EMPLOYEE BENEFITS

Complaints Management Procedure Document

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OBJECTIVE

SALT Employee Benefits (Pty) Ltd (referred to as ("SALT EB") is an approved pension fund benefit administrator in terms of section 13B of the Pension Funds Act, No. 24 of 1956("PENSION FUNDS ACT") as well as a licensed financial services provider in terms of the Financial Advisory and Intermediary Services Act, No. 37 of 2002("FAIS ACT")

We are committed to manage and process complaints in a manner that complies with all applicable laws and regulatory requirements, including handling your personal complaints data and information in a manner which complies with Protection of Personal Information Act, 2013. As such, SALT EB has aligned its business model, strategy, business processes, product and services models in compliance with all applicable legislative requirements and the implementation of the Treating Customer Fairly ("TCF") outcomes as a core principle of its organisational culture, business and operations.

Complaints data and customer feedback information are a valuable source of information and are analysed to measure compliance and satisfactory customer outcomes, and to continuously improve our products and services to meet the needs and expectations of our customers.

In achieving this, we implement and continuously maintain a Complaints Handling Procedure which is adequate and effective and will not impose unreasonable barriers to you to submit a complaint to us. The process has been designed to be easy to understand and enables seamless access to the complaints management process and aims to deliver on the expected outcomes in an objective, independent timeous and fair manner and to provide you with clear and understandable communication during the process, suitable advice and to provide you with a fair outcome to your complaint.

Who can submit a complaint to SALT EB?

- A Customer or potential customer (e.g. fund member, employer, pension/retirement fund, client of a FAIS financial product or service)
- beneficiary or successor in title of the customer of SALT EB of a financial product or service provided or administered by SALT EB (e.g. beneficiary of a death benefit of a retirement fund member)
- Any person acting on behalf of a customer (e.g. representatives or advisor) who have the relevant authority to act on behalf of the customer

What is a complaint?

A complaint is an expression of dissatisfaction relating to any of the financial products or services provided or offered by SALT EB. This could amongst others include, that SALT EB-
- contravened or failed to comply with an agreement, a law, a rule, or a code of conduct which is binding on it or to which it subscribe;
- maladministration or wilful or negligent action or failure to act, and has caused harm, prejudice, distress or substantial inconvenience; or
- unfair treatment of a customer.

Examples include incorrect benefit payments, delays in processing claims, complaints about complaints handling, and unacceptable products or services provided by SALT EB.

How much does it cost?

This complaint handling process is offered **free** of charge

> ***It is important to note that submitting a complaint utilizing our process is free of charge and you are not required to make use of a third party to submit or handle your complaint.***
>
> ***Also be aware not to give your personal information to any person other than a duly authorised employee at SALT EB and only to respond with SALT EB through the secured methods and channels as other entities or persons may attempt to unlawfully obtain your personal information or benefits from any of your financial products.***

Methods or channels to submit a complaint

The following methods and channels are secure for submitting your complaint

Phone	011 544 8300
Customer Call Centre	087 240 7004
WhatsApp	087 240 7004
Website	"Fund Logins Tab" on the SALT EB Website (www.SALTeb.co.za) or https://www.salteb.co.za/contact/feedback
Email	compliance@salteb.co.za
In person	Hertford Office Park Building B, Hertford Office Park Bekker Rd, Vorna Valley, Midrand *or* Member Walk-In Centres Johannesburg -1st Floor, 108 Fox Street, Marshalltown Cape Town – Thomas Pattullo, 5th Floor, West Wing, 19 Jan Smuts Street, Foreshore Durban – 214 Dr.Pixley Ka Sema Street, Liberty Towers Port Elizabeth – Pier 14 Shopping Mall, 2nd Floor, Govan Mbeki Ave, North End Bloemfontein – No 6 Miriam Makeba Street, Finbond Building, 2nd Floor
Member Contact Centre	**Transport Sector Retirement Fund (TSRF)** Call Centre: 087 405 6377 Email Address: TSRF.info@salteb.co.za WhatsApp: 087 240 7004 **Umbrella Pension and Provident Funds** Email: umbrella.claims@salteb.co.za **Private Security Sector Unclaimed Benefit Provident Fund** Email: PSSUBPF.Exits@salteb.co.za **Private Security Sector Provident Fund (PSSPF)** Call Centre: 086 117 7775 WhatsApp: 087 240 7006 Email: psspf.contributions@salteb.co.za (for contribution schedules and contribution queries Email: PSSPFcontributions.queries@salteb.co.za (claims, contributions and queries) **South African Local Authorities Beneficiary Fund** Phone: +27 11 544 8300
SALT EB mobile Centre:	Contact SALT EB at compliance@salteb.co.za to find out when the SALT EB mobile centre will be in your area

Information to be provided when submitting a complaint

Kindly provide as much information as possible to assist in handling and resolving your complaint as quickly and efficiently as possible and to avoid undue delays by requesting you to provide additional information or documentation. Please provide at least the following –

- your full names, ID number and contact details (please indicate preferred contact method e.g. cell number, email)
- details in respect of which the complaint is made, i.e. retirement fund name, employer name, member/reference number (you can find a lot of this information on your payslip as an example)
- relevant documents or information in respect of which the complaint is made, i.e. incorrect benefit payment statement, withdrawal from service dates and documentation, etc.
- details of the reason or basis of the complaint and the effect thereof
- the expected outcome of the complaint
- permission to SALT EB to use personal information provided to resolve the complaint.

Authorising another person to submit or handle your complaint on your behalf

When you authorize another entity or person to submit a complaint on your behalf, in addition to the abovementioned, you need to provide the following:

- A letter of authority from you, authorizing that person to handle the complaint on your behalf;
- Persons or entity's details who you authorised to submit the complaint on your behalf; and
- Authority to the person or entity to provide SALT EB with your personal information for purposes of submitting and handling the complaint on your behalf.

What you can expect once you submit your complaint

1. **Acknowledgement of receipt**

    - We will confirm receipt of the complaint within 24 hours of receipt thereof
    - Our aim is to objectively resolve and provide you with an outcome of your complaint within 7 business days in a clear and understandable manner
    - Where possible, your complaint will be attended to and resolved immediately at the first point of contact.
    - The acknowledgement will provide you with the name and contact details of the Complaints Handler responsible for your handling your complaint as well as the expected timeline for resolving the complaint.
    - We will provide you with a list of other information or documentation required to enable the Complaints Handler to investigate the complaint.

2. **Investigation**

    - The Complaints Handler will investigate the complaint thoroughly and impartially
    - If further information is required, you will be informed without delay
    - All relevant information, facts, laws and TCF outcomes will be considered to ensure that a fair outcome is achieved

3. **Communication and resolution**

- Where an unexpected delay is foreseen (e.g. for complex issues or where third-party information is required), you will be advised within 7 business days with the reason for the delay, be provided with such amended timelines and continuous feedback every 3rd business day until resolved.
- Once your complaint has been resolved, you will be provided with a written response (your preferred communication method, i.e. Email, post) setting out:
  - the outcome of the complaint and the motivation thereof
  - any further actions to be taken (e.g. corrections, refund, amended statements)
  - if your complaint is upheld (agree fully or partly), an explanation on corrective action and timelines thereto
  - if your complaint is rejected, you will be provided with the appropriate reasons

What to do if you are not satisfied with the outcome of your complaint

- If you are not satisfied with the outcome of your complaint, you can inform the complaint handler and request for internal review (also provided free of charge) within 20 business days from the date you were provided with the outcome of your complaint to be escalated for review.
- The initial outcome of your complaint will be referred to an independent senior manager who was not part of the initial complaint handling process for an objective and impartial review. The outcome of the review will be provided with the review outcome within 10 business days

What to do if you are still not satisfied with the outcome of the escalated complaint handling procedure

If you are still not satisfied with the outcome of the escalated complaints process, you can submit your complaint to the relevant independent office, being the Pension Funds Adjudicator, Ombud or Information Regulator. This independent review is also free, however there may be time limits and you are advised to act without delay if you wish to make use of this option.

The following bodies are independent, and we commit to fully co-operate with them in resolving your complaint.

1. **Pension Funds Adjudicator ("OPFA")**

   For complaints about retirement fund or retirement fund administrator matters or services (e.g. benefit payments, contributions, distributions or withholdings in terms of section 37D or the Pension Funds Act)

   Contact: Phone +27 12 346 1738 | Email info@pfa.org.za | Website www.pfa.org.za | Postal address: PO Box 580, Menlyn, 0063

   Please note the following requirements of the Office of the Pension Funds Adjudicator (OPFA) for submission of a complaint:
   - Complaints to the OPFA must be lodged within three years from the date of act or omission, and this period is calculated in accordance with the Prescription Act, no 68 of 1969.
   - Before you submit your complaint to the OPFA, address your complaint to the party against whom you are complaining in writing and wait for a response. If after 30 days you have not

received a response or you have received a response you are not happy with, you may submit your complaint to the OPFA.

- For the OPFA to investigate a complaint you may have against a pension fund organisation, it must be submitted in writing, and the fund must be registered under the Pension Funds Act, no 24 of 1956. Simply complete the OPFA complaint form and submit with a copy of your ID and proof of fund membership (benefit statement or payslip) and any other documentation relating to your complaint to the OPFA. The complaint can also be submitted online – see website address above.

2. FAIS Ombud

For complaints about financial advisory or intermediary services (e.g. consulting advice, investment advice or risk benefit advice).

Contact: Phone +27 12 762 5000 | Email info@faisombud.co.za | Website www.faisombud.co.za | Postal address: P O Box 41, Menlyn Park, 0063.

Please note the following FAIS Ombud requirements for submission of a complaint:

- Before submitting a complaint to the FAIS Ombud, you must try to resolve the complaint with the responding party. It is recommended that it be done in writing and records be maintained as proof.
- The FAIS Ombud has a monetary jurisdictional limit of R3 500 000, which means that the FAIS Ombud is not allowed to entertain a case where the amount claimed exceeds R3 500 000 unless two events take place:
    - the complainant abandon the amount more than R3 500 000 to bring the claim within the jurisdictional limits of the FAIS Ombud; and
    - the person against whom the complaint is lodged agrees that the FAIS Ombud entertains the complaint.
- The FAIS Ombud will not investigate a complaint where, before the date of receipt of the complaint by the FAIS Ombud, or during an investigation by the FAIS Ombud, the complainant institutes proceedings in a court regarding the subject matter of the complaint.
- The FAIS Ombud may not investigate complaints where the complainant became aware or ought to have become aware of the act or omission complained of more than years before the receipt thereof by the FAIS Ombud. In other words, you have 3 years to lodge a complaint with the FAIS Ombud from when you become aware of the concerns surrounding the financial service rendered.

3. National Financial Ombud Scheme ("NFO")

The NFO is an umbrella Financial Services Ombud scheme formed by the amalgamation of 4 separate previously existing South African Ombud Schemes: **the offices of the Banking Ombud, the Credit Ombud, the office of the Long-term Insurance Ombud, and the Short-Term Insurance Ombudsman.**

For complaints about insurance products (e.g. funeral policies, group life insurance)

Contact: Phone +27 (0)66 473 0157 | Email info@nfosa.co.za | Website www.nfosa.co.za |
Address: 110 Oxford Road, Houghton Estate, Johannesburg, 2198 and
6th Floor, Claremont Central Building, 6 Vineyard Road, Claremont, Cape Town, 7708

4. **Information Regulator**

The Information Regulator is responsible to monitor and enforce compliance of the protection of personal information processed by public and private bodies. Should you have any complaints regarding, e.g. unauthorised sharing or disclosure of your personal information, failure to secure your data, collection of your personal information without your knowledge or consent, you can lodge a complaint with the Information Regulator.

Contact: Toll Free 0800 017 160 | Landline 010 023 5200 | Email enquiries@inforegulator.org.za | Website https://inforegulator.org.za

5. **Financial Services Tribunal ("FST")**

If you are aggrieved by a determination of the Pension Funds Adjudicator or the FAIS Ombud, you may apply to the FST for reconsideration of that decision. An application for reconsideration must be made:
(a) in accordance with the Tribunal Rules (available on the FST's website); and
(b) within the time periods set out in section 230(2) of the Financial Sector Regulation Act ("FSRA").

The FST is an independent body established under the Financial Sector Regulation Act, 2017, to reconsider certain decisions made by the financial sector decision-makers, including determinations by the Pension Funds Adjudicator or the FAIS Ombud, as well as specific decisions by the FSCA where applicable.

The relevant Tribunal Rules must be checked (available on the FST's website) for specifics, however applications for reconsideration must typically be submitted within 30 days after receiving a statement of reasons (if reasons were requested under section 229 of the FSRA) or, in other cases, within 60 days after being notified of the decision, or such longer period as the Tribunal may allow on good cause shown (e.g. for condonation of late applications).

The process involves lodging a written application with the Tribunal, including full particulars of the grounds for reconsideration, and may require supporting documents. The Tribunal will then reconsider the matter on the papers or, where necessary, hold a hearing.

This option provides an additional layer of independent review to ensure fairness in financial sector decisions.

Contact: +27 12 741 4300 | Email applications@fstribunal.co.za | Website https://www.fsca.co.za/Financial-Services-Tribunal/ | Physical address: Kasteel Office Park, Orange Building (2nd Floor), 547 Jochemus Street, Erasmuskloof, Pretoria, 0048 | Postal address PO Box 36742, Menlopark, 0102

Additional Information regarding record keeping

All information and records are handled and kept confidentially in accordance with the Protection of Personal Information Act, 2013 and maintained for a period of 5 years. However, we may have to approach a third party for information in relation to your complaint, i.e. retirement fund, insurer, investment manager or employer.