



ALUMA CAPITAL (PTY) LTD

COMPLAINTS HANDLING PROCESS

1 THE COMPLAINTS PROCESS

1.1 RECEIVING A COMPLAINT

Clients must submit complaints in writing, using the contact details in the FAIS Introduction and Disclosure Letter or this Policy, including via the dedicated complaints mailbox. Where a complaint is received telephonically, Aluma Capital will request written confirmation of the details. Clients are asked to provide: their name and ID number, policy/investment number, adviser and product details, the nature of the complaint, and any supporting information.

1.2 CATEGORISATION

Complaints are categorised using the following categories, each linked to the relevant TCF Outcome so that trends and risks can be identified and addressed: Product features and charges (TCF Outcome 2); Information Disclosures (TCF Outcome 3); Advice (TCF Outcome 4); Product Performance (TCF Outcome 5); Client Services (TCF Outcome 5); Access, Changes or Switches (TCF Outcome 6); Complaints Handling (TCF Outcome 6); Claims (TCF Outcome 6); and Other complaints (TCF Outcome 1). The product type and complaint category assigned to each complaint automatically determine the applicable TCF Outcome in the Complaints Register.

1.3 ACKNOWLEDGEMENT AND ALLOCATION

- Acknowledge receipt of every complaint within 24 hours.
- Provide a single point of contact and a complaint reference number in the format “C-XXXXXX”, where XXXXXX is the client’s 6-digit policy/investment number (e.g. “C-653123”).
- Disclose the process, timelines and the contact details of the relevant Ombud at the outset.
- Allocate the complaint to the Head of Compliance or Compliance Officer, and provide the complainant with the allocated person's contact details within 48 hours.

1.4 RESOLUTION AND TIMELINES

Aluma Capital targets resolution of all complaints within 30 (thirty) days of receipt, consistent with the FAIS General Code of Conduct's requirement that providers act promptly and disclose their expected turnaround times. Aluma Capital's internal target, set out in its Complaints Management Framework, is to resolve all complaints within 10 working days of receipt wherever possible. Communication with complainants will be clear, in plain language, and free of charge. Where a complaint is upheld, any compensation or goodwill payment, or other agreed action, will be carried out without undue delay. Where a complaint is rejected, the complainant will be given clear and adequate reasons in writing and informed of their right to escalate the matter internally or to the relevant Ombud.

1.5 COMMUNICATION WITH COMPLAINANTS

Throughout the process, Aluma Capital will keep complainants informed of progress, the causes of any delay and revised timelines, and the final decision. Personal information collected during the complaints process will only be used to investigate and resolve the complaint, and will be processed in accordance with Aluma Capital's Privacy/POPIA Policy.

2. ESCALATION AND REVIEW

Aluma Capital maintains an internal complaints escalation and review process that is not unnecessarily complicated or burdensome for complainants. Complex or unusual complaints may be escalated by the initial complaint handler to the Head of Compliance and Key Individual. Escalated or reviewed complaints are dealt with in a balanced way that has regard to the legitimate interests of all parties and the fair treatment of clients, by an impartial, senior functionary.

3. ENGAGEMENT WITH THE OMBUD

Where a complaint cannot be resolved internally to the complainant's satisfaction, Aluma Capital will inform the client of their right to refer the matter to the FAIS Ombud within six months, and will cooperate fully with any resulting investigation, including providing all relevant documents and correspondence on request. The FAIS Ombud's contact details below:

THE FAIS OMBUD

125 Dallas Avenue,
Menlyn Central,
Waterkloof Glen,
Pretoria,
0010

Telephone 012 762 5000

E-mail info@faisombud.co.za

Website www.faisombud.co.za

4. RECORD KEEPING, MONITORING AND REPORTING

For each reportable complaint, Aluma Capital keeps a record of the complainant's details, the subject matter, all relevant evidence and correspondence, the categorisation, and the progress and status of the complaint against agreed timelines. On an ongoing basis, Aluma Capital tracks:

- The number of complaints received, upheld, and rejected (with reasons);
- The number of complaints escalated internally or referred to an Ombud, and their outcomes;
- The number and value of compensation and goodwill payments made; and
- The total number of complaints outstanding.

This information is reported to Aluma Capital's governing body or senior management on a quarterly basis, and is used to identify risks and trends, manage conduct risk, and improve outcomes for clients on an ongoing basis. Records relating to a complaint are retained for a minimum of five (5) years from the date of resolution, or such longer period as may be required by the FSCA or other applicable legislation.