

BILLMAR CAPITAL (PTY) LTD
Complaints Handling Policy
Initial Version, August 2022

1. INTRODUCTION

BILLMAR CAPITAL (PTY) LTD is an Investment Firm that owns and operates the brand “Billmar Capital” (www.billmarcapital.com). BILLMAR CAPITAL (PTY) LTD is registered in South Africa, company number 2016/214844/07, and is authorized and regulated by the Financial Sector Conduct Authority ("FSCA") of South Africa with license number 471259 to carry out certain categories of financial investment business as permitted under section 8 of the Financial Advisory and Intermediary Services Act, 2002 (Act No.37 of 2002). The Company’s registered office is located at 3rd Floor Palm Grove, Houghton Estate Office Park, 2 Osborn Road, Houghton, 2198 Gauteng. Please refer to the www.billmarcapital.com of the Company for more information.

The Company is operating under the Section 8 of the Financial Advisory and Intermediary Services Act, 2002 (Act No.37 of 2002) (collectively the “Act and Applicable Regulations”).

The brand “Billmar Capital” is owned and operated by BILLMAR CAPITAL (PTY) LTD duly registered in South Africa with a registration number 2016/214844/07 holder of an FSCA license with number 471259 and registered address at 3rd Floor Palm Grove, Houghton Estate Office Park, 2 Osborn Road, Houghton, 2198 Gauteng.

This Complaint Handling Policy (hereinafter referred to as the “**Policy**”) sets out the processes employed by the Company for the fair and prompt handling of queries, complaints and grievances received by the Company’s clients.

2. SCOPE

This Policy applies to the Company’s employees whereas it is subject to the approval of the Board of Directors of the Company, which is responsible for its implementation and for monitoring compliance with it. The present Policy includes the complaints’ management policy mechanism implemented by the Company and all the steps and procedures adhered to when handling clients’ complaints.

The Company has implemented all necessary mechanisms in order to ensure the efficient handling of complaints by eliminating regulatory and legal risk exposure as well as supporting the long-term business operations of the Company therefore eliminating any potential reputational or operational business impacts.

3. COMPLAINTS’ HANDLING

The Company’s Complaints Management Function is responsible for the complaints’

handling.

The Compliance Function of the Company maintains an Internal Complaints Register documenting the complaints received and the actions taken in that respect whereas it is also responsible for the analysis of the complaints and handling procedures in order to ensure that all issues which may arise are promptly identified and addressed according to the applicable framework.

4. DEFINITION OF A COMPLAINT AND COMPLAINANT

A Complaint is an expression of dissatisfaction by a client regarding the provision of investment and/ or ancillary services provided by BILLMAR CAPITAL (PTY) LTD and its brand “Billmar Capital”.

A Complainant is defined as any person, natural or legal, who has read, agreed with and accepted all the Terms and Conditions of the Company which are contained in the Client Agreement and without modifications, has opened a trading account with the Company and has submitted a Complaint.

5. PROCEDURE

Before submitting an official complaint, it is advisable that you first contact our Customer Support Department via email at www.billmarcapital.com, telephone or any other method of communication made available by the Company, as the vast majority of issues can be resolved at this level. Our Customer Support Department will try to resolve the issue immediately.

If you are not satisfied with the response and explanation given by our Customer Support Department and you wish to file an official complaint, you may complete the official [Complaint Form](#) attached also herein (the “**Form**”) and submit it electronically to complaints@billmarcapital.com. The Company will not accept any complaint via other means or channels.

The Company shall acknowledge receipt of your complaint within five (5) business days from the receipt of your complaint. Once we acknowledge receipt of your complaint, we will review it carefully, investigate the circumstances surrounding your complaint and will try to resolve it without undue delay.

The investigation of the Complaint is subject to the provision of the correct information by the Complainant. All of the information requested in the online complaints form must be provided (among any other information requested by the Company) in order to enable the investigation of the complaint.

The Compliance Department shall thoroughly examine any Complaints as required (taking into account any information contained within the books and records of the Company, including but not limited to the client’s trading account journal) to reach a fair outcome.

The outcome of the investigation shall be communicated to the Complainant within two (2) months from the date of receipt of the Complaint.

If we do not reply within the above mentioned period, you will be issued a holding response (in writing or other durable medium) where you will be informed of the reason/s for the delay and the period of time necessary to complete the investigation. This period of time shall not exceed three (3) months from the submission of the Complaint.

During the investigation process will keep you updated of the handling process of your complaint. One of our representatives may contact you directly (including communication by email or phone) in order to obtain further clarifications and information relating to your complaint. We will require your full cooperation in order to expedite the investigation and possible resolution of your complaint.

When the final decision of the Complaint does not fully satisfy the complainant's demands, the Company shall notify in writing the complainant using a thorough explanation of its position on the Complaint and set out the complainant's option to maintain the Complaint.

In case you are not fully satisfied with the Company's final decision, you may be entitled to raise your Complaint with the Financial Sector Conduct Authority (FSCA) in South Africa. You should note that the FSCA will not attend your complaint, unless it is satisfied that the issue has been brought to the Company's attention first.

6. CONFIDENTIALITY

All Complaints shall be treated with confidentiality.

7. MONITORING COMPLAINTS

The Company's Compliance Function is required to analyze complaints and handling information in order to ensure that any recurring findings and/or potential systemic problems are identified and addressed therefore eliminating potential legal and operational risks for example by:

1. Analyzing the causes of individual complaints so as to identify root causes common to types of complaint;
2. Considering whether such root causes may also affect other processes or products, including those not directly complained of; and;
3. Correcting, where reasonable to do so, such root causes.

The responsible person handling the complaints shall inform the Compliance Function of all the information mentioned hereinabove for the purpose of notifying all relevant departments, analyse complaints and improve any areas necessary to prevent future complaints as well as registering the information in the Internal Complaints Registry of the Company.

8. TRAINING

The Company's personnel receive training on complaints handling and particularly the responsible staff.

Complaint Form

Fill in the Complaint Form and submit it via email to. Please note that the Form must be completed accurately, completely and truthfully.

Client's Name	
Account Number	
Address	
Telephone Number(s)	
Email	
Description of the facts and the reasons of your complaint (evidence, the magnitude of loss and suggested way to be solved)	

Date: _____

Signature: _____

Please enclose any evidence and relevant documentation.

BILLMAR CAPITAL (PTY) LTD authorized and regulated by the Financial Sector Conduct Authority. (License number 471259)