

**JUST GLOBAL MARKETS (PTY) LTD
COMPLAINTS HANDLING
PROCEDURE**

1. INTRODUCTION

Just Global Markets (Pty) Ltd is an authorized Financial Services Provider (**the “FSP”**), authorized and regulated by the Financial Services Conduct Authority (**“FSCA”**) under the FSP number 51114 and provides intermediary services in connection with derivative products and operates under the Financial Advisory and Intermediary Services Act, 2002 (**“FAIS Act”**).

One of the duties of the FSP is to establish a formal Complaints Handling procedure, which will enable the FSP’s Clients to exercise their rights as provided for in the FAIS Act.

The purpose of this Complaints Handling Policy (**the “Policy”**) is to inform Clients of the procedure that must be followed in order to submit a formal Complaint with the FSP. Please be advised that the FSP’s internal Complaints resolution procedure may be amended from time to time.

The Complaints Officer of the FSP is Mr. Jan Hendrik Scholtz and can be contacted on +27 (0) 83 631 6570 or jan@compliserve.co.za.

Just Global Markets (Pty) Ltd acts as an intermediary for Just Global Markets Ltd. (**the “Product Supplier”**), which is a Securities Dealer authorized and regulated by the Seychelles Financial Services Authority (**“FSA”**) with license number SD088. References to **“Client(s)”** mean persons having a direct agreement with the Product Supplier and who have been introduced by the FSP.

2. COMPLAINT HAS TO BE RELEVANT

In terms of the FAIS Act, a **“Complaint”** means a specific complaint relating to a intermediary service rendered by the FSP or a Representative(s) of the FSP, to the complainant on or after the date of commencement of the FAIS Act, and in which Complaint it is alleged that the FSP or Representative(s):

- has contravened or failed to comply with a provision of the FAIS Act and that as a result thereof the complainant has suffered or is likely to suffer financial prejudice or damage; or
- has wilfully or negligently rendered an intermediary service to the complainant which has caused prejudice or damage to the complainant or which is likely to result in such prejudice or damage; or
- has treated the complainant unfairly.

The intermediary services environment is complex. The FSP will endeavor to address all reasonable requests from Clients. Where the Complaint relates to any aspect of the FSP’s service, or any disclosures that ought to be made by the FSP, the FSP will endeavor to address those Complaints in writing, within seven (7) days.

In instances where the Complaint relates to any matter that is not within the FSP’s control and business operations, such as product information, transactions performed with the Product Supplier or investment performance, the Client is encouraged to raise a formal Complaint to the Product Supplier following the procedure that can be found on its website. If that is not possible, the FSP will transfer such Complaints to the Product Supplier.

3. COMPLAINT FORM

In case the Client is dissatisfied with the intermediary services provided by the FSP, the proper Complaint must be submitted according to the procedures set out in this Policy. In order for a Complaint to receive the proper attention, we request that your Complaint be submitted to us in writing to compliance@justmarkets.co.za using the form attached to this Policy (Appendix 1). The form has to be filled out truthfully, completely and accurately. The information required through the form is indicative and additional information and/or clarification and/or evidence may be requested.

4. COMPLAINT PROCEDURE

The FSPs internal Complaints resolution process is intended to provide fair and effective resolution of Complaints. The time periods set out in this procedure will be adhered to as strictly as possible but may be varied if necessary. The following step-by-step guideline sets out the procedures that the FSP has adopted in respect on how a Complaint will be dealt with, once received by the FSP:

- Your complaint and all communications in connection with your Complaint must be in writing or via email. All verbal communications made in connection with the Complaint must be confirmed in writing or via email within three (3) days of the communication.
- The Complaint Form shall contain as much information as possible, that as much as possible fields of the Complaint Form should be filled. Some fields are marked with an asterisk as mandatory.
- The Complaint will be entered into the FSP's Complaints Register on the same day that it is received, and written confirmation of receipt will be forwarded to the Client. The FSP will keep record of the Complaint and maintain such record for five (5) years as required by legislation.
- Upon the successful receipt of the Complaint, and within five (5) working days the FSP will acknowledge receipt of the Form. The FSP will then carry out an impartial review of the matter and communicate to the Client the outcome of our investigation and propose remedial actions (if applicable) within ten (10) working days from the date of the acknowledgement.
- In the unlikely event that the FSP is unable to respond within ten (10) working days, the FSP will inform the Client of the reasons for the delay and indicate the period of time within which it is possible to complete the investigation. In any event, the FSP shall provide the Client with the outcome of our investigation no later than one (1) month from the date of the acknowledgment, depending on the complexity of the case.
- If the Complaint relates to product information, or services offered by the Product Supplier, such Complaint will be forwarded to the Product Supplier within five (5) working days from the date of the acknowledgement. If the Complaint was forwarded to the Product Supplier for investigation, the Client will be informed accordingly and asked to contact the Product Supplier directly regarding the Complaint.
- If the Client is not satisfied with the outcome, the FSP will regard the Complaint as being unsatisfactorily resolved. In such a case, the Client may approach the office of the Ombud for Financial Services Providers or take such other steps as may be necessary.
- The Ombud acts as an adjudicator in disputes between clients and financial services providers. 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.
- The Ombud acts independently and objectively and has jurisdiction in respect of Complaints relating to advice or intermediary services, which has arisen after 15 November 2002.
- The Client must, if wishes to refer a matter to the Ombud, do so within six (6) months from the date of the notice in which the FSP informs the Client that the FSP is unable to resolve the

Complaint to the Client's satisfaction. The Ombud will not adjudicate in matters exceeding a value of R800 000.

- The Ombud may be contacted at their offices in Pretoria at the following address:

125 Dallas Avenue Menlyn Central,

Waterkloof Glen, Pretoria 0010

Tel: 012 762 5000

Sharecall: 086 066 3247

Email: info@faisombud.co.za

Website: www.faisombud.co.za

APPENDIX 1

COMPLAINT FORM

Fields marked with an asterisk (*) are mandatory

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|---|--|
| (*) First Name | |
| (*) Last Name | |
| (*) Date Of Birth | |
| (*) Nationality | |
| (*) Full Address | |
| (*) Country of Residence | |
| (*) Have you contacted the FSP regarding the matter of Complaint before? <i>If the answer if No, we recommend to contact the FSP before submitting a Complaint</i> | |
| If the answer to the previous question is Yes, please give us more information about your communication with the FSP, case number, date submitted, why the matter was not resolved. | |
| Date of incident subject to Complaint | |
| Subject of the Complaint, description of intermediary services you are dissatisfied. | |
| Description of the facts and the reasons for your Complaint, and how this affected you. Please write clearly and legibly. | |
| How should this complaint be resolved in your opinion? | |

Please attach any supporting documentation that may help us in the investigation and resolution of the matter.