Complaints Management Framework (CMF)
(Super Money SA Pty Limited)

Version 1

February 2026

Super Money SA (Pty) Limited
1 Waterview Close
Century City
Cape Town
South Africa

Co Reg No.: 2022/614959/07

Super Money SA (Pty) Ltd. Part of Super group

Table of Contents

1. DOCUMENT ADMINISTRATION

Policy Details	
Document Owner	Compliance
Document Level	Framework
Level of Approval	Board of Directors
Frequency of Review	Annually or if any material legislative or operational changes occur

Revision Date	Document Version	Summary of Changes	Author
February 2026	V1	Creation of Document	Compliance

This Policy has been approved as follows:

Position/Structure	Document Version	Signature and Date of Approval
Licensed Entity Board Director	V1	Anthony Prissman (Feb 25, 2026 20:03:48 GMT+2)

2. INTRODUCTION

Super Money SA (Pty) Ltd ("Super Money") is committed to maintaining an effective, transparent, and fair Complaints Management Framework that supports the fair treatment of customers, promotes confidence in the organisation, and ensures that complaints are handled consistently, objectively, and timeously.

This Framework gives effect to Treating Customers Fairly (TCF) Outcome 6, which requires that customers do not face unreasonable post-sale barriers when submitting complaints or seeking redress.

3. PURPOSE OF THE FRAMEWORK

The purpose of this Complaints Management Framework ("the Framework") is to:

- Establish a structured and consistent approach to complaint handling.
- Ensure complaints are addressed fairly, impartially, and within reasonable timeframes.
- Identify and remediate the root causes of complaints.
- Enable effective oversight, reporting, and governance of complaints; and
- Ensure alignment with applicable regulatory, contractual, and internal governance requirements.

4. SCOPE OF APPLICATION

This Framework applies to:

- All complaints received from customers or potential customers.
- All products, services, systems, and customer touchpoints operated by Super Money; and
- All directors, executives, employees, contractors, and representatives of Super Money.

5. DEFINITION OF A COMPLAINT

A **complaint** is an expression of dissatisfaction made to Super Money by or on behalf of a customer, relating to:

- A product or service provided by Super Money.
- The way Super Money has treated the customer; or
- An alleged failure by Super Money to comply with regulatory, contractual, or internal obligations.
  This definition is aligned with the FAIS General Code of Conduct approach reflected in the Customer Complaints Policy.

6. REGULATORY AND GOVERNANCE FRAMEWORK

This Framework is informed by and aligned to:

- Treating Customers Fairly (TCF) principles.
- Applicable financial services, consumer protection, and gambling regulatory requirements.
- Super Money's internal governance documents, including:
  - Customer Complaints Policy

- Risk Management and Compliance Programme (RMCP)
- Conflict of Interest Policy; and
- Industry complaints management standards reflected in Complaints Process

7. COMPONENTS OF THE COMPLAINTS MANAGEMENT FRAMEWORK

The Complaints Management Framework consists of the following components:

- Complaints Process Policy – sets out principles and minimum standards.
- Complaints Handling Procedures – operational step-by-step processes.
- Complaints Register – record of all complaints and outcomes.
- Governance, Oversight, and Reporting Mechanisms.
- Monitoring, Analysis, and Root Cause Remediation.

Together, these components will ensure effective and consistent complaint handling across Super Money.

8. COMPLAINTS HANDLING PRINCIPLES

Super Money's complaints handling is guided by the following principles:

- Accessibility – complaints can be lodged easily and at no cost.
- Fairness and Objectivity – complaints are assessed impartially.
- Transparency – customers are informed of processes and outcomes.
- Timeliness – complaints are handled within reasonable timeframes.
- Confidentiality – information is handled securely and appropriately; and
- No Retaliation – customers are not disadvantaged for lodging complaints.

9. COMPLAINTS HANDLING PROCESS (HIGH-LEVEL)

The detailed steps are contained in the Complaints Process Policy and procedures. At a framework level, the process includes:

1. Receipt and logging of the complaint
2. Acknowledgement to the complainant
3. Assessment and investigation
4. Response and resolution
5. Escalation where required
6. External referral rights were unresolved

10. ROLES AND RESPONSIBILITIES

All Employees and Representatives of Super Money will:

- Identify, record, and escalate complaints.
- Treat complainants fairly and professionally.

The Compliance Function of Super Money will:

- Provide oversight of complaint handling.
- Ensure compliance with this Framework.
- Monitor trends and systemic risks; and
- Support regulatory engagement where required.

The Senior Management Team of Super Money will:

- Oversee the effectiveness of the Framework.
- Review complaints data and trends; and
- Ensure adequate resources are allocated.

The Board of Directors for Super Money will:

- Approve the Framework.
- Receive periodic complaints reporting; and
- Oversee material customer conduct risks.

11. COMPLAINTS REGISTER AND RECORDKEEPING

Super Money maintains a Complaints Register that records:

- Complaint reference number.
- Date received.
- Nature and category of complaint.
- Actions taken and outcome.
- Resolution date; and
- Escalation or regulatory referral, where applicable.
  Records are retained in accordance with Super Money's recordkeeping obligations, consistent with the governance approach referenced in the Policy.

12. MONITORING, ANALYSIS, AND ROOT CAUSE IDENTIFICATION

Super Money analyses complaints data to:

- Identify trends and recurring issues.
- Detect potential systemic or conduct risks.
- Assess the effectiveness of controls; and
- Implement corrective and preventative actions.

Root cause analysis forms a core part of continuous improvement under this Framework.

13. MANAGEMENT INFORMATION AND REPORTING

Complaints-related management information includes:

- Volume and categories of complaints.
- Resolution timeframes.
- Escalated and unresolved complaints; and
- Root cause and remediation actions.

This information is reported to senior management on a regular basis to support oversight and governance, consistent with the approach in **Customer Complaints Process.**

14. TRAINING AND AWARENESS

Super Money ensures that relevant employees receive training on:

- Complaints handling obligations.
- TCF Outcome 6.
- Escalation procedures; and
- Fair and professional customer engagement.

15. CONTINUOUS IMPROVEMENT

Super Money uses complaints outcomes to:

- Improve products, services, and processes.
- Enhance customer experience; and
- Strengthen its overall conduct risk framework.

16. REVIEW OF THE FRAMEWORK

This Complaints Management Framework is reviewed at least annually, or earlier if required due to regulatory changes, operational changes, or identified deficiencies. Changes are documented and approved in line with governance requirements, consistent with the review expectations outlined above.

17. APPROVAL AND EFFECTIVE DATE

This Complaints Management Framework is approved by the Board of Super Money SA (Pty) Ltd and is effective from the date of approval.