

## **ECHELON PRIVATE CLIENT SOLUTIONS (PTY) LTD**

### **COMPLAINTS POLICY IN TERMS OF FAIS ACT AND TREATING CUSTOMERS FAIRLY 'TCF'**

#### **PREAMBLE**

Echelon will embed the principles of TCF into its culture as the cornerstone of its commitment to policyholders. A pragmatic approach is applied for TCF implementation balancing TCF outcomes and fairness with business sustainability and imperatives.

The approach to fairness will be governed by the following outcomes:

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| <b>Outcome 1</b> | Customers are confident that they are dealing with firms where the fair treatment of customers is central to the firm culture.  |
| <b>Outcome 2</b> | Products and services marketed and sold in the retail market are designed to meet the needs of identified customer groups and are targeted accordingly.                                 |
| <b>Outcome 3</b> | Customers are given clear information and are kept appropriately informed before, during and after the time of contracting.   |
| <b>Outcome 4</b> | Where customers receive advice, the advice is suitable and takes account of their circumstances.  |
| <b>Outcome 5</b> | Customers are provided with products that perform as firms have led them to expect, and the associated service is both of an acceptable standard and what they have been led to expect. |

**Outcome 6**

Customers do not face unreasonable post-sale barriers to change product, switch provider, submit a claim or make a complaint.

**COMPLAINTS POLICY**

**Complaint has to be in writing**

In order for a complaint to receive the attention that it deserves, we request that your complaint is submitted to us in writing. Please ensure, that where the complaint is delivered by hand or by any other means, that you retain proof of delivery.

**Complaint has to be relevant**

The financial services environment is complex. We will endeavour to address all reasonable requests from our clients, but may also refer you to a more appropriate facility. Where the complaint pertains to any aspect of our service, or any disclosures that ought to be made by us, we will endeavour to address those complaints in writing, within three days. In instances where the complaint pertains to something not within our control, such as product information or investment performance we will forward the complaint to the product provider concerned.

**Procedure**

The following is a step-by-step guideline of how a complaint will be dealt with, once received by us:

1. The complaint will be lodged in our central complaints register on the same day that it is made and confirmation of receipt forwarded to you.
2. The complaint is immediately brought to the attention of the Key Individual of this provider for allocation to the trained and skilled person who specialises in that type of complaint.
3. The complaint will be investigated and we will revert to you with our findings within three working days. In the event that you are not satisfied with our solution, you may refer the complaint to the CEO of our business.
4. The CEO may amend the solution or confirm it. Please be informed that certain decisions may have to be approved by the Board of Directors. In such a case, we will communicate the fact to you, as well as the date on which a decision will be taken.

5. If, after having referred the complaint to the CEO, you are still not satisfied with the outcome, we will regard the complaint as being unsatisfactorily resolved.
6. In such a case, you may approach the office of the Ombud for Financial Services Providers or take such other steps as may be advised by your legal representatives.
7. The referral to the office of the Ombud must be done in accordance with the provisions of section 21 of the FAIS Act and the rules promulgated in terms of that section.
8. In instances where we have not been able to arrive at a resolution within six weeks after you have lodged your complaint, the matter may automatically be referred to the Ombud.
9. You must, if you wish to refer a matter to the Ombud, do so within a period of six months.
10. The Ombud may not adjudicate in matters exceeding a value of R800,000.
11. The Ombud – Ms Noluntu Bam, may be contacted at her office in Pretoria, at the following address:

THE FAIS OMBUD  
PO Box 74571  
Lynwood Ridge  
0040  
Tel: (012) 470 9080  
Fax: (012) 348 3447

Sussex Office Park,  
Ground Floor,  
Block B, 473  
Lynwood Road,  
Lynwood 0081  
[info@faisombud.co.za](mailto:info@faisombud.co.za)

12. In the event of us not reverting to you within the time periods indicated above, kindly contact Mr Darrel Dawson [darrel@echelonpci.co.za](mailto:darrel@echelonpci.co.za) for an explanation as to why we have not yet communicated with you.
13. Please do not accept any communication from any person until it has been confirmed in writing.
14. Please note that all complaints are recorded in a register for analysis and management information to ensure consistent delivery of fair outcomes.

Johannesburg Tel No. : 011 023 2214   Pretoria Tel No.: 012 433 6300   Cape Town Tel No. : 021 657 1100   Durban Tel No.: 031 830 5057

Directors: HM Nigrini (Chairman), D Dawson\* (CEO), C Baruch, MJ Marinus, Q Matthew. \*Executive

Echelon Private Client Solutions (Pty) Ltd is an authorised financial services provider (licence number 40613)