MEDWAY COMPLAINTS POLICY

Last Review Date: September 2025
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Policy Owner: Medway Marketing (Pty) Ltd (FSP15624)

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Purpose of This Policy

This policy explains how Medway Marketing handles complaints in a fair, transparent, and efficient manner. It ensures compliance with Section 17(1)(a) of the General Code of Conduct for Authorised Financial Services Providers and Representatives ("the General Code of Conduct").
Our goal is to resolve complaints fairly, efficiently, and consistently, while treating all clients and complainants with respect and ensuring fair outcomes.

The complaints management framework is designed to:
- Fit our services, clients, and operating model.
- Ensure every complaint is investigated thoroughly and fairly.
- Avoid unnecessary barriers to lodging a complaint.
- Meet all requirements of Part XI of the General Code of Conduct.

Key Definitions

What is a Complaint?

A complaint is any expression of dissatisfaction about a financial product or service provided or offered by Medway Marketing, whether made directly to us or through a service provider.

A complaint may involve:
- Alleged non-compliance with an agreement, law, rule, or code of conduct.
- Maladministration, negligence, or failure to act, causing harm or inconvenience.
- Perceived unfair treatment.

Who is a Complainant?
A complainant is any person who submits a complaint, including:
- A client.
- Someone entitled to financial product benefits or their successor.
- A person insured under a policy.
- A person paying premiums.
- A member of a group scheme or similar structure.
- Anyone dissatisfied with our marketing, advertising, or service approach.

Client Query vs Complaint
A client query is a request for information or an action (e.g., account details or transaction assistance).
A complaint involves dissatisfaction or perceived wrongdoing.

Compensation and Goodwill Payments
- Compensation payment: A payment made to cover proven or estimated financial loss caused by the company's action, omission, or error. It excludes goodwill gestures, contractual payments, or refunds of amounts not due.
- Goodwill payment: A voluntary payment or benefit offered as a gesture of goodwill to resolve a complaint, without admitting liability.

Our Commitment to Clients

Medway Marketing is committed to:
- Providing financial services with care, diligence, and in clients' best interests.
- Offering a fair and accessible complaints process.
- Regularly reviewing and improving our complaints management framework.
- Ensuring complaints are resolved promptly, fairly, and without bias.
- Maintaining open communication with clients and regulatory bodies.

The Complaints Management Framework

Our framework includes clear processes, roles, and standards to ensure consistent, objective, and effective complaints handling.

Key Components
- Defined responsibilities for managing complaints throughout the business.
- Performance standards that encourage objectivity and fairness.
- Documented procedures outlining how complaints are received, categorised, and resolved, with expected timeframes and escalation steps.
- Regular monitoring and analysis of complaint data to identify trends, risks, and areas for improvement.
- Reporting to executive management and the board on complaint trends and outcomes.

Communication and Transparency
- Complainants are kept informed throughout the process.
- Information about how to lodge complaints and contact details for relevant Ombuds are readily available in all our policy documents and on our website.

Roles and Responsibilities

- Board of Directors: Responsible for overall oversight and ensuring an effective complaints management system.
- Key Individual: Oversees implementation and effectiveness of the framework.
- General Manager: Is delegated to manage the internal review and escalation process.
- All staff : Are expected to support the complaints process and uphold the company's commitment to fairness and transparency.

Decision-Making and Fair Treatment

Those who handle or decide on complaints must:
- Be adequately trained and experienced.
- Understand complaint handling principles and relevant regulations.
- Be free from conflicts of interest.
- Have authority to make fair and impartial decisions.

Types of Complaints

Medway Marketing categorises complaints into the following types:
Product or service design, including fees and charges.
Information provided to clients.

Financial advice.
Product or service performance.
Client service issues (e.g., billing, contributions, lapses).
Product accessibility or changes (e.g., investment switches, redemptions).
Complaint handling process.
Insurance risk claims (e.g., non-payment of claims).
Other complaints not covered above.

Internal Escalation and Review Process

Medway Marketing maintains a simple, accessible, and fair internal escalation process.
Key Principles
- The process avoids unnecessary complexity or paperwork.
- It balances the interests of all parties.
- Complex or unresolved complaints may be escalated to senior staff or the Complaint Dispute Facilitator.
- Complainants who are not satisfied with the initial outcome may request escalation.
- The Complaint Dispute Facilitator is responsible for impartial oversight of the process.

Decisions and Outcomes

When a Complaint is Upheld
- Any agreed compensation or goodwill payment will be made promptly within agreed timeframes.
- All commitments to resolve the matter will be honored without delay.
When a Complaint is Rejected
- The complainant will receive clear, written reasons for the decision.
- The complainant will be informed of the escalation and review options and any applicable time limits.
- Information on the relevant Ombud, including contact details, will be provided at the start of the relationship and in key communications.

Engagement with the Ombud and Regulatory Reporting

Medway Marketing maintains open, transparent engagement with any relevant Ombud and the Regulator.
We will:
- Monitor Ombud determinations and guidance to identify risks or areas for improvement.
- Communicate and cooperate fully with Ombuds where applicable.
- Strive to resolve matters internally before a formal determination, without restricting the complainant's right to approach the Ombud.
- Ensure all regulatory reporting requirements are met accurately and on time.
- Keep complaint records for at least five years, including the resolution status and outcomes.

Continuous Improvement

The complaints policy and the complaints management framework are reviewed regularly to ensure they both remain effective, compliant, and aligned with best practices.
Feedback from clients, Ombud determinations, and internal analysis are used to improve systems, service quality, and client outcomes.

Review Date	Reviewed By	Designation	Signature