombud. This should be done within six months of receipt of this letter.

The office of the FAIS Ombud may be contacted at:

Postal Address

P.O. Box 74571

Lynwood Ridge

0040

Telephone 012 762 5000 / 0860 663 247

E-mail info@faisombud.co.za

Website www.faisombud.co.za

Further steps available to you include seeking legal advice from an Attorney or you may refer the matter to arbitration.

Yours faithfully

Qantara Private Capital (Pty) Ltd

ANNEXURE E – LETTER WHERE OUTCOME IS IN FAVOUR OF CUSTOMER

Explanatory note:

The General Code of Conduct requires that where the complaint is resolved in favour of the customer, the FSP must ensure that a full and appropriate redress is offered to the customer without any further delay. This template letter may be used for this purpose and should be pasted onto a letterhead with the date. Insert full details of the settlement offer including the amount payable, whether any costs will be covered and the manner in which the amount will be settled. It is suggested that if the offer is acceptable to the customer, he or she acknowledges in writing that the complaint has been resolved to his or her satisfaction.

Dear Mr / Mrs **[Name of Customer]**

We refer to your written complaint which was received by us on [date].

Thank you for your patience whilst we conducted a thorough investigation into the matter.

It gives us pleasure to advise that the complaint has been resolved in your favour. The decision is based on the following reasons:

- 1.
- 2.
- 3.

We would like to offer you the following redress:

- 1.
- 2.
- 3.

Kindly advise whether this is acceptable to you, so that we can confirm our agreement in writing. Once again, our sincere apologies for the cause which led to this complaint. We hope that we can still be of service to you in the future.

Yours faithfully

Qantara Private Capital (Pty) Ltd

ANNEXURE F – IMPORTANT CONTACT DETAILS

THE FAIS OMBUD

Postal Address

P.O. Box 41
Menlyn Park
0063

Telephone 012 762 5000 / 086 066 3274

E-mail info@faisombud.co.za

Website www.faisombud.co.za

THE PENSION FUNDS ADJUDICATOR

Postal Address

P.O. Box 580
Menlyn
0063

Telephone 012 346 1738 / 012 748 4000

E-mail enquiries@pfa.org.za

Website www.pfa.org.za

THE NATIONAL FINANCIAL OMBUD (NFO)

The National Financial Ombud Scheme South Africa (NFO Scheme) was recognized by the Ombud Council on March 1, 2024, as an industry ombud scheme in terms of Section 194 of the Financial Sector Regulation Act, 2017 (Act No. 9 of 2017) (FSR Act) and deals with complaints related to Credit, Banking Services, Long-term Insurance and Short-term Insurance complaints.

JOHANNESBURG

Postal Address

110 Oxford Road
Houghton Estate
Johannesburg
Gauteng

2198

Telephone 0860 800 900
E-mail info@nfosa.co.za
Website www.nfosa.co.za

CAPE TOWN

Postal Address

6th Floor Claremont Central Building
6 Vineyard Road
Claremont
Cape Town
7700

Telephone 0860 800 900
WhatsApp 066 473 0157
E-mail info@nfosa.co.za
Website www.nfosa.co.za