TICKMILL SOUTH AFRICA

COMPLAINTS RESOLUTION PROCESS

July 2026

TICKMILL SOUTH AFRICA (PTY) LTD ("TICKMILL") is committed to treating all clients fairly. If you are dissatisfied with any financial product or service provided, you have the right to lodge a formal complaint. We will endeavour to resolve your complaint within **six (6) weeks** of receipt. The process below outlines the steps to follow.

CLASSIFICATION OF COMPLAINTS

Not all communications or issues raised by clients or users of the FSP (including, without limitation, technical issues, service requests, or general inquiries) constitute an official complaint for the purposes of this Policy. The FSP will classify such matters as a **Generic Complaint**. A matter will only be treated as an official complaint where it meets the definition and criteria set out below.

Where a generic complaint or issue is not resolved to the client's satisfaction, the FSP shall provide the client with clear information and guidance on how to submit a formal **Official Complaint** in accordance with the procedure set out in this Policy.

COMPLAINT CATEGORIES

The FSP will categorise all reportable complaints using the following minimum categories as required by the FAIS General Code of Conduct:

- Design of a financial product, financial service, or related service (including fees, premiums, or other charges)
- Information provided to clients
- Advice
- Financial product or financial service performance
- Service to clients (including premium/investment contribution collection or lapsing of a financial product)
- Complaints handling
- Insurance risk claims (including non-payment of claims)
- Other complaints

Each complaint will further be linked to the relevant TCF Outcome (1–6) to support conduct risk management and improved client outcomes.

Step 1: Submit Your Complaint

Submit your complaint in writing to our Complaints Manager. Please include your full name, contact details, account number, and a clear description of the issue. Complaints may be submitted by email or in writing to the address below.

When submitting your complaint, please also include the following information:

- Identity number
- Postal address
- Name of Financial Advisor (where applicable)
- Product Supplier and product type (e.g. Risk, Investment, Short-term, Endowment, Medical Aid, Unit Trust)
- Complaint category (as listed above)

Step 2: Acknowledgement

We will acknowledge receipt of your complaint in writing within **48 hours**. You will be assigned a reference number and informed of the expected timeframe for resolution.

Our acknowledgement will include:

- Contact details of the staff member handling your complaint
- Indicative timelines for resolution
- Details of our internal escalation and review process
- Details of the relevant Ombud and applicable timelines
- Rights of the complainant and duties of the FSP under the applicable Ombud rules

All communications with complainants will be in plain language. No charge will be imposed for making use of our complaints process.

Step 3: Investigation & Response

Your complaint will be investigated thoroughly and impartially. A formal written response will be provided within 6 weeks of acknowledgement. Complex matters may require additional time, in which case you will be kept informed of progress.

COMPLAINT RISK CLASSIFICATION

All complaints will be prioritised as follows:

Risk 1 - These are routine complaints with potentially low business impact.
Routine complaints:

- require a response to the client within 15 working days
- have the potential of becoming serious or official complaints if disregarded or ignored by the FSP
- require staff to review the complaint and its priority with the Complaints Manager/Key Individual before proceeding to the next step
- requires the Complaints Manager/Key Individual to decide on the appropriate person(s) to carry out subsequent steps, including the investigation

Risk 2 - These complaints are urgent and can have a serious business impact.

Serious complaints:

- require a response to the client within 5 - 10 working days
- are logged on media platforms, received from Legal Advisors or immediately evidence contravention of legislation requirements such as failure to conduct a proper Needs Analysis
- can cause reputational harm to a business and/or may cause financial loss to a client

- need to be handled by the Complaints Manager or a suitable senior person delegated to the task by the Complaints Manager.
- Complaints received from third parties and/or Legal Representative will be acknowledged within 24 hours:
    - The acknowledgment will formally request verification of authority to act on the complainant's behalf (such as a signed Power of Attorney or explicit written consent).

    - Strictly no confidential, financial, or personal information will be divulged to any third party who does not have the proper, verified authority to act on a complainant's behalf.

Risk 3 - These are urgent official complaints received from Authorities e.g. FAIS Ombud.
Urgent official complaints:

- are handled by the Complaints Manager
- Alternatively, the investigation of the complaint may be delegated to a suitable senior person selected by the Complaints Manager/Key Individual
- The required draft response and attachments will be collated by such senior person
- The Complaints Manager/Key Individual is responsible for compiling the response to the Authority
- The response to the Authority will be made within the stipulated turnaround time stated on the official correspondence.

During investigation, the FSP will:

- Analyse the root cause of the complaint to prevent recurrence
- Identify and clarify all internal and external key facts
- Escalate complaints relating to product features or services handled solely by a Product Supplier
- Keep the complainant updated on the progress of the investigation and notify them of any delays with revised timelines
- Document all areas of interaction and communication

RECORD KEEPING

In respect of each reportable complaint, the FSP will keep a record of:

- All relevant details of the complainant and the subject matter of the complaint
- Copies of all relevant evidence, correspondence, and decisions
- The complaint categorisation and TCF outcome linkage
- The progress and status of the complaint, including whether progress is within set timelines
- Number of complaints received, upheld, rejected (with reasoning), escalated, referred to an Ombud, and their outcomes
- Amounts of compensation payments and goodwill payments made

Step 4: Escalation

If your complaint is not resolved to your satisfaction, or if you have not received a response within six (6) weeks, you may escalate the matter to our external Compliance Officer or directly to the FAIS Ombud. Complaints to the Ombud must be lodged within **6 months** of TICKMILL's final response.

Where a complaint is **rejected**, the complainant will be provided with clear and adequate written reasons for the decision, and will be informed of all applicable escalation and review processes, including how to use them and any relevant time limits.

Where a complaint is **upheld**, any commitment by the FSP to make a compensation payment, goodwill payment, or to take any other action will be carried out without undue delay and within agreed timeframes.

If the FSP has been unable to resolve a complaint within **six (6) weeks** of receipt, a written acknowledgement will be sent to the complainant with the contact details of the relevant Ombud.

NOTE: Certain complaints (relating to Credit, Banking Services, Long-term Insurance, or Short-term Insurance) may be referred to the **National Financial Ombud (NFO)** rather than the FAIS Ombud. Contact details for all relevant Ombud offices are listed below.

ALLOCATION OF RESPONSIBILITIES

The Complaints Manager (Key Individual) is responsible for:

- Approving and overseeing the effectiveness of the implementation of this Complaints Resolution Process
- Making decisions or recommendations in respect of complaints, ensuring impartiality and freedom from conflicts of interest
- Managing the escalation and review process of complaints
- Reviewing the complaints register monthly and reporting to the Board on a quarterly basis
- Engaging with the relevant Ombud where required

Any person making decisions on complaints must be adequately trained with appropriate experience, knowledge, and skills in complaints handling, fair treatment of customers, the subject matter of the complaints, and relevant legal and regulatory matters.

MONITORING, ANALYSIS & REPORTING

The FSP will:

- Capture all complaints in a complaints register
- Review and analyse the register on an ongoing basis to manage conduct risks and effect improved client outcomes
- Report to the Board on a quarterly basis, including information on complaint categorisation, identified risks and trends, and actions taken

- Review this Complaints Resolution Process annually, or whenever there are material changes to the business

CONTACT DETAILS

TICKMILL Complaints	External Compliance	FAIS Ombud	National Financial Ombud Scheme (NFO)
Complaints Manager Email: Roger Eskinazi <roger@tickmill.com>;	**Oracle Compliance (Pty) Ltd** Leonardo d'Onofrio Tel: 011 100 2551 Email: info@oraclecompliance.com	**Office of the FAIS Ombud** PO Box 41, Menlyn Park, 0063 Tel: 012 762 5000 Email: info@faisombud.co.za www.faisombud.co.za	**Office of the NFO** 110 Oxford Road, Houghton Estate, Johannesburg, Gauteng, 2198 Tel: 0860 800 900 Email: info@nfombud.org.za www.nfombud.org.za

This complaints process is maintained in accordance with section 17 of the General Code of Conduct for Authorised Financial Services Providers and Representatives (Board Notice 80 of 2003). The service of the FAIS Ombud is free of charge. The decisions of the Ombud are binding on TICKMILL but not on the complainant. A copy of our full Complaints Management Framework is available on request.

TICKMILL SOUTH AFRICA (PTY) LTD is an authorised Financial Services Provider regulated by the FSCA under FAIS Act 37 of 2002