

Complaints Management Policy

Important to note

The following subsidiaries of the FPM Group of Companies 'FPM' are covered by this policy for their respective rights and interests:

1. FPM Asset Management (Pty) Ltd – licensed as a Financial Services Provider under license number: 46763
2. FPM Employee Benefits (Pty) Ltd – licensed as a Financial Services Provider under license number: 46611
3. FPM Fiduciary Services (Pty) Ltd – not licensed as a Financial Services Provider
4. FPM Group Holdings (Pty) Ltd – not licensed as a Financial Services Provider
5. FPM Risk and Wealth Management (Pty) Ltd – licensed as a Financial Services Provider under license number: 46610
6. FPM Short Term Insurance Brokers (Pty) Ltd – licenses as a Financial Service Provider under license number: 8961

Amendments to this policy

1. FPM reserves the right to determine how this policy applies and to any particular situation and to amend or modify this policy as it, in its discretion, deems appropriate
2. This, FPM can do without giving prior notice to our having been in consultation or reaching agreement with any provider and/or its representatives
3. All amendments that FPM may make to this policy shall be communicated to employees

Purpose of the policy

1. This policy seeks to identify and categorise the possible complaints faced by FPM and then determine and detail the appropriate action to be taken following the occurrence of a complaint
2. We don't function in isolation or a static environment and it is important to review this policy at least annually or as and when the environment in which we operate changes
3. Further, it seeks to set out the process, procedures and internal controls to facilitate compliance with the policy as well as to highlight the consequences of non-compliance with the policy by FPM's employees and representatives

Leadership

1. FPM's Board of Directors oversee the business of FPM, including the compliance with all applicable legislation and this policy

We view complaints as a serious issue

1. All interaction with a complaint, be they our existing clients or third parties, will be considered with the highest possible level of courtesy and professionalism

Who is responsible for handling complaints?

1. Complaints are to be handled by the Department Manager
2. If a reportable complaint, meaning it is escalated to the Ombudsman, the Compliance Coordinator must be informed who, together with the Department Manager, are responsible for ensuring the complaint is brought to an effective, speedy and fair resolution
3. If resolution cannot be achieved, our external Compliant Officer must be informed

THE PROCEDURE

The primary objectives of this policy

1. Resolve the matter at hand
2. Identify the aspects that led to the complaint and ensure procedures are improved or established to prevent a reoccurrence

Based on the objectives above, the process below will be followed when receiving a reportable complaint 'the complaint' from our client.

1. The Department Manager will be informed immediately
2. The Department Manager will correspond with our client within 24-hours, acknowledging the complaint and confirming the process going forward
3. Details of the complaint will be sent to the Compliance Coordinator to be captured on the Complaints Register
4. Throughout the process, the Department Manager will correspond with our client on a daily basis to ensure that client is aware of progress at all times
5. If the complaint was made verbally, a concise and complete record of the complaint will be created in writing and sent our client
6. The FPM Complaint Form will be used for the purpose to ensure our records are complete
7. A file will be opened and labelled appropriately and held by the Compliance Coordinator
8. All correspondence pertinent to this case will be kept in the file created
9. If the complaint involves or relates to work carried out by an employee then the Department Manager and Compliance Coordinator will interview the employee and get a full understanding of the case at hand and request and file all supporting documentation
10. A formal investigation will be carried out by the Department Manager and any other parties who are able to provide assistance or insight into the complaint
11. If the investigations conclude that FPM was at fault, an offer of rectification will be formulated
12. The rectification offer, detailed facts of the case or offer of assistance will be made available to our client in writing without delay
13. Formal written response will be asked for in return to close the file
14. Any recommendation that system and/or processes be amended will be formulated in writing, agreed and implemented
15. If the matter is investigated and the complaint is found to be without foundation or based on incorrect or poor facts, a formal response will be sent to the complainant detailing that we will not be taking the matter further and most importantly, an explanation of how and why we have reached this decision
16. If the complainant does not accept the decision we will make an offer of mediation
 - a. This mediation will initially involve our external Compliance Officer
 - b. Other interested parties will also need to be involved depending on the nature of the complaint
17. Should the mediation not achieve resolution within 30 days from receipt of the complaint, the complainant will be advised of their right to escalate the matter to the relevant Ombud
 - a. This right will be communicated in writing and provide the contact details of the Ombud together with the necessary complaint registration form
18. Once completely resolved the full complaint record will be scanned and saved, the file close and the complaints register updated