

360 Capital Ltd
(the "Company")

COMPLAINTS MANAGEMENT AND RESOLUTION POLICY AND PROCEDURE

Approved by the Board on 11 February 2021

1. SCOPE

- 1.1. The Securities Act 2005 (the "Act") and the rules and regulations made thereunder require financial service providers to maintain an internal complaints resolution system and procedures based on the following:
 - 1.1.1. maintenance of a comprehensive complaints policy outlining the Company's commitment to, and system and procedures for, internal resolution of complaints;
 - 1.1.2. transparency and visibility: ensuring that clients have full knowledge of the procedures for resolution of their complaints;
 - 1.1.3. accessibility of facilities: ensuring the existence of easy access to such procedures at any office or branch of the provider open to clients, or through ancillary postal, fax, telephone or electronic helpdesk support;
 - 1.1.4. classification and analysis of complaints and corrective actions implemented;
 - 1.1.5. fairness: ensuring that a resolution of a complaint can during and by means of the resolution process be effected which is fair to both clients and the provider and its staff;
- 1.2. This Complaints Management and Resolution Policy and Procedure (the "**Policy**") will be adopted by the Company's Key Individual(s), who has/have resolved that the management, representatives and employees of the Company shall comply with and implement the provisions of this Policy and pledge their cooperation and commitment by signature thereof.

2. PURPOSE

The purpose of this Policy is to document this complaints resolution system and procedures, and to assist staff with effectively facilitate complaints management and following the correct procedures when a complaint is received.

3. BACKGROUND

3.1. Types of complaints

3.1.1. Complaints specifically relate to a financial service rendered by a financial services provider or representative, and in which complaint it is alleged that the provider or representative:

3.1.1.1. has contravened or failed to comply with a provision of the Act and that as a result thereof the complainant has suffered or is likely to suffer financial prejudice or damage;

3.1.1.2. has wilfully or negligently rendered a financial service to the complainant which has caused prejudice or damage to the complainant or which is likely to result in such prejudice or damage; or

3.1.1.3. has treated the complainant unfairly.

3.1.2. The Company is committed not only to delivering a high standard of service to its clients, but also to fully embedding the Treating Customers Fairly principles within the organization. To this end the Company has decided that routine complaints by clients need to be recorded and tracked for quality control purposes. The following are examples of routine complaints:

3.1.2.1. failure to or lack of proper and regular follow-up with product providers regarding instructions submitted;

3.1.2.2. failure to perform client instructions;

3.1.2.3. delay in turnaround times for processing of client instructions;

3.1.2.4. a lack of or poor feedback to client regarding the processing of instructions; and

3.1.2.5. poor attitude of servicing staff.

4. Policy Statement

360 Capital Ltd is dedicated to ensuring that all complaints received are resolved as quickly as possible in a fair and equitable manner. The Company will be maintaining a complaint resolution system and procedure based on the following principles:

- 4.1. the Company shall maintain a comprehensive complaints policy that outlines its commitment to, and system and procedures for internal resolution of complaints;
- 4.2. the Company shall be transparent in its dealings with clients to ensure that at all times clients have full knowledge of the procedures for resolution of their complaints;
- 4.3. the Company shall ensure its facilities as accessible accessibility of facilities, ensuring the existence of easy access to such procedures at the office provider open to clients, or through ancillary postal, fax, telephone or electronic helpdesk support; and
- 4.4. the Company shall exercise fairness in its dealings with clients to ensure that all complaints are resolved in a procedurally fair and equitable manner for all parties involved.

5. Serious Complaints

5.1. How to lodge a serious complaint

5.1.1. Any client who feels that he/she has been prejudiced in any way by the Company or its staff and who wishes to lodge a complaint as defined in clause 3.1.1, above, against the Company **must do so in writing as well as provide full details accompanied by supporting documentation.**

5.1.2. Please lodge your complaint in writing to our Compliance Officer on:

Attention: Mrs Aroona D. Lutchmun

Email: info@finsburey.com

Telephone: (230) 4667001

Post Address: 6th Floor, The Core, 62 ICT Avenue, Cybercity Ebene, Mauritius

5.2. The complaint should contain sufficient details including:

5.2.1. the client details and the Policy, account or member numbers that relate to the complaint;

- 5.2.2. specific details about the nature of the complaint e.g. facts, dates and supporting documentation (i.e. letters, quotations, previous correspondence etc.) to enable us to deal with the complaint quickly and fairly;
- 5.2.3. proof of any losses sustained;
- 5.2.4. the solution / remedial action you believe is required to resolve the complaint.

5.3. **Complaints resolution: Serious Complaints**

Once a written complaint is received from a client we will act as follows:

- 5.3.1. We will acknowledge receipt of the complaint in writing within 10 (ten) days of after receiving the complaint.
- 5.3.2. We will notify our professional indemnity cover provider.
- 5.3.3. We will also investigate the complaint to ascertain whether the complaint can be resolved immediately.
- 5.3.4. If the complaint can be resolved immediately, we will take the necessary action and advise accordingly.
- 5.3.5. If the complaint cannot be resolved immediately we will send you a written summary of the steps to be taken to resolve the matter and the expected date of resolution.
- 5.3.6. The complaint will be investigated and we will revert with our findings, the reasons for our findings and our proposed solution of the complaint within 3 (three) working days.
- 5.3.7. In the event that you are not satisfied with our solution, you may refer the complaint to Mr. Paul Venter of 360 Capital Ltd who may amend the solution or confirm it.
- 5.3.8. After the complaint has been referred to Mr. Paul Venter and you are still not satisfied with the outcome, we will regard the complaint as being unsatisfactorily resolved. You may under such circumstances take such other steps as may be advised by your legal representatives.

5.3.9. We will update the complaints register accordingly.

5.4. Procedures

5.4.1. If the complaint is not in writing, sufficient information will be obtained verbally from the client to be submitted on the client's behalf. We will revert in writing for them to confirm the contents of the complaint lodged verbally.

5.4.2. Complainants must report the complaint to the Compliance Officer / Accountant / Key Individual within the Company and they must immediately:

5.4.2.1. acknowledge receipt of the complaint

5.4.2.2. determine if the complaint can be resolved immediately

5.4.2.3. capture the complaint in the Complaints Register

5.4.3. Thereafter the Compliance Officer / Accountant / Key Individual will:

5.4.3.1. investigate the complaint further;

5.4.3.2. resolve the complaint immediately or take the necessary action and advise the client of steps taken and expected date of resolution;

5.4.3.3. revert within 3 working days; and

5.4.3.4. update the complaints register with all developments / activities

5.4.4. After 3 weeks the client will be informed in writing of the resolution of the complaint and the outcome, or of the progress if the complaint require further investigation.

5.4.5. The client must be notified of the final outcome by no later than 6 weeks since the complaint was received.

6. Routine Complaints

6.1. How to Lodge a Routine Complaint

6.2. When a client contacts the office of the Company telephonically or calls at the premises wishing to complain about any matter that is listed in clause 3.1.2 of this Policy or similar matter, such client must be referred or directed to the Routine Complaints Officer.

6.3. Resolution of Routine Complaints

Upon receipt of a routine complaint, the officer will deal with the complaint as follows:

- 6.3.1. listen carefully to the complaint by the client;
- 6.3.2. empathize with the client (where appropriate);
- 6.3.3. judge whether the complaint has merit;
- 6.3.4. if so, offer an apology to the client;
- 6.3.5. if not, ensure that any misunderstanding that might exist is removed by explaining material issues to the client for instance where the complaint has arisen as a result of circumstances beyond the administrator's control;
- 6.3.6. record the complaint in the routine complaints register;
- 6.3.7. review procedures that have given rise to the complaint in conjunction with the relevant lines of supervision and ensure that processes are improved as far as possible to prevent similar occurrences in future.

7. Record keeping

We will keep a record of all correspondences relating to the complaint and maintain a full record of each complaint received for a period of 7 (seven) years as prescribed by relevant legislation.