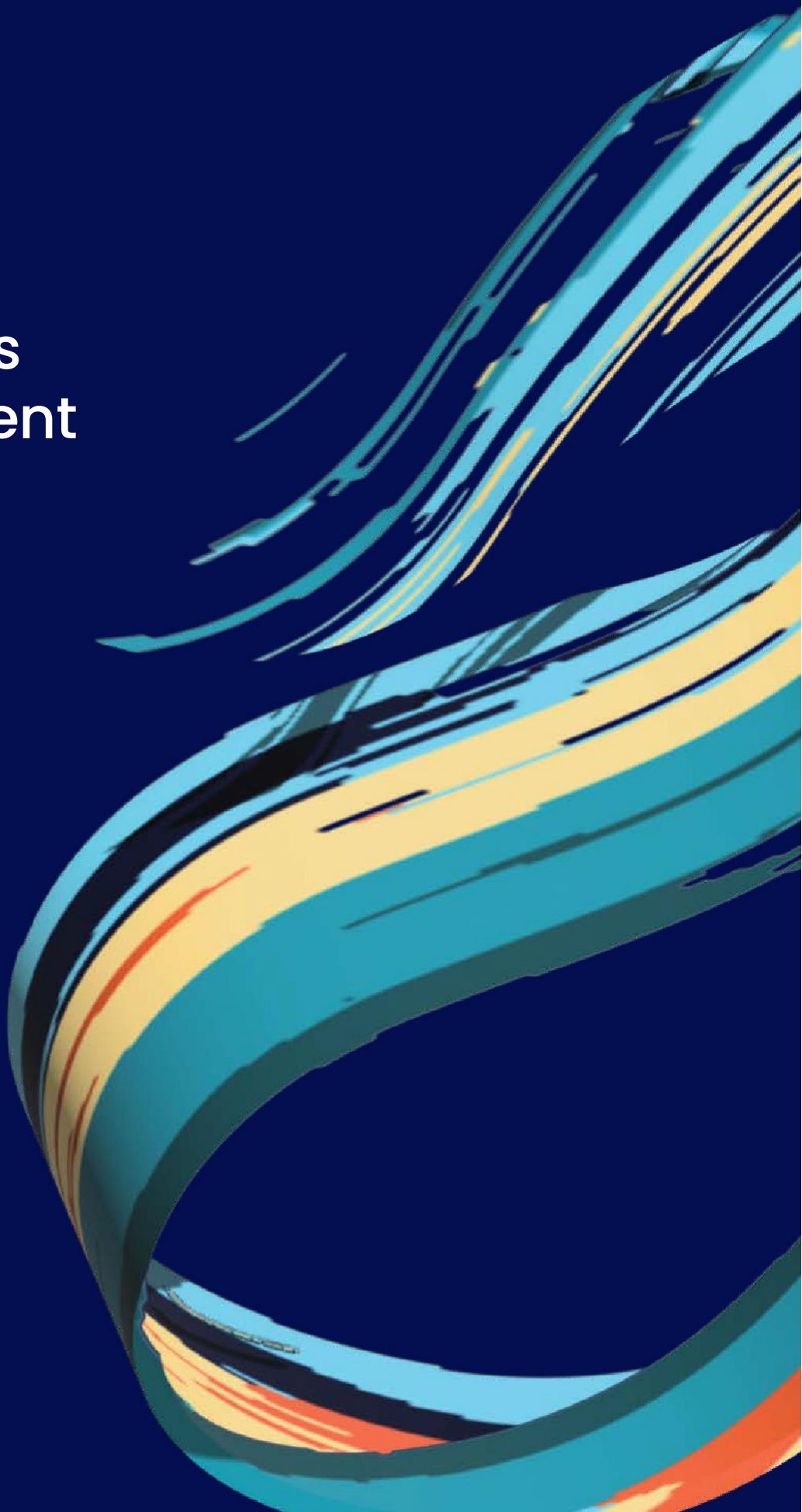


Complaints Management Policy

February
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1. Document Control

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12/04/2024	1.0	Draft	Momentum Investments Regulatory Compliance	Drafted

Document Review and Approval History

Date	Reviewer/Approval	Action/Comment
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2. Definitions and Acronyms

Complainant	<p>Means a person who submits a complaint and includes a:</p> <ul style="list-style-type: none"> • client, investor, unitholder, policyholder; • person nominated as the person in respect of whom a product supplier should meet financial product benefits or that persons' successor in title; • person whose life is insured under an insurance policy; • person that pays a premium or an investment amount in respect of a financial product; • member of a retirement fund; • person whose dissatisfaction relates to the approach, advertising material or an advertisement in respect of a financial product, financial service, or related service • who has a direct interest in the agreement, financial product, or financial service to which the complaint relates, or a person acting on behalf of a person referred to above.
Complaint	<p>Means an expression of dissatisfaction by a Complainant to Curate Investments or, to the knowledge of Curate Investments, to the Curate Investments' service supplier relating to a financial product or financial service provided or offered by Curate Investments which indicates or alleges that:</p> <ul style="list-style-type: none"> • Curate Investments has contravened or failed to comply with a law, a rule; an agreement or a code of conduct which is binding on Curate Investments or to which it subscribes. • Curate Investments' maladministration, willful or negligent action or failure to act has caused the Complainant harm, prejudice, distress, or substantial inconvenience. • Curate Investments has treated the Complainant unfairly.
Compensation Payment	<p>Means a payment, whether in monetary form or in the form of a benefit or service, by or on behalf of Curate Investments to a Complainant to compensate the Complainant for a proven or estimated financial loss incurred as a result of Curate Investments' contravention, non-compliance, action, failure to act, or unfair treatment forming the basis of the Complaint, where Curate Investments accept liability for having caused the loss concerned, but excludes any:</p> <ul style="list-style-type: none"> • goodwill payment. • payment contractually due to the Complainant in terms of the financial product or financial service concerned, including any interest on late payment thereof. • refund of an amount paid by or on behalf of the Complainant to Curate Investments where such payment was not contractually due, including any interest on late payment thereof.

Goodwill Payment	Means a payment, whether in monetary form or in the form of a benefit or service, by or on behalf of Curate Investments to a Complainant as an expression of goodwill aimed at resolving a Complaint, where Curate Investments does not accept liability for any financial loss to the Complainant as a result of the matter complained about.
Query	Means a request to Curate Investments or Curate Investments' service supplier by or on behalf of a client for information regarding Curate Investments' financial products, financial services, or related processes, or to carry out a transaction or action in relation to any such financial product or service.
Rejected	In relation to a Complaint, means that a complaint has not been upheld and Curate Investments regards the Complaint as finalised after advising the Complainant that it does not intend to take any further action to resolve the Complaint and includes Complaints regarded by Curate as unjustified or invalid, or where the Complainant does not accept or respond to Curate Investments' proposals to resolve the Complaint.
Reportable Complaint	Means any Complaint other than a complaint that has been: <ul style="list-style-type: none"> • upheld immediately by the person who initially received the complaint • upheld within Curate Investments' ordinary processes for handling Queries and Complaints, provided such process does not take more than five business days from the date the Complaint was received. • submitted or brought to the attention of Curate Investments in a manner that it does not have a reasonable opportunity to record such details of the Complaint as may be prescribed in relation to Reportable Complaints.
Upheld	Means that a Complaint has been finalised wholly or partially in favour of the Complainant and that: <ul style="list-style-type: none"> • the Complainant has explicitly accepted that the matter is fully resolved, • it is reasonable for Curate Investments to assume that the Complainant has so accepted • all undertakings made by Curate Investments to resolve the Complaint have been met or the Complainant has explicitly indicated their satisfaction with any arrangements to ensure such undertakings will be met.

3. Introduction

Curate Investments (Curate) is part of Momentum Group Limited (Momentum) and is committed to conduct itself with integrity, fairness and dignity when dealing with its clients. Momentum has adopted a Market Conduct Framework, which aims to create clear accountability for the management and oversight of market conduct practices within Momentum. As such, Curate maintains and operates this Complaints Management Policy to ensure the effective resolution of Complaints and the fair treatment of Complainants in line with the complaints management principles as set out in the Momentum Market Conduct Framework.

4. Objective

The objective of this policy is to ensure the effective resolution of Complaints and the fair treatment of Complainants. In this regard, Curate endeavours to treat customers fairly and ensure that there are no unreasonable barriers to Complainants within its complaints management process. This policy sets out the principles taken into account in the management of complaints to ensure that Complaints are handled in a timely and fair manner; and that, Complaints are investigated and responded to promptly.

5. Application and scope

This Policy applies to Curate.

6. Allocation of Responsibilities

- 6.1 The board of directors / governing body and key individuals (where applicable) of each business area is responsible for effective complaints management within the relevant business area; and must approve this policy and oversee the effectiveness of its implementation.
- 6.2. Momentum has governance and oversight structures to ensure the effective implementation of this policy, which include:
- Momentum Fair Practices Committee
 - Curate respective boards of directors or governing bodies
 - Curate Combined Assurance Forum
 - Curate Legal, Risk and Compliance
- 6.3. Curate will ensure that there are people responsible for making decisions or recommendations in respect of Complaints and that such people:
- are adequately trained;
 - have an appropriate mix of experience, knowledge and skills in complaints handling, fair treatment of customers, the subject matter of the complaints concerned and relevant legal and regulatory matters;
 - are not subject to a conflict of interest (including ensuring that remuneration and reward strategies incentivise the fair treatment of Complainants and objectivity in the complaints handling process) ; and
 - are adequately empowered to make impartial decisions or recommendations

7. Management and Categorisation of Complaints

- 7.1. Curate will categorise Reportable Complaints in accordance with the following minimum categories
- Complaints relating to the design of a financial product, financial service, or related service, including the fees, premiums or other fees or charges related to that financial product or financial service;
 - Complaints relating to information provided to clients;
 - Complaints relating to advice;
 - Complaints relating to financial product or financial service performance;
 - Complaints relating to a service to clients, including Complaints relating to premium or investment contribution collection or lapsing of a financial product;

- Complaints relating to financial product accessibility, changes, or switches, including Complaints relating to redemptions of investment;
- Complaints relating to complaints handling; and
- other complaints.

7.2. Curate may consider additional categories relevant to its business model, financial products, financial services, and client base that will support the effectiveness of this policy in managing conduct risks.

7.3. Curate's complaints handling procedure:

- We will acknowledge Complaints received via email as set out in Annexure 1 within 2hrs, or a reasonable period from receipt where extraordinary circumstances prevent this.
- We will acknowledge Complaints received via other channels within a reasonable time of receipt.
- Social media Complaints are handled by the social media team and will be acknowledged within a reasonable time of receipt.
- Regulatory complaints adhere to the timeline stipulated by the regulator. The acknowledgment of receipt will include the contact details of the person to be involved in the resolution of the Complaint, as well as a copy of this policy.
- Complaints received are assessed for validity, if a Complaint is valid, then it is recorded in the complaints register.
- An investigation of the Complaint is conducted by the person appointed to handle Complaints to ensure that:
 - the Complaint receives proper consideration;
 - appropriate management controls are available to exercise effective control and supervision of the consideration process; and
 - the Complainant is informed of the outcome of this process.
- the Complainant is informed of the outcome of the complaints resolution process within six weeks of the date of receipt of the initial Complaint, except where extraordinary circumstances prevent this:
 - where the Complaint is resolved in favour of the Complainant, Curate will ensure that a full and appropriate level of redress / Compensation Payment is offered to the Complainant without delay.
 - where the Complaint is not resolved in favour of or to the satisfaction of the Complainant, Curate will provide written feedback to the Complainant setting out the reasons for the decision, which states that:
 - the Complainant may refer the Complaint to the ombudsman if the Complainant wishes to pursue the Complaint, together with the details of the relevant ombudsman as set out in Annexure 1; and
 - the Complainant should do so within the prescribed period of receipt of such information.

7.3. Curate is committed to always adhere to the above timeframes when handling Complaints. If unforeseen circumstances disrupt Curate's business such that Curate is unable to meet the above timeframes, then Curate will ensure that the Complainant is timeously informed.

8. Complaints Escalation, Review Process and Decisions

- 8.1. Curate has established and maintains a comprehensive internal complaints escalation process which is managed and overseen by a duly authorised senior person to allow for the timeous finalisation of each Complaint.
- 8.2. The internal complaints escalation process should as far as reasonably possible be simple, easily understandable, and accessible to a Complainant. In addition, the internal escalation process should ensure a fair and impartial review of such escalated Complaint.
- 8.3. Curate's internal complaints escalation process is designed to:
 - be balanced and consider the legitimate interests of all parties involved including the fair treatment of Complainants.
 - provide for further escalation of complex or unusual complaints to a more senior person at the instance of the initial Complaint handler.
 - provide for Complainants to escalate Complaints not resolved to their satisfaction.
 - allocate Complaints to impartial and senior personnel within Curate.
- 8.4. The Complainant shall be, regardless of outcome, notified of the final decision. Where the Complainant is of the view that the Complaint has not been resolved to their satisfaction, Curate will provide guidance on further complaints escalation process, whether it be internal or otherwise.

9. Record Keeping, Monitoring and Analysis of Complaints

- 9.1. Curate will keep accurate, efficient, and secure record of all Complaints and related information received for a period of at least five years.
- 9.2. Curate will keep the following information for all Reportable Complaints:
 - all relevant details of the Complainant and the subject matter of the Complaint.
 - copies of all relevant evidence, correspondence, and decisions.
 - the complaint categorisation as set out above.
 - progress and status of the Complaint, including whether such progress is within or outside any set timelines.
- 9.3. In addition, Curate must keep the following data in relation to Reportable Complaints categorised as set out above:
 - number of Complaints received;
 - number of Complaints Upheld;
 - number of Complaints Rejected and reasons for the rejection;
 - number of Complaints escalated by Complainants to the internal complaints escalation process;
 - number of Complaints referred to an ombudsman and their outcome;
 - number and amounts of Compensation Payments made;
 - number and amounts of Goodwill Payments made; and
 - total number of Complaints outstanding.
- 9.4. Curate will analyse Complaints information recorded in accordance with this policy on an ongoing basis and use it to manage conduct risks including:
 - identifying new risks, trends and management action taken in response thereto;
 - improve fair outcomes for clients;
 - to prevent recurrences of poor outcomes and errors; and
 - the effectiveness and outcomes of the complaints management framework.
- 9.5. Curate must establish and maintain processes and procedures for reporting of the information generated from 9.4 above to its governing body and/or executive management.

10. Communication with Complainants and Engagement with Ombudsman

- 10.1. Curate must ensure that its complaints management process is understandable, transparent, visible, and freely accessible to Complainants through appropriate channels, and where possible through a single point of contact.
- 10.2. In addition, Curate must disclose to a Complainant:
- the type of information required from a Complainant.
 - the manner in which Complaints and related information must be submitted.
 - expected turnaround times in relation to Complaints.
 - any other relevant responsibilities of Complainants.
- 10.3. Moreover, Curate will ensure that the Complainant is kept adequately informed of:
- the progress of their Complaint.
 - causes of any delay in the finalisation of the Complaint (where applicable) and revised timelines.
 - the decision in response to the Complaint.
- 10.4. Curate must ensure open, honest, and co-operative communication between itself and any ombudsman with whom it deals. Furthermore, Curate is committed to resolving Complaints before a final determination or ruling is made by an ombudsman, or through its internal complaints escalation process, without impeding or unduly delaying Complainant's access to an ombudsman.

11. Reporting Complaints Information

Curate must report Complaints information in a manner and interval prescribed by any regulatory authority.

12. Consequences of non-compliance with the Policy

This policy is binding on all those to whom it applies, and non-compliance will be taken seriously. Curate is committed to enforce this policy and this may include disciplinary action against any person that transgresses its provisions. This policy is binding on all those to whom it applies, and non-compliance will be taken seriously. Curate is committed to enforce this policy and this may include disciplinary action against any person that transgresses its provisions.

13. Policy Review

This policy will be subject to a formal annual review to align it with legislative developments.

14. Availability

This policy is available on Curate website: curateinvestments.com/sa.

You can email your complaint to info@curate.co.za.

Annexure 1:

FAIS OMBUDS		National Financial Ombud Scheme South Africa NPC (the NFO)	
Physical Address:		Physical Address:	
Menlyn Central Office Building, 125 Dallas Avenue, Waterkloof Glen, Pretoria 0010		110 Oxford Road, Houghton Estate, Illovo, Johannesburg, 2198	
Post Address	: PO Box 41, : Menlyn Park, : 0063	CPT Physical Address:	Claremont Central Building, 6th Floor, 6 Vineyard Road, Claremont, 7708
Tel No	: 012 762 5000 / 086 066 3274	Tel	: 0860 -800-900
Email	: info@faisombud.co.za	Fax	: 021 674 0951
Web Address:	: www.faisombud.co.za	Email	: info@nfosa.co.za
		Web Address	: www.nfosa.co.za
Business Area Curate Investments		Contact Details info@curate.co.za	