

# Complaint Policy

## More Than Trading

PU Prime Ltd.

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**Email:** [info@puprime.com](mailto:info@puprime.com)

**Web:** [www.puprime.com](http://www.puprime.com)

**Address:** 37 Harley Street, Ferndale, Randburg, Gauteng, South Africa

**INTRODUCTION**

PU Prime Ltd. (“the Company”, “us”, “our” or “We”) is an international business company registered in Saint Lucia under registration number: 2023-00064.

This policy is intended to guide clients and staff about the Company's complaints management process. To ensure that our clients are treated fairly, and that our complaints management procedure is effective, efficient, transparent and accessible, any client who lodges a complaint shall be provided with a written copy of this policy and details of the procedure which we follow when a complaint is received.

**SCOPE**

This policy covers all individuals working at all levels and grades, including managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term employees, casual staff and volunteers (collectively referred to as staff or employees). All staff are responsible for their own compliance with this policy and for ensuring that it is consistently applied. All staff should ensure that they take the time to read and understand their roles and responsibilities in respect of it. Breach of this policy will be dealt with under our Disciplinary Procedure and may be treated as gross misconduct which could result in dismissal.

**REVIEW OF THIS POLICY**

The policy shall be reviewed annually to ensure that it meets the legal requirements as per applicable regulations and reflects best market practice.

**DEFINITIONS**

**‘Client’** means any person (natural or legal person) of whom the Company provides investment and/or ancillary services to.

**‘Complaint’** means a statement of dissatisfaction by a client (natural or legal person) regarding the provision of investment and/or ancillary services provided by the Company.

**‘Complainant’** means a client (natural or legal person) who is presumed to be eligible to have a complaint considered by the Company and who has already filled a complaint.

The Company reserves the right to categorize and classify a notice received by a client as an enquiry rather than a complaint if such notice does not fall within the definition of **‘Complaint’** above which will be forwarded to the relevant department accordingly. The Client reserves the right to request for the re-classification of the enquiry as a complaint provided that reasonable grounds are presented to the Company.

## **OUR COMMITMENT**

- The Complaints Policy will be made available to the client on request.
- We are committed to resolve any complaint timeously and fairly.
- All relevant staff will be provided sufficient training pertaining to complaints handling as per applicable regulations.
- Records of all complaints will be kept for a minimum period of 5 years.

### *Obligations of our Representatives*

- Our Representatives must adhere to our internal procedures, as well as the requirements of the applicable regulations at all times; and
- Our Representatives must ensure that all complaints received are forwarded to our complaints officer immediately.

## **PROCEDURE WHEN SUBMITTING A COMPLAINT**

All complaints must be in writing and can be sent by email to: [trading@puprime.net](mailto:trading@puprime.net)

The following information must be provided in order for us to assist:

- Your name, surname and contact details;

- A complete description of your complaint including details of the person, area or institution;
- Details of when and where the transaction took place;
- The name of the person who provided you with the financial service;
- All documentation relating to your complaint; and
- Method of preferred communication.

#### *Procedure when we have received your complaint*

When we receive your complaint, we will:

- Acknowledge receipt, in writing, within 48 hours and add your complaint to our internal complaints register.
- Your complaint will be allocated to an appropriate person for further investigation. This will not be the person of whom the complaint is lodged against.
- We may ask for additional information if needed.
- We will investigate, attempt to resolve and respond within 21 days from the date of receiving your complaint, or after receiving any additional information we require.
- If we require more time to investigate the complaint, it will be communicated to you in writing.
- We will let you have our response in writing with full reasons. Please note that certain decisions may have to be approved by the governing authority of the organisation. In such a case, we will communicate that fact to you, as well as the date on which a decision will be taken.
- In case a complaint is unsolved or you are not satisfied with our response, the complaint may be pursued with any ombuds who has jurisdiction, within a six (6) month period from the date the Company's final decision has been received. Alternatively, you may approach your own legal counsel.

In the event of us not reverting to you within the time periods indicated above, kindly contact our Compliance officer for an explanation as to why we have not yet communicated with you. Please do not accept any communication from any person until it has been confirmed in writing.

**COMPLAINTS REGISTER**

| Received | Date | From | Product | Client Number | Client Name & Surname | Complaint Description | Captured by | Responsible Person | Activity update | Outcome | Date Comm to Client | Learning |
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