



**Impact Settlement Capital – Client Complaints Handling
Policy**

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POLICY STATEMENT

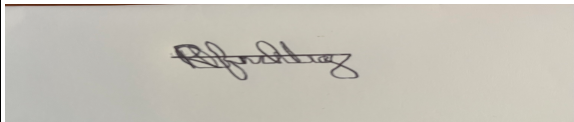
This Client Complaints Handling Policy (hereinafter the “**Policy**”) is in terms of section 17 of the General Code of Conduct (BN 80 of 2003) which requires FSPs to have in place effective governance systems.

The Board of Directors, employees, contractors, providers, and any other persons acting on behalf of Impact Settlement Capital (hereinafter the “**Company**”) are required to familiarise themselves with the Policy requirements and comply with the stated processes and procedures.

POLICY ADOPTION

By signing this document, I, on behalf of the Impact Settlement Capital Board of Directors, authorise the approval and adoption of the processes and procedures outlined herein.

DOCUMENT VERSION CONTROL

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Responsible Person Signature	
Responsible Person Signature	

1. DEFINITIONS

- 1.1. **Company:** refers to the Impact Settlement Capital (Pty) Limited duly registered under the company laws of the Republic of South Africa.
- 1.2. **Complaints:** refers to dissatisfactions about the service provided or dispute related to the product.
- 1.3. **Complainant:** refers to an individual, or jurist person or representative of an individual or juristic person who submits a complaint with Impact Settlement Capital.
- 1.4. **Complaints Officer:** this is the individual appointed by the Company to handle complaints, who works under the supervision of the Compliance officer.
- 1.5. **FAIS ombuds:** refers to the Financial Advisory and Intermediary Services Ombudsman, which was established in terms of the Financial Services Act, 37 of 2002.
- 1.6. **Query:** refers to requests for assistance with matters related to system failures, or glitches to the client portal.
- 1.7. **Query register:** complaints categorised as queries are to be log into the query register.

2. OBJECTIVE AND KEY PRINCIPLES

2.1. Impact Settlement Capital is committed to:

- 2.1.1. Resolving client complaints in a fair manner for clients.
- 2.1.2. Ensuring that customers are fully informed of complaints procedures.
- 2.1.3. Ensuring access to our complaint's resolution facilities by way of email, telephone or post.
- 2.1.4. Ensuring complaints handlers are adequately trained.
- 2.1.5. Dealing with complaints in a timely manner, with each complaint being treated on a case-by-case basis, based on the merits of the matter.
- 2.1.6. Where a complaint is resolved in favour of a client, offering full and appropriate redress.
- 2.1.7. Informing clients of their right to refer their complaints to the relevant Ombudsman should a complaint not be resolved to their satisfaction.

- 2.1.8. Maintaining records of all complaints received for a minimum period of five (5) years or as required by law.

3. SUBMITTING A COMPLAINT

- 3.1. All complaints should be referred to the Complaints Department at:

3.1.1. Email: info@isccapital.com

- 3.2. complaints should be submitted as follows:

3.2.1. in writing, by completing the complaints form (Annexure A) and emailing it to info@isccapital.com attaching all supporting documents relevant to the complaint to enable Impact Settlement Capital to attend to the complainant's concerns timeously.

3.2.2. Once a complaint is received an acknowledgement of receipt is sent to the complainant including reference to this complaint

4. COMPLAINTS PROCEDURE

Upon receipt of a complaint, the complaints officer shall categorise the complaint and allocate a complaint handler, and the below procedure shall be adhered to when handling complaints received from clients.

4.1. Client Queries

Clients may raise queries, by sending an email to the trader assisting or handling their trades. In the event the query is not resolved **within twenty-four (24) hours** clients may send complaints to the complaints officer at the address provided in clause 3.1 above.

4.2. Client Complaints

4.2.1. Client who are dissatisfied with the intermediary service, provided by the Company or any of its representative/employees must submit a complaint.

4.2.2. Impact Settlement Capital will not impose any charge for a complainant to make use of complaint processes and procedures.

4.2.3. The complaint handler will acknowledge receipt of the client's complaint within twenty-four (24) hours of submission. The acknowledgement will include a copy of the client's complaint together with the Dispute Resolution Process.

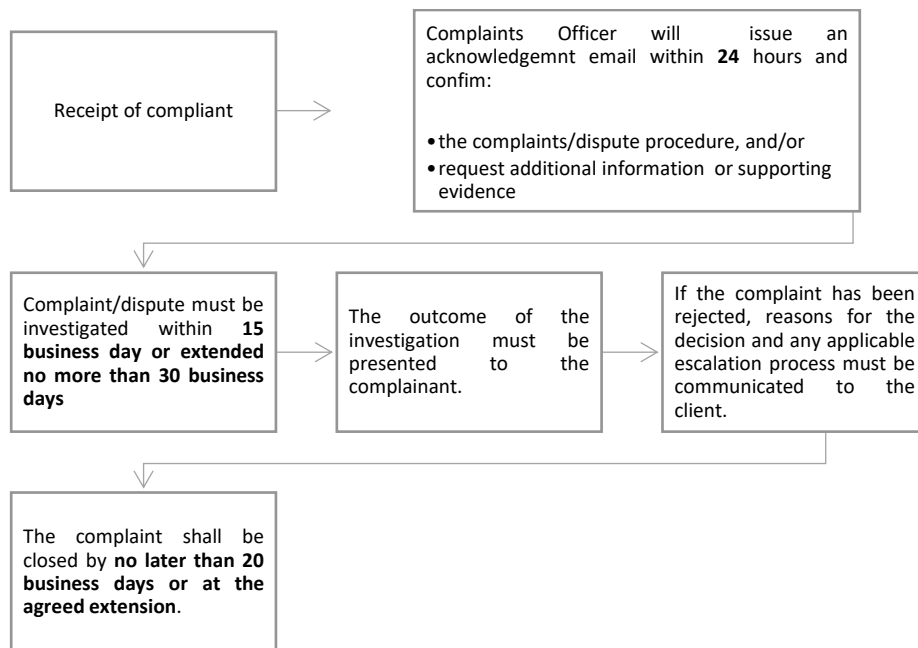
4.2.4. The Complainant must provide to the Company the following information:

- a) Your name, surname and contact details.
- b) A complete description of your complaint.
- c) The name of the person who provided you with financial advice or an intermediary service.
- d) The date on which the matter complained about occurred.
- e) All documentation relating to your complaint.

4.2.5. The complaint handler may request any relevant information if not provided by client at the submission of complaint.

4.3 Procedure on handling valid complaints

In the event the Complaints Officer handling the complaint has resolved that the complaint is valid, the Complaints Officer will follow the below procedure:



5 COMPLAINTS ESCALATION AND REVIEW PROCESS

5.1 Should a complainant not be satisfied with the outcome of a complaint, the complainant has the right to have the decision reviewed by another employee of the Company that holds the appropriate knowledge, expertise, experience, seniority and authority to deal with the review or escalation process.

5.2 If a complainant wishes to have a decision regarding a complaint reviewed:

5.2.1 Impact Settlement Capital will treat it as a Dispute.

5.2.2 When a decision has been made, the decider will respond to the complainant in writing giving:

5.2.3 Reasons for the decision.

5.2.4 Information about how to access external dispute resolution, and the time frame in which to do so.

6 FAIS OMBUD COMPLAINTS PROCEDURE

Should the complainant not be satisfied with the complaint's resolution he/she may re-direct the complaint and all supporting documents to the following parties, in writing, within a six (6) month period of receipt of such feedback from the Company to the FAIS Ombuds.

6.1 Ombud contact details

The contact details of the Fais Ombud are as follows:

THE FAIS OMBUD

Postal address: P.O. Box 41 Menlyn Park 0063

Tel: 086 0662 837 Fax: 012 3483447

Physical Address: 125 Dallas Avenue, Menlyn Central, Waterkloof Glen, Pretoria 0010

Email: info@faisombud.co.za

Website: www.faisombud.co.za

6.2 The Rules to Keep in Mind When Approaching the Ombud

6.2.1 In order for the Ombud to assist with your complaint, the total amount you are claiming may not exceed (eight hundred thousand Rand) R3 500 000, this includes both capital and income.

6.2.2 The complaint must relate to:

- a) An advisor/intermediary who advised you with regards to the product; or
- b) The product provider for the financial product or investment that was recommended by the advisor/intermediary.

6.2.3 If you have already approached a Court for assistance, the Ombud cannot help with your complaint.

6.2.4 The complainant must have already approached Impact Settlement Capital and provide them with a period of six (6) weeks to resolve the matter before the Ombud can help with a complaint.