

**FINANCIAL ADVISORY AND INTERMEDIARY SERVICES ACT, NO. 37 OF 2002  
("FAIS ACT")**

**COMPLAINTS POLICY AND PROCEDURES**

**FSP Name: Multilect Administrators (Pty) Ltd ("FSP")**  
**FSP No.: 45364**  
**Section 13B: 24/79**  
**Date: 1 March 2019**

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### 1. INTRODUCTION

This document constitutes the complaints policy and internal complaint resolution system and procedures of the FSP as required by the FAIS Act.

### 2. COMPLAINTS POLICY

The FSP is committed to an internal complaint resolution system and procedures based on the following principles:

- 2.1 to maintain and remain committed to an efficient internal complaint resolution system with adequate resources;
- 2.2 transparency and visibility by ensuring that clients have full knowledge of the procedures for resolution of their complaints;
- 2.3 accessibility of facilities by ensuring the existence of easy access to such procedures at any of the FSP's business premises open to clients, and through ancillary postal, fax, telephone and/or electronic means;
- 2.4 fairness by ensuring that resolution of a complaint will be effected in a manner which is fair to both clients, the FSP and staff; and
- 2.5 adequate training of all relevant staff including imparting and ensuring full knowledge of the provisions of the legislation with regard to the resolution of complaints.

### 3. DEFINITION OF COMPLAINT

“Complaint” means a specific complaint relating to a financial service rendered by the FSP or a representative to the complainant on or after the date of commencement of the FAIS Act and in which complaint it is alleged that the FSP or representative:

- 3.1 has contravened or failed to comply with a provision of the FAIS Act and that as a result thereof the complainant has suffered or is likely to suffer financial prejudice or damage;
- 3.2 has willfully 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

3.3 has treated the complainant unfairly.

#### 4. PROCEDURE FOR LODGING A COMPLAINT

4.1 Any client who wishes to lodge a complaint against the FSP or any employee must lodge such complaint in writing.

4.2 The complaint must provide full details and be accompanied by supporting documentation.

4.3 All complaints must be addressed to:

FSP name: Multilect Administrators (Pty) Ltd  
Postal address: PO Box 3029 Saxonwold 2132  
fax no: +27(0)11 486 4607  
E-mail address: lorraineh@multilect.co.za  
For the attention of: Lorraine Hilton

4.4 The FSP will acknowledge receipt of the complaint in writing.

4.5 The FSP will respond promptly to any complaint.

4.6 The FSP will notify the complainant in writing of the outcome of the resolution of the complaint within 6 weeks of receipt thereof.

4.7 Should the complaint not be resolved to the complainant's satisfaction within 6 weeks of lodging such complaint, the complainant may lodge the complaint with the Ombud of Financial Services Providers within 6 months of receiving notification from the FSP regarding the resolution/dismissal of the complaint.

4.8 Should the complainant not lodge the complaint with the Ombud, the complainant may pursue any other avenue of law which is available to it.

4.9 Contact details of the Ombud:

name: Naresh Toresh Tulsie  
postal address: P.O. Box 74571  
Linwood Ridge  
0040  
tel no: 012-470-9080/99  
fax: 012-348-3447

#### 5. INTERNAL COMPLAINT RESOLUTION SYSTEM

5.1 The FSP must nominate a contact person responsible for managing and overseeing the effective resolution of complaints and compliance with this complaints policy and procedures ("the contact person").

- 5.2 All clients must be advised in writing that the FSP has a complaints policy and procedures which communication must contain the FSP's contact details.
- 5.3 Clients must be provided access to this complaints policy and procedures at all business premises as well as through ancillary postal, fax, telephone and/or electronic means.
- 5.4 Any employee who receives a complaint from a client must request the client to lodge such complaint in writing and simultaneously provide the client with the communication particulars of the contact person.
- 5.5 Upon receipt, the contact person must enter the complaint in the complaints register which is held by the contact person.
- 5.6 If the complaint is received by any employee other than the contact person, the complaint should be handed to the contact person immediately.
- 5.7 The contact person may delegate resolution of the complaint to an appropriate person.
- 5.8 Complaints must be investigated and responded to promptly.
- 5.9 Complaints must be handled in a timely and fair manner.
- 5.10 Non-routine serious complaints must be handled at an appropriate level and by staff with adequate expertise.
- 5.11 All complaints must be resolved within 6 weeks of receipt thereof.
- 5.12 Should a complaint not be resolved to the satisfaction of the complainant, the complainant must be notified thereof within 6 weeks of receipt of the complaint and be advised of its right to lodge such complaint with the Ombud within 6 months of receipt of such notification, as well as be advised of any other legal remedies it may have.
- 5.13 The notification after dismissal of a complaint must include the name, address and other contact particulars of the Ombud.
- 5.14 If an outcome is not favourable to the client, full written reasons must be furnished to the client.
- 5.15 Where the complaint is resolved in the favour of the client, a full and appropriate level of redress must be offered to the client without any delay.
- 5.16 All complaints must be followed-up to ensure avoidance of occurrences giving rise to complaints and/or to improve services and systems and procedures, where necessary.
- 5.17 The complaints register must regularly be completed and inspected by the contact person who will exercise management control to ensure effective control and supervision of the complaints process.
- 5.18 The Compliance Officer will inspect the complaints register from time to time and monitor effective complaint resolution and compliance with the complaints process.
- 5.19 Records must be kept for a minimum period of 5 years together with an indication whether or not such complaint has been resolved, cases of non-compliance with the legislation and the reasons for such non-compliance.

# COMPLAINTS PROCESS

