

FSP Number: 50432

Complaints Management Framework

Reviewed and Approved by the Board of Directors:

Director	Signature	Date
J. Du Plessis		2026/10/12
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1. PURPOSE

According to the FAIS General Code of Conduct, financial services providers (FSPs) are required to establish, maintain and operate a complaints management framework to ensure that complaints are effectively resolved and complainants are treated fairly.

Treating Customers Fairly (TCF) Outcome 6 requires that clients do not face unreasonable barriers when requesting information, communicating with the business, updating instructions, lodging complaints or exercising their rights in terms of applicable agreements and regulatory requirements.

This Framework establishes the complaints management process to be followed by Graphite Asset Advisory (Pty) Ltd and provides guidance for the fair, transparent and effective management and resolution of complaints in accordance with legislative and regulatory requirements.

2. OBJECTIVES

The Complaints Management Framework sets out Graphite Asset Advisory (Pty) Ltd.'s approach to managing complaints in a manner that mitigates business and client risks while ensuring compliance with the Financial Advisory and Intermediary Services (FAIS) Act and its subordinate legislation.

Graphite Asset Advisory (Pty) Ltd is committed to maintaining an effective complaints management process that promotes fair client outcomes and supports its governance framework, regulatory obligations and client relationships.

The purpose of this Framework is to provide directors, key individuals, representatives and staff members with clear guidance on the recording, investigation, escalation, resolution and reporting of complaints. It establishes a consistent, fair and accountable approach to complaints handling, ensuring that all complaints are managed in accordance with applicable regulatory requirements and the principles of Treating Customers Fairly (TCF).

3. KEY DEFINITIONS

Annexure A provides a list of definitions related to Complaints Management as defined in the FAIS General Code of Conduct, updated on 26 June 2020.

4. COMPONENTS

Graphite Asset Advisory (Pty) Ltd is committed to rendering financial services with due skill, care and diligence, in the interests of its clients and in accordance with applicable regulatory requirements. While the business strives to maintain high standards of professionalism, transparency and service delivery, clients may from time to time wish to lodge a formal complaint. In such circumstances, Graphite Asset Advisory (Pty) Ltd will manage the complaint in accordance with this Complaints Management Framework. The FSP is committed to maintaining a transparent and accessible complaint resolution process that is fair to all parties involved. To achieve these outcomes, the FSP undertakes to:

- Openly disclose to clients the appropriate procedures for submitting a complaint, which will be readily available in writing
- Resolve client complaints in a practical and effective manner, with proper management of the resolution process

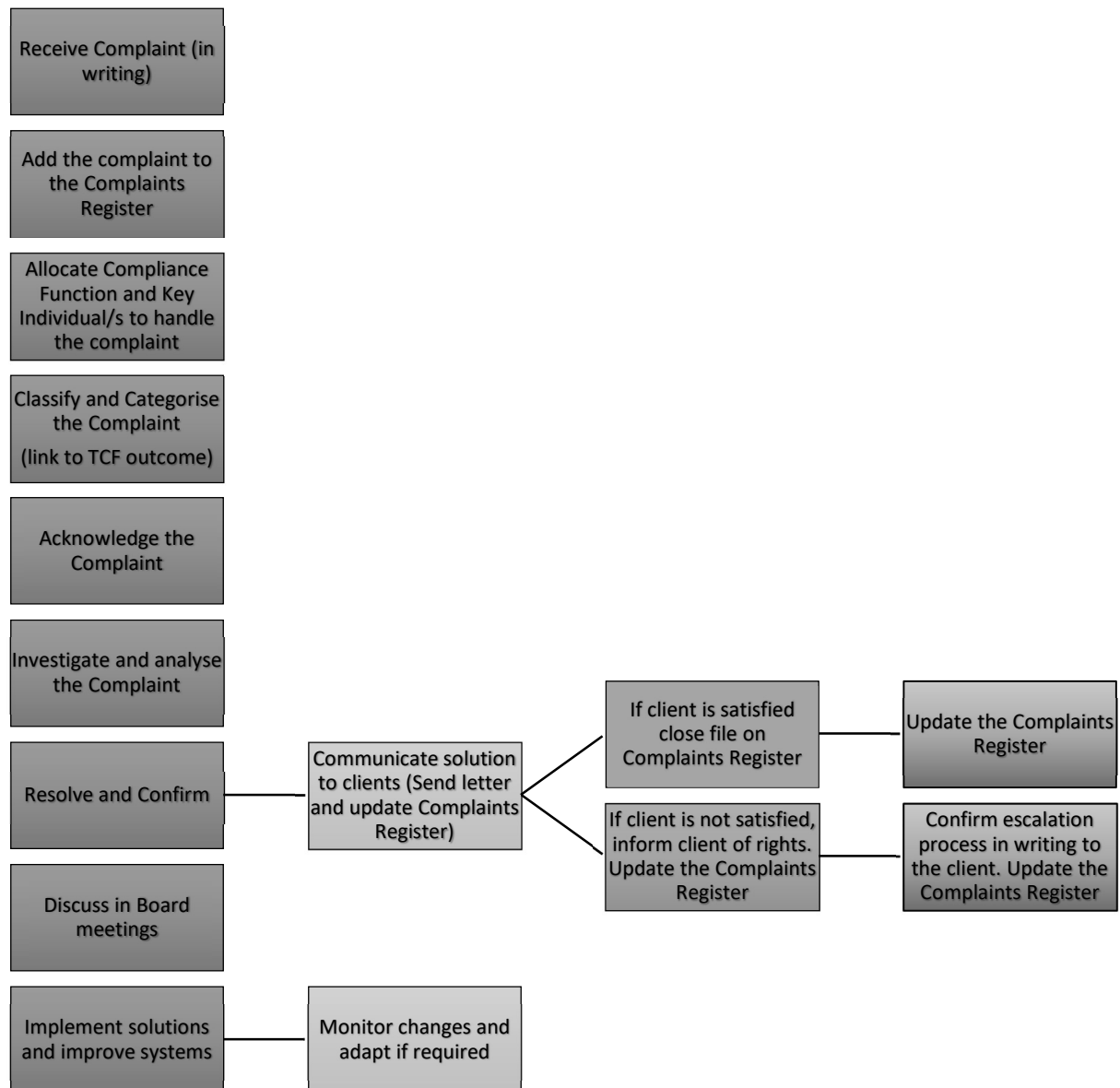
- Ensure that all relevant staff members are aware of the Complaints Management Framework and follow the documented complaints handling and escalation procedures.
- Respond to complaints promptly and fairly, giving careful attention to each one, and refraining from imposing obstacles that might obstruct the complainant's ability to voice their concerns.
- Investigate complaints fairly, objectively and within reasonable timeframes and, where appropriate, consider independent assistance or mediation to facilitate resolution.
- Offer appropriate redress to complainants without delay if the complaint is resolved in their favour
- Provide written reasons for its decision and inform the complainant of their rights to escalate the complaint to another forum if the complaint is not resolved in their favour
- Maintain a record of all complaints for a period of five years, including whether or not the complaint has been resolved
- Investigate and take appropriate action to prevent similar circumstances that gave rise to the complaint.
- Ensure that complainants do not face unreasonable barriers when lodging complaints, requesting information, communicating with the FSP or exercising their rights in terms of applicable agreements and regulatory requirements.

5. REVIEW

Graphite Asset Advisory (Pty) Ltd undertakes to conduct an annual review of its Complaints Management Framework and document any changes made to it. Additionally, the FSP will conduct a review whenever there are changes to the business that could impact the framework. The Internal Compliance function is responsible for reviewing and updating the Complaints Management Framework, which will then be approved by the Board of Directors.

A Review Register can be found in [Annexure B](#).

6. COMPLAINTS PROCESS OVERVIEW



7. ALLOCATION OF RESPONSIBILITIES

7.1 COMPLAINTS MANAGEMENT

The Board of Directors and Key Individuals of the FSP are responsible for the effective management of complaints and must approve and oversee the implementation of the FSP's complaints management framework to ensure its effectiveness.

Jacques Andre Du Plessis, in his capacity as Director and Key Individual, is ultimately responsible for the effective management of the complaints management process.

John Haslett, in his capacity as Director and Key Individual, will act as the designated stand-in person in the absence or unavailability of Jacques Andre Du Plessis. John Haslett will also assume responsibility for the management and oversight of any complaint made against Jacques Andre Du Plessis to ensure that such complaint is handled independently, objectively, and fairly.

Where a complaint relates to a Director or Key Individual, that individual will not participate in the investigation, decision-making, escalation or review of the complaint. The complaint will be allocated to another Director or Key Individual who is not involved in the subject matter of the complaint and is able to act independently and objectively. Where necessary, the Board may appoint another suitably qualified and impartial person to oversee or assist with the complaint.

7.2 DECISION MAKING

Individuals who are responsible for making decisions or recommendations regarding complaints, whether it is a specific complaint or in general, must be adequately trained, have the appropriate experience, knowledge, and skills related to complaints handling, fair treatment of customers, relevant legal and regulatory matters, and the subject matter of the complaint. Additionally, they must not be subject to any conflict of interest and be authorized to make impartial decisions or recommendations.

Jacques Andre Du Plessis, as a Director, has been assigned the responsibility of making decisions or recommendations in respect of complaints received by the FSP subject to the impartial allocation and exclusion provisions in section 7.1.

8. CATEGORISATION AND COMPLAINTS RESOLUTION PROCESS

The following categories will be used to categorise complaints:

Complaints relating to -

- Service Delivery
- Reporting and Communication
- Fees and Charges
- Administration and Operations
- Compliance and Regulatory Matters
- Conflict of Interest
- Complaints Handling
- Oversight, Governance Culture
- Mandates, Portfolio Structures
- Advisory, Research, Portfolio Construction
- Other

9. COMPLAINTS RESOLUTION PROCESS

Please refer to Annexure C for more information regarding the complaints resolution process, and point 8 for information regarding the categorisation.

10. REPRESENTATIVES AND SUPPLIERS

Any complaints received from representatives, service providers or suppliers will be recorded in the Complaints Register and managed in accordance with this Complaints Management Framework. Such complaints will be investigated, assessed and resolved using the same principles of fairness, transparency and consistency applied to client complaints.

11. DECISIONS RELATING TO COMPLAINTS

The FSP undertakes to ensure that:

- If a complaint is upheld, the FSP will fulfil any commitment to make compensation or goodwill payments, or take other actions without undue delay, and within agreed timeframes.
- If a complaint is rejected, the FSP will provide the complainant with clear and adequate reasons for the decision. The FSP will also inform the complainant of any applicable escalation or review processes, including how to use them, as well as any relevant time limits.

12. COMPLAINTS ESCALATING AND REVIEW PROCESS

The FSP will use the following process for the escalation and review of complaints:

12.1 If the complainant is not satisfied with the outcome of the complaint, the complaint may be escalated for review by the Board of Directors.

12.2. Jacques Andre Du Plessis is responsible for managing the escalation and review process of complaints. Where a complaint relates to Jacques Andre Du Plessis, John Haslett will assume responsibility for the escalation and review process. Where a complaint relates to any other Director or Key Individual, the complaint will be allocated to an impartial Director, Key Individual or other suitably qualified person who is not involved in the subject matter of the complaint.

12.3. Complaints may be escalated and/or reviewed in the following instances:

- Where the complaint is of a complex or unusual nature. In such an instance the initial complaint handler may escalate the complaint.
- Complainants may escalate complaints that were not resolved to their satisfaction (Complainants must be notified of this).

13. RECORD KEEPING, MONITORING AND ANALYSIS

The FSP is committed to ensuring the accurate, efficient, and secure recording of complaints and complaints-related information using the Complaints Register. To achieve this, the FSP will record all relevant details of the complainant and the subject matter of the complaint, including collecting copies of all relevant evidence, correspondence, and decisions, along with the complaint categorisation and progress/status updates, both within and outside set timelines.

Additionally, the FSP will maintain ongoing data on categorised reportable complaints, including the number of complaints received, upheld, rejected with reasons, escalated to the internal complaints escalation process, referred to an ombud, and compensation or goodwill payments made. The FSP will also keep a record of the total number of outstanding complaints.

The FSP will scrutinise and analyse the recorded complaints information/data regularly to manage conduct risks and implement improved outcomes and processes for clients in order to support continuous improvement and fair client outcomes.

Complainants may request a review of a complaint that was not resolved to their satisfaction. Complainants will be informed of the escalation and review process when the complaint outcome is communicated.

To ensure effective reporting of complaints information to the Board of Directors, the FSP will establish and maintain appropriate processes. The internal compliance function will assume responsibility for fulfilling the recordkeeping, monitoring, and analysis requirements.

The Internal Compliance Function will be responsible for all recordkeeping requirements. Jacques Andre Du Plessis, in his capacity as Director and Key Individual, will oversee the monitoring and analysis requirements.

The Internal Compliance Function will monitor complaints against the applicable timeframes set out in this Framework. Where a complaint exceeds an applicable timeframe, the reason for the delay and any revised resolution date will be documented in the Complaints Register. Overdue complaints will be escalated to the responsible Key Individual or, where appropriate, the Board.

14. COMMUNICATION WITH COMPLAINANTS

Graphite Asset Advisory (Pty) Ltd is committed to ensuring that its complaint processes and procedures are transparent, easily accessible, and free of charge for complainants. All communications with complainants will be conducted in plain language, and where possible, a single point of contact will be provided. The FSP will also disclose specific information to clients, such as the type of information required, where, how and to whom a complaint and related information must be submitted, expected turnaround times, and the complainant's responsibilities.

Upon receiving a complaint, Graphite Asset Advisory (Pty) Ltd will acknowledge receipt of the complaint in writing within one business day of receipt and promptly inform the complainant of the handling process, including contact details of the relevant personnel or department, indicative timeframes and details of the internal escalation and review process. The FSP will also provide details of the escalation of complaints to the relevant ombuds and the duties of the provider and the rights of the complainant as set out in the applicable rules.

Throughout the complaint handling process, Graphite Asset Advisory (Pty) Ltd will keep complainants adequately informed of the progress of their complaint, any causes of any delay in the finalisation of a complaint and revised timelines, and the final decision in response to the complaint.

15. ENGAGEMENT WITH OMBUD AND REPORTING

Where a complainant remains dissatisfied with the outcome of a complaint or the manner in which a complaint has been handled, the complainant may refer the complaint to the FAIS Ombud in accordance with the applicable legislative requirements and procedures.

Graphite Asset Advisory (Pty) Ltd will cooperate fully with the FAIS Ombud and will provide any information, documentation or assistance reasonably required in relation to the investigation or determination of a complaint.

Complainants will be informed of their right to refer complaints to the FAIS Ombud, together with the applicable referral requirements and contact details.

Contact Details of the FAIS Ombud

Postal Address:

FAIS Ombud
P.O. Box 74571
Lynwood Ridge
0040

Telephone:

012 762 5000 / 0860 663 247

Email:

info@faisombud.co.za

Website:

www.faisombud.co.za

Annexure A – DEFINITIONS

"client query" means a request to the provider or the provider's service supplier by or on behalf of a client, for information regarding the provider's financial products, financial services or related processes, or to carry out a transaction or action in relation to any such product or service;

"complainant" means a person who submits a complaint and includes a –

- a) client;
- b) person nominated as the person in respect of whom a product supplier should meet financial product benefits or that persons' successor in title;
- c) person whose life is insured under a financial product that is an insurance policy;
- d) person that pays a premium or an investment amount in respect of a financial product;
- e) member;
- f) person whose dissatisfaction relates to the approach, solicitation marketing or advertising material or an advertisement in respect of a financial product, financial service or related service of the provider,

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 in (a) to (f);

"complaint" means an expression of dissatisfaction by a person to a provider or, to the knowledge of the provider, to the provider's service supplier relating to a financial product or financial service provided or offered by that provider which indicates or alleges, regardless of whether such an expression of dissatisfaction is submitted together with or in relation to a client query, that -

- a) the provider or its service supplier has contravened or failed to comply with an agreement, a law, a rule, or a code of conduct which is binding on the provider or to which it subscribes;
- b) the provider or its service supplier's maladministration or wilful or negligent action or failure to act, has caused the person harm, prejudice, distress or substantial inconvenience; or
- c) the provider or its service supplier's has treated the person unfairly;

"compensation payment" means a payment, whether in monetary form or in the form of a benefit or service, by or on behalf of a provider to a complainant to compensate the complainant for a proven or estimated financial loss incurred as a result of the provider's contravention, non-compliance, action, failure to act, or unfair treatment forming the basis of the complaint, where the provider accepts liability for having caused the loss concerned, but excludes any -

- a) goodwill payment;
- b) payment contractually due to the complainant in terms of the financial product or financial service concerned; or
- c) refund of an amount paid by or on behalf of the complainant to the provider where such payment was not contractually due;

and includes any interest on late payment of any amount referred to in (b) or (c);

"goodwill payment" means a payment, whether in monetary form or in the form of a benefit or service, by or on behalf of a provider to a complainant as an expression of goodwill aimed at resolving a complaint, where the provider does not accept liability for any financial loss to the complainant as a result of the matter complained about;

"member" in relation to a complainant means a member of a -

- a) pension fund as defined in section 1(1) of the Pension Funds Act, 1956 (Act 52 of 1956);
- b) friendly society as defined in section 1(1) of the Friendly Societies Act, 1956 (Act 25 of 1956);
- c) medical scheme as defined in section 1(1) of the Medical Schemes Act, 1998 (Act 131 of 1998);
or
- d) group scheme as contemplated in the Policyholder Protection Rules made under section 62 of the Long-term Insurance Act, 1998, and section 55 of the Short-term Insurance Act, 1998;

"rejected" in relation to a complaint means that a complaint has not been upheld and the provider 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 the provider as unjustified or invalid, or where the complainant does not accept or respond to the providers proposals to resolve the complaint;

"reportable complaint" means any complaint other than a complaint that has been -

- a) upheld immediately by the person who initially received the complaint;
- b) upheld within the provider's ordinary processes for handling client queries in relation to the type of financial product or financial service complained about, provided that such process does not take more than five business days from the date the complaint is received; or
- c) submitted to or brought to the attention of the provider in such a manner that the provider does not have a reasonable opportunity to record such details of the complaint as may be prescribed in relation to reportable complaints; and

"upheld" means that a complaint has been finalised wholly or partially in favour of the complainant and that -

- a) the complainant has explicitly accepted that the matter is fully resolved; or
- b) it is reasonable for the provider to assume that the complainant has so accepted; and

all undertakings made by the provider to resolve the complaint have been met or the complainant has explicitly indicated its satisfaction with any arrangements to ensure such undertakings will be met by the provider within a time acceptable to the complainant.

Certain definitions contained in this Annexure originate from the FAIS General Code of Conduct and are included for regulatory completeness. Where references are made to financial products, insurance policies, premiums, pension fund members or similar product-specific terminology, such references should be interpreted in the context of the nature, scale and complexity of Graphite Asset Advisory (Pty) Ltd's business model and the financial services rendered by the business.

Annexure B – REVIEW REGISTER

[illegible]

Annexure C – COMPLAINTS RESOLUTION PROCESS

Process Step	Step Details
1. Lodge/Receive a Complaint	The complainant is required to submit the complaint in writing to Graphite Asset Advisory (Pty) Ltd. The complaint may be submitted by hand, post or email using the following details: • For attention: Jacques Du Plessis - Director and Key Individual • Email: compliance@graphiteadvisory.com • Physical/postal address: Suite 206D; Strauss Daly Building; 41 Richefond Circle; Ridgeside Office Park; Umhlanga Ridge; Durban; 4320 Where a complaint relates to Jacques Du Plessis, the complaint should be submitted directly to John Haslett at john@graphiteadvisory.com. Where a complaint relates to another Director or Key Individual, it will be allocated to an impartial person in accordance with sections 7.1 and 12 of this Framework. The person who is the subject of the complaint will not participate in its investigation, decision-making, escalation or review. If a complaint is submitted telephonically, the FSP will send the client an email requesting the relevant complaint details. The client must respond and provide the requested information in writing by hand, post or email. • The complainant must provide sufficient detail regarding the complaint, including: • Name of complainant or entity • Contact details • Client agreement reference (where applicable) • Complaint category: Service Delivery / Reporting and Communication / Fees and Charges / Administration and Operations / Compliance and Regulatory Matters / Conflict of Interest / Complaints Handling / Oversight, Governance Culture / Mandates, Portfolio Structures / Advisory, Research, Portfolio Construction / Other • Brief details of the complaint • Supporting documentation or evidence (where applicable)
2. Acknowledge	The FSP will: • Acknowledge receipt of the complaint in writing within one business day of receipt. • Clearly and transparently communicate the availability and contact details of the relevant Ombud services to complainants (clients) at all relevant stages of the relationship with a client, including at the start of the relationship and in relevant periodic communications. • Ensure all communication with a complainant is in plain language. • Provide, wherever feasible, complainants with a single point of contact for submitting complaints. • Promptly inform a complainant of the process to be followed in handling the complaint, including- ○ contact details of the person or department that will be handling the complaint; ○ indicative timelines for addressing the complaint; ○ details of the internal complaints escalation and review process if the complainant is not satisfied with the outcome of a complaint; ○ details of escalation of complaints to the office of a relevant Ombud and any applicable timeline; and ○ details of the duties of the provider and rights of the complainant as set out in the rules applicable to the relevant Ombud • Follow up telephonic acknowledgments with a written response either by SMS or email. • Despatch a complaint reference number to the complainant on the acknowledgment of the complaint. • Disclose to the client: ○ the type of information required from a complainant; ○ where, how, and to whom a complaint and related information must be submitted;

Process Step	Step Details
	○ expected turnaround times concerning complaints; and ○ any other relevant responsibilities of a complainant. • Despatch the details of the person allocated to the complaint to the complainant within 48 hours from receipt.
3. Allocate a Responsible person	The FSP will ensure that: • The complaint is allocated to an appropriate responsible person with the necessary authority, knowledge and experience to investigate and manage the complaint. • The responsible person will provide the complainant with their contact details and the complaint reference number. • The Internal Compliance Function will monitor the progress of complaints and maintain the Complaints Register. Jacques Andre Du Plessis, in his capacity as Director and Key Individual, (with involvement from other Key Individuals where appropriate) will provide oversight of complaints and complaint-related decisions where required
4. Classify	The FSP will: • Ensure that all complaints are assessed upon receipt to determine their nature, seriousness and potential impact; • Record all complaints in the Complaints Register and allocate a complaint reference number; • Assess whether escalation to the Internal Compliance Function, Jacques Andre Du Plessis, or the Board of Directors may be required; • Ensure that sufficient supporting documentation and information is obtained to facilitate the investigation of the complaint; • Where a third party acts on behalf of a complainant, obtain appropriate authority, consent or supporting documentation before disclosing confidential information relating to the complaint. Materiality Assessment: When classifying a complaint, the FSP will consider: • The nature and seriousness of the complaint; • The potential financial impact on the complainant or the business; • Any regulatory, legal or compliance implications; • Potential reputational impact; • Whether the complaint indicates a recurring issue or systemic weakness; and • Whether escalation may be required. Regulatory and Ombud Matters Complaints, enquiries or matters referred by the FAIS Ombud, FSCA or any other regulatory authority will be treated as high-priority matters. Such matters will be coordinated by Jacques Andre Du Plessis, with support from the Internal Compliance Function, and responded to within the applicable regulatory or prescribed timeframe.
5. Categorisation	The FSP will categorise reportable complaints according to the nature of the complaint and the area of the business to which the complaint relates. Complaints may be categorised as follows: • Service Delivery • Reporting and Communication to clients • Fees and Charges • Administration and Operations • Compliance and Regulatory Matters • Conflict of Interest • Complaints handling

Process Step	Step Details
	• Oversight, Governance Culture • Mandates, Portfolio Structures • Advisory, Research, Portfolio Construction • Other. The FSP will record, monitor and analyse complaint trends and categories in order to identify recurring issues, conduct risks and opportunities for process improvement. TCF Outcome Classification In addition to complaint categorisation, complaints may be linked to one or more Treating Customers Fairly (TCF) Outcomes: TCF Outcome 1 Complaints relating to governance, culture, oversight or conduct that may impact the fair treatment of clients. TCF Outcome 2 Complaints relating to agreed service arrangements, mandates, portfolio structures or operational processes. TCF Outcome 3 Complaints relating to inaccurate, unclear, misleading or delayed information, reporting, communication or disclosures. TCF Outcome 4 Complaints relating to investment management, consulting, advisory, research, portfolio construction or mandate implementation activities. TCF Outcome 5 Complaints relating to service delivery standards, reporting, operational support, communication or client relationship management. TCF Outcome 6 Complaints relating to complaints handling processes, responsiveness, escalation procedures or unreasonable barriers encountered by complainants.
6. Investigate	The FSP will: • Investigate complaints fairly and objectively, with the aim of resolving the complaint within five business days of receipt. Where the complaint cannot reasonably be finalised within this timeframe due to its nature, complexity or the need to obtain additional information, the complainant will be informed of the reason for the delay and provided with a revised expected resolution date; • Analyse the root cause of the complaint to determine the underlying cause and identify any corrective actions required to prevent recurrence; • Gather and assess all relevant information, evidence, correspondence and supporting documentation relating to the complaint; • Identify and verify relevant internal and external facts necessary to assess the complaint appropriately; • Escalate complaints, where necessary, in accordance with the escalation and review process set out in this Framework, within one business day of identifying the need for escalation; • Ensure that complaints are assessed in a balanced and impartial manner, taking into consideration the legitimate interests of all parties involved and the fair treatment of clients;

Process Step	Step Details
	• Ensure that complaint handling and escalation procedures are accessible and do not impose unreasonable barriers on complainants; • Document all material interactions, decisions and communications relating to the complaint; • Obtain appropriate consent before disclosing confidential information to third parties where required; and • Keep complainants appropriately informed regarding the progress of the investigation and any delays that may affect the finalisation of the complaint. Where a complaint identifies a recurring issue, control weakness, operational deficiency or conduct risk, appropriate corrective action will be considered and implemented where necessary.
7. Resolve and Confirm	The FSP will: • Ensure that the proposed resolution is fair, reasonable and consistent with the principles of Treating Customers Fairly (TCF); • Assess the proposed resolution to ensure that it appropriately addresses the complaint and its underlying root cause; • Review and approve the proposed resolution with the appropriate responsible person and, where necessary, Jacques Du Plessis or the Internal Compliance Function; • Communicate the proposed resolution to the complainant and provide an opportunity for clarification where required; • Document the outcome of the complaint, including any corrective actions, control enhancements or process improvements identified during the investigation; and • Ensure that any commitments made to the complainant are implemented within two business days of the resolution being agreed, unless an alternative timeframe has been agreed with the complainant.
8. Respond to Client	The FSP will: • Communicate the outcome of the complaint to the complainant in writing; • Clearly explain the findings of the investigation, the outcome reached and any actions proposed to resolve the complaint; • Where a complaint is upheld, ensure that any compensation payment, goodwill payment or other agreed corrective action is implemented without undue delay and within two business days of the resolution being agreed, unless an alternative timeframe has been agreed with the complainant; • Where a complaint is rejected, provide clear and adequate reasons for the decision; • Inform the complainant of any available escalation or review processes where the complainant remains dissatisfied with the outcome; and • Maintain a record of all communications, decisions and outcomes relating to the complaint in the Complaints Register. Where a complainant remains dissatisfied with the outcome of a complaint, the complainant will be advised of their right to refer the matter to the FAIS Ombud in accordance with the applicable legislative requirements and procedures.
9. Follow up and review	The FSP will: • Monitor the progress of all open complaints at least weekly to ensure that they remain within the applicable timeframes set out in this Framework and that any overdue matters are appropriately escalated; • Keep complainants appropriately informed regarding the progress of their complaint, including any delays, revised timelines or additional information requirements; • Conduct a follow-up review of the complaint outcome, where appropriate, to determine whether the complaint was resolved fairly and whether the proposed resolution was effectively implemented; • Consider any feedback received from the complainant regarding the complaint handling process and outcome; • Identify any recurring issues, operational weaknesses, conduct risks or process deficiencies arising from the complaint; and

Process Step	Step Details
	• Implement corrective actions, process improvements or additional controls where necessary to prevent recurrence.
10. Quality Assurance and Close	The FSP will: • Review complaint outcomes to ensure that complaints have been handled fairly, consistently and in accordance with the principles of Treating Customers Fairly (TCF); • Confirm that all agreed actions, corrective measures, compensation payments, goodwill payments or other commitments arising from the complaint have been implemented where applicable; • Ensure that the complaint investigation, outcome and supporting documentation have been appropriately recorded in the Complaints Register; • Review complaints periodically to identify complaint trends, recurring issues, conduct risks, operational weaknesses and opportunities for process improvement; • Consider whether any amendments to policies, procedures, controls or operational processes are required to prevent recurrence; • Ensure that complaints information is utilised to support improved client outcomes and the effective management of conduct risks; • Update the Complaints Register to reflect the final complaint outcome and closure status; and • Formally close the complaint once all actions arising from the complaint have been completed.

Annexure D – ACKNOWLEDGEMENT LETTER

Explanatory note:

The General Code of Conduct requires that an FSP must promptly acknowledge receipt of a complaint in writing with particulars of the staff involved in the resolution of the complaint.

This template letter should be pasted onto a letterhead with full details of the FSP. Keep a record or proof that the letter has been sent. The style and format may be changed according to the FSP's own style and individual requirements.

Dear Mr / Mrs [Name of Complainant]

COMPLAINT ACKNOWLEDGEMENT

We acknowledge receipt of your written complaint, received by us on [date].

Your complaint has been recorded under reference number [Complaint Reference Number] and will be investigated in accordance with our Complaints Management Framework.

The person responsible for managing your complaint is [Name], who may be contacted at [email address] and using the contact details provided.

We will investigate the matter and aim to resolve the complaint within five business days of receipt. Should the complaint require additional time due to its nature, complexity or the need to obtain additional information, we will keep you informed of the reason for the delay and provide you with a revised expected resolution date.

Graphite Asset Advisory (Pty) Ltd is committed to ensuring that complaints are managed fairly, consistently and transparently in accordance with applicable regulatory requirements and the principles of Treating Customers Fairly.

Thank you for bringing this matter to our attention.

Yours faithfully

Graphite Asset Advisory (Pty) Ltd

Annexure E – LETTER WHERE OUTCOME IS NOT IN FAVOUR OF COMPLAINANT

Explanatory note:

The General Code of Conduct requires that where the complaint cannot be resolved in favour of the client, the client must be informed in writing of the full reasons for not resolving the complaint. The client must be informed that he/she may refer the matter to the FAIS Ombud within 6 months of this notification. This template letter may be used for this purpose and should be pasted onto a letterhead with the date. Insert full details of the reasons why the complaint could not be settled as this letter will be considered by the Ombud if the matter is referred to him.

Dear [Complainant Name]

COMPLAINT OUTCOME – COMPLAINT NOT UPHOLD

We refer to your written complaint received on [Date].

Thank you for your patience whilst we conducted a thorough investigation into the matter.

Following a review of all relevant information, documentation and circumstances relating to the complaint, we regret to advise that we are unable to uphold the complaint.

Our decision is based on the following reasons:

- 1.*
- 2.*
- 3.*

Should you wish to request a review of this decision, details of the internal complaints escalation and review process are set out below:

[Insert escalation and review process details]

Should you remain dissatisfied with the outcome of the complaint, you may refer the matter to the FAIS Ombud in accordance with the applicable legislative requirements and procedures.

FAIS Ombud Contact Details

Postal Address:

FAIS Ombud

P.O. Box 74571

Lynwood Ridge

0040

Telephone:

012 762 5000 / 0860 663 247

Email:

[*info@faisombud.co.za*](mailto:info@faisombud.co.za)

Website:

[*www.faisombud.co.za*](http://www.faisombud.co.za)

Yours faithfully

Graphite Asset Advisory (Pty) Ltd

Annexure F – LETTER WHERE OUTCOME IS IN FAVOUR OF COMPLAINANT

Explanatory note:

The General Code of Conduct requires that where the complaint is resolved in favour of the client, the FSP must ensure that a full and appropriate redress is offered to the customer without any further delay.

This template letter may be used for this purpose and should be pasted onto a letterhead with the date. Insert full details of the settlement offer including the amount payable, whether any costs will be covered and the manner in which the amount will be settled.

It is suggested that if the offer is acceptable to the customer, he or she acknowledges in writing that the complaint has been resolved to his or her satisfaction.

Dear [Complainant Name]

COMPLAINT OUTCOME – COMPLAINT UPHELD

We refer to your written complaint received on [Date].

Thank you for your patience whilst we conducted a thorough investigation into the matter.

Following a review of all relevant information, documentation and circumstances relating to the complaint, we are pleased to advise that the complaint has been upheld.

Our decision is based on the following reasons:

- 1.*
- 2.*
- 3.*

To resolve the complaint, Graphite Asset Advisory (Pty) Ltd proposes the following:

- 1.*
- 2.*
- 3.*

Please confirm whether the proposed resolution is acceptable to you so that we may formally conclude the matter and update our records accordingly.

We appreciate the opportunity to address your concerns and apologise for any inconvenience caused.

Yours faithfully

Graphite Asset Advisory (Pty) Ltd

Annexure G – IMPORTANT CONTACT DETAILS

GRAPHITE ASSET ADVISORY (PTY) LTD - COMPLAINT SUBMISSION

For attention: Jacques Du Plessis - Director and Key Individual

Email: compliance@graphiteadvisory.com

Physical/postal address:

Suite 206D
Strauss Daly Building
41 Richefond Circle
Ridgeside Office Park
Umhlanga Ridge
Durban
4320

Alternative contact, including complaints relating to Jacques Du Plessis:

John Haslett - Director and Key Individual

Email: john@graphiteadvisory.com

FAIS Ombud

Postal Address	FAIS Ombud P.O. Box 74571 Lynwood Ridge 0040
Telephone	012 762 5000 / 0860 663 247
E-mail	info@faisombud.co.za
Website	www.faisombud.co.za

Audit Trail

2026-10-12 10:27:33 SAST	Status marked as complete.	
2026-10-12 10:27:28 SAST	jacques@graphiteadvisory.com (Jacques du Plessis) completed signing document	169.0.80.47
2026-10-12 10:27:21 SAST	jacques@graphiteadvisory.com (Jacques du Plessis) accepted QuicklySign Terms and Conditions	169.0.80.47
2026-10-12 10:27:14 SAST	jacques@graphiteadvisory.com (Jacques du Plessis) opened document	169.0.80.47
2026-10-12 10:27:14 SAST	jacques@graphiteadvisory.com (Jacques du Plessis) clicked document link	169.0.80.47
2026-10-12 10:27:13 SAST	jacques@graphiteadvisory.com (Jacques du Plessis) opened document	104.47.19.254
2026-10-12 10:27:13 SAST	jacques@graphiteadvisory.com (Jacques du Plessis) clicked document link	104.47.19.254
2026-10-12 09:16:03 SAST	janeke@ukrwm.co.uk (Janeke Vermeulen) completed signing document	77.99.129.184
2026-10-12 09:15:56 SAST	janeke@ukrwm.co.uk (Janeke Vermeulen) accepted QuicklySign Terms and Conditions	77.99.129.184
2026-10-12 09:15:45 SAST	janeke@ukrwm.co.uk (Janeke Vermeulen) opened document	77.99.129.184
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2026-10-12 09:15:44 SAST	janeke@ukrwm.co.uk (Janeke Vermeulen) opened document	77.99.129.184
2026-10-12 09:15:44 SAST	janeke@ukrwm.co.uk (Janeke Vermeulen) clicked document link	77.99.129.184
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2026-10-12 09:15:44 SAST	janeke@ukrwm.co.uk (Janeke Vermeulen) clicked document link	77.99.129.184
2026-10-12 09:15:43 SAST	janeke@ukrwm.co.uk (Janeke Vermeulen) opened document	52.102.18.5
2026-10-12 09:15:43 SAST	janeke@ukrwm.co.uk (Janeke Vermeulen) clicked document link	52.102.18.5
2026-10-12 08:22:26 SAST	bradley@rwm.co.za (Bradley Marais) completed signing document	41.193.126.83
2026-10-12 08:22:18 SAST	bradley@rwm.co.za (Bradley Marais) accepted QuicklySign Terms and Conditions	41.193.126.83
2026-10-12 08:22:12 SAST	bradley@rwm.co.za (Bradley Marais) opened document	41.193.126.83
2026-10-12 08:22:12 SAST	bradley@rwm.co.za (Bradley Marais) clicked document link	41.193.126.83
2026-10-12 08:22:09 SAST	bradley@rwm.co.za (Bradley Marais) opened document	52.102.18.21

2026-10-12 08:22:08 SAST	bradley@rwm.co.za (Bradley Marais) clicked document link	52.102.18.21
2026-10-11 21:14:51 SAST	john@graphiteadvisory.com (John Haslett) completed signing document	203.211.104.233
2026-10-11 21:14:38 SAST	john@graphiteadvisory.com (John Haslett) accepted QuicklySign Terms and Conditions	203.211.104.233
2026-10-11 21:14:30 SAST	john@graphiteadvisory.com (John Haslett) opened document	203.211.104.233
2026-10-11 21:14:30 SAST	john@graphiteadvisory.com (John Haslett) clicked document link	203.211.104.233
2026-10-11 21:14:28 SAST	john@graphiteadvisory.com (John Haslett) opened document	104.47.19.254
2026-10-11 21:14:28 SAST	john@graphiteadvisory.com (John Haslett) clicked document link	104.47.19.254
2026-10-11 18:19:02 SAST	Email has been received by bradley@rwm.co.za mail server	149.72.149.168
2026-10-11 18:19:02 SAST	Email has been received by john@graphiteadvisory.com mail server	149.72.149.195
2026-10-11 18:19:01 SAST	Email has been received by janeke@ukrwm.co.uk mail server	149.72.149.168
2026-10-11 18:19:00 SAST	Email has been received by jacques@graphiteadvisory.com mail server	149.72.149.195
2026-10-11 18:18:59 SAST	Signature request sent to: bradley@rwm.co.za (Bradley Marais)	
2026-10-11 18:18:58 SAST	Signature request sent to: janeke@ukrwm.co.uk (Janeke Vermeulen)	
2026-10-11 18:18:57 SAST	Signature request sent to: john@graphiteadvisory.com (John Haslett)	
2026-10-11 18:18:56 SAST	Signature request sent to: jacques@graphiteadvisory.com (Jacques du Plessis)	
2026-10-11 18:18:48 SAST	Kerusha Shanmugam changed the status to:awaiting_signatures	41.157.144.190
2026-10-11 18:14:58 SAST	kerusha@graphiteadvisory.com (Kerusha Shanmugam) uploaded document	41.157.144.190

Signers

Jacques du Plessis

Email: jacques@graphiteadvisory.com

Role: signer-1

Mobile Number: +27836506406

User Identification: mobile



Date completed: 2026-10-12 10:27:24 SAST

John Haslett

Email: john@graphiteadvisory.com

Role: signer-2

Mobile Number: +27662673286

User Identification: mobile



Date completed: 2026-10-11 21:14:42 SAST

Janeke Vermeulen

Email: janeke@ukrwm.co.uk

Role: signer-3

Mobile Number: +447949725304

User Identification: mobile



Date completed: 2026-10-12 09:15:59 SAST

Bradley Marais

Email: bradley@rwm.co.za

Role: signer-4

Mobile Number: +27725076754

User Identification: mobile

Bradley Marais

Date completed: 2026-10-12 08:22:22 SAST

Supporting documentation

Supporting documents that were uploaded, as part of the signing process, can be found on the document page online.

Online verification

This document can be verified online here

https://financial.quicklysign.com/verify_document/Sd1mLRNNaNcGmV1a12bbee573_yHYaSCVkiBsL83