Complaints Management Policy

MINT PLATFORMS (PTY) LTD

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MINT PLATFORMS (PTY) LTD

Complaints Management Policy

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1. **PURPOSE AND OBJECTIVE**

1.1. The purpose of this Complaints Management Policy ("**Policy**") is to establish a clear, transparent, fair, and effective framework for the receipt, handling, investigation, resolution, escalation, and reporting of complaints directed at MINT Platforms (Pty) Ltd (Registration Number 2024/644796/07) ("**MINT**"), its products, services, platforms, personnel, outsourcing partners, and representatives.

1.2. This Policy gives effect to MINT's obligations under the Financial Advisory and Intermediary Services Act 37 of 2002 ("**FAIS Act**") and the General Code of Conduct for Authorised Financial Services Providers and Representatives ("**FAIS Code**"), the Financial Sector Regulation Act 9 of 2017 ("**FSR Act**"), the Consumer Protection Act 68 of 2008 ("**CPA**"), and accepted principles of corporate governance, including the recommendations of the King IV Report on Corporate Governance for South Africa 2016.

1.3. This Policy is designed to:

1.3.1. promote a culture of accountability, responsiveness, and continuous improvement across MINT's operations;

1.3.2. ensure that complaints are handled lawfully, fairly, timeously, and consistently, and that complainants are treated with respect and dignity throughout the complaints process;

1.3.3. protect the rights and legitimate interests of complainants and of MINT;

1.3.4. comply with all applicable South African legal and regulatory requirements governing the handling of financial services complaints;

1.3.5. mitigate MINT's legal, regulatory, reputational, operational, and technology risks arising from complaints; and

1.3.6. ensure that complaints data is used as a source of risk intelligence to drive continuous improvement in MINT's products, services, systems, and governance arrangements.

2. SCOPE OF APPLICATION

2.1. This Policy applies to all complaints received from clients, customers, users, counterparties, suppliers, service providers, employees, contractors, regulators, and other stakeholders, whether those complaints relate to MINT's conduct before, during, or after the provision of any financial or other service.

2.2. This Policy binds all MINT business units, subsidiaries, affiliates, directors, officers, employees, consultants, contractors, and agents, including all persons involved in or responsible for the receipt, handling, investigation, escalation, or oversight of complaints.

2.3. This Policy applies to complaints relating to MINT's technology platforms, algorithms, data processing activities, commercial arrangements, billing, service delivery, conduct, compliance matters, and any other aspect of MINT's business in respect of which a stakeholder has a legitimate interest in raising a concern.

2.4. Where a complaint relates wholly or partially to the conduct, performance, or omission of a third-party service provider or outsourcing partner engaged by MINT, MINT will not decline to investigate or resolve the complaint on the basis that the conduct is attributable to a third party. MINT manages the complaint in accordance with this Policy as if the conduct were MINT's own, except where the third party's independent contractual relationship with the complainant requires a different approach. Where investigation requires information from a third party, MINT will exercise its contractual rights to obtain that information.

3. DEFINITIONS

3.1. For purposes of this Policy, the following terms bear the meanings assigned to them:

3.1.1. "**Complaint**" means any expression of dissatisfaction, concern, grievance, or allegation, whether justified or not, relating to MINT's conduct, products, services, systems, decisions, or personnel, where a response or resolution is explicitly or implicitly expected. The expression of dissatisfaction need not be formal or in writing to qualify as a complaint;

3.1.2. "**Complainant**" means any person or entity who submits a complaint, whether or not that person is a client or customer of MINT;

3.1.3. "**FAIS Complaint**" means a complaint as defined in the FAIS Act or the FAIS Code, relating to financial advice or intermediary services rendered by MINT as an authorised FSP, and which is subject to the specific complaints handling obligations imposed by the FAIS Code;

3.1.4. "**Material Complaint**" means a complaint that:

3.1.4.1. alleges unlawful, unethical, fraudulent, discriminatory, or materially negligent conduct;

3.1.4.2. involves potential regulatory non-compliance or systemic risk;

3.1.4.3. exposes MINT to potential litigation, regulatory sanction, or material reputational harm; or

3.1.4.4. involves significant financial exposure or data protection concerns;

3.1.5. "**Standard Complaint**" means a complaint requiring substantive investigation and resolution that does not meet the threshold for a Material Complaint;

3.1.6. "**Low-Risk Operational Complaint**" means a routine or isolated complaint with limited impact and no material legal, regulatory, or reputational risk; and

3.1.7. "**Working Day**" means any day other than a Saturday, Sunday, or public holiday in the Republic of South Africa.

4. GUIDING PRINCIPLES

4.1. All complaints must be handled in accordance with the following principles, which reflect MINT's obligations under the FAIS Code, the CPA, and the FSR Act:

4.1.1. Accessibility: complaint channels must be visible, easy to use, and available without unreasonable barriers. MINT must ensure that complaint channels are clearly communicated to all stakeholders and that access is not conditioned on formality or cost.

4.1.2. Fairness and Impartiality: complaints must be assessed objectively, without bias or conflict of interest. The investigator must have no actual or perceived conflict of interest in relation to the subject matter of the complaint.

4.1.3. Confidentiality: information relating to complaints must be handled sensitively and disclosed strictly on a need-to-know basis, consistent with MINT's data protection obligations under POPIA and the FAIS Code.

4.1.4. Transparency: complainants must be informed of the process, expected timeframes, and outcome, subject to applicable legal constraints including legal privilege and confidentiality obligations.

4.1.5. Timeliness: complaints must be acknowledged, investigated, and resolved within the defined timeframes set out in this Policy, and complainants must be kept informed of progress where investigations extend beyond the standard timeframes.

4.1.6. Proportionality: the level of investigation and the resources applied to a complaint must be proportionate to the nature, complexity, and risk profile of the complaint.

4.1.7. Non-Retaliation: no person may be subjected to retaliation, adverse treatment, or discrimination for lodging a complaint in good faith. Any person who subjects a complainant to retaliation is subject to disciplinary action by MINT.

4.1.8. Regulatory Compliance: all complaints handling must comply with applicable legislation and regulatory requirements, including the FAIS Code, the FSR Act, the CPA, and the Protection of Personal Information Act 4 of 2013 ("**POPIA**").

5. COMPLAINT CHANNELS

5.1. MINT maintains multiple, accessible, and secure channels through which complaints may be lodged. MINT must ensure that all complaint channels are clearly communicated to customers and stakeholders in MINT's onboarding documentation, Terms and Conditions, Privacy Policy, website, and mobile application.

5.2. Complaints may be submitted through any of the following channels:

5.2.1. a dedicated complaints email address, being complaints@mymint.co.za, which is monitored on every Working Day by MINT's Legal, Risk and Compliance function;

5.2.2. a secure online complaint submission form accessible through MINT's website at www.mymint.co.za and through the MINT mobile application, designed to ensure data integrity, confidentiality, and auditability;

5.2.3. written correspondence, whether delivered electronically or in hard copy, addressed to MINT's Compliance Officer at MINT's registered office at 3 Gwen Lane, Sandown, Sandton, 2031;

5.2.4. verbal complaints, whether made telephonically to +27 10 276 0531 or in person, provided that: such complaints shall, as soon as reasonably practicable, be accurately reduced to writing by an authorised MINT representative; the written record shall, where feasible, be confirmed with the complainant for accuracy; and the written record shall constitute the official complaint for purposes of investigation and record-keeping; and

5.2.5. internal escalation and reporting mechanisms, including whistleblowing and ethics reporting channels, where the nature of the complaint relates to alleged misconduct, unlawful activity, regulatory non-compliance, or other matters warranting protected disclosure.

5.3. Anonymous complaints may be accepted and investigated at MINT's discretion, provided that the information submitted is sufficiently detailed and credible to permit a meaningful assessment and investigation. The absence of the complainant's identity does not preclude MINT from taking remedial action where the complaint discloses a systemic issue.

5.4. The submission of a complaint through any channel shall not, in itself, limit or prejudice any statutory, contractual, or common-law rights that a complainant may have, subject always to applicable law.

5.5. MINT reserves the right to request additional information where a complaint is incomplete, unclear, or incapable of investigation in its current form. Any such request shall not be used to unreasonably delay or frustrate the complaints handling process.

6. RECEIPT AND ACKNOWLEDGEMENT

6.1. Upon receipt, every complaint must be promptly recorded in MINT's centralised Complaints Register, which constitutes the official record for governance, risk management, audit, and regulatory reporting purposes. The Complaints Register must be maintained by the Legal, Risk and Compliance function and must be accessible at all times to the Compliance Officer and the relevant members of MINT's governance structures.

6.2. The Complaints Register must, at a minimum, record:

6.2.1. the date, time, and method of receipt;

6.2.2. the identity of the complainant, where disclosed;

6.2.3. a summary of the complaint and the issues raised;

6.2.4. the unique reference number assigned to the complaint;

6.2.5. the classification of the complaint in accordance with clause 7;

6.2.6. the internal owner or function responsible for handling the complaint;

6.2.7. all key milestones, including the date of acknowledgement, the date of any extension notices, and the date of resolution; and

6.2.8. the outcome of the complaint and any remedial actions taken.

6.3. MINT must acknowledge receipt of every complaint in writing within five Working Days of receipt, or within two Working Days in respect of a FAIS Complaint.

6.4. The written acknowledgement must:

6.4.1. confirm receipt of the complaint;

6.4.2. provide the complainant with the unique reference number assigned to the complaint for tracking purposes;

6.4.3. identify the person or function responsible for managing the complaint and provide contact details for that person or function;

6.4.4. outline the complaints handling process, including the classification that has been assigned to the complaint, the anticipated steps to be taken, and the indicative timeframe for resolution; and

6.4.5. inform the complainant of any information that must be provided to enable the complaint to be progressed.

6.5. The acknowledgement of receipt does not constitute an admission of liability, fault, or wrongdoing by MINT, and shall not prejudice MINT's rights or defences.

7. INITIAL ASSESSMENT AND CLASSIFICATION

7.1. Every complaint recorded in the Complaints Register must, as soon as reasonably practicable after acknowledgement, undergo an initial assessment conducted by an appropriately authorised and suitably qualified person within MINT's Legal, Risk and Compliance function.

7.2. The purpose of the initial assessment is to:

7.2.1. determine whether the complaint falls within MINT's jurisdiction, mandate, and control, and whether it is relevant for handling under this Policy;

7.2.2. identify and classify the nature of the complaint, including whether it relates to service delivery or operational matters, contractual or commercial arrangements, technical or platform performance, conduct or ethics, data protection or information security, or legal, regulatory, or compliance matters;

7.2.3. assess the materiality, severity, and risk profile of the complaint, having regard to potential financial exposure, legal or regulatory implications, reputational impact, operational or systemic risk, and potential impact on clients or other stakeholders; and

7.2.4. identify any immediate remedial, containment, or risk-mitigation actions required to prevent ongoing harm, preserve evidence, or ensure regulatory compliance, including the imposition of interim controls or legal holds where appropriate.

7.3. Following the initial assessment, every complaint must be classified into one of the following categories:

7.3.1. Low-Risk Operational Complaint: a routine or isolated complaint with limited impact and no material legal, regulatory, or reputational risk;

7.3.2. Standard Complaint: a complaint requiring substantive investigation and resolution that does not meet the threshold for a Material Complaint; or

7.3.3. Material Complaint: a complaint that, individually or in combination with related complaints, alleges unlawful, unethical, fraudulent, discriminatory, or grossly negligent conduct, raises potential breaches of law, regulation, or internal policy, involves significant financial exposure or systemic failure, or poses a material risk to MINT's reputation, business continuity, or stakeholder trust.

7.4. The outcome of the initial assessment and classification must be recorded in the Complaints Register and must be used to determine the applicable investigation methodology, escalation level, resolution timeframe, and governance oversight for the complaint.

7.5. The classification of a complaint may be reviewed and upgraded at any stage of the process if new information emerges or the risk profile changes.

8. INVESTIGATIVE PROCESS

8.1. Every complaint requiring investigation must be investigated by a suitably qualified, competent, and independent person or team. Independence requires that the investigator has no actual or perceived conflict of interest in relation to the subject matter and is not directly implicated in, or responsible for, the conduct or decision under investigation.

8.2. The scope and methodology of the investigation must be proportionate to the classification of the complaint and must be designed to ensure factual accuracy, fairness, and completeness. An investigation may include one or more of the following, as appropriate:

8.2.1. the review and analysis of relevant documents, records, correspondence, contracts, policies, system logs, and data sets;

8.2.2. the conduct of interviews with the complainant, affected persons, witnesses, and relevant MINT personnel;

8.2.3. consultation with, or referral to, internal specialists including the legal, risk, compliance, information security, data protection, or technology functions;

8.2.4. forensic, technical, or data-driven analysis, including system audits, access reviews, or algorithmic assessments, where the complaint raises issues of fraud, data integrity, cybersecurity, or systemic failure; and

8.2.5. the imposition of interim measures, safeguards, or controls where necessary to prevent ongoing harm or preserve evidence.

8.3. MINT may, at its discretion and where appropriate, appoint external independent advisors, including legal counsel, forensic investigators, auditors, or technical experts, particularly in relation to Material Complaints.

8.4. All investigations must be conducted in accordance with applicable law, ethically and in good faith, with due regard to procedural fairness and the rights of all affected parties, and in a manner that preserves confidentiality, legal privilege, and the integrity of the investigative process.

8.5. The findings, conclusions, and recommendations arising from an investigation must be appropriately documented, supported by evidence, and retained in accordance with MINT's records retention obligations. Investigation files must be maintained on a confidential basis and access must be limited to those with a legitimate need to know.

9. RESOLUTION TIMEFRAMES

9.1. MINT applies the following resolution timeframes, measured from the date of acknowledgement in accordance with clause 6.3:

9.1.1. Low-Risk Operational Complaints: MINT will use reasonable endeavours to communicate a final outcome within five Working Days of acknowledgement;

9.1.2. Standard Complaints: MINT will use reasonable endeavours to communicate a final outcome within fifteen Working Days of acknowledgement; and

9.1.3. Material Complaints and FAIS Complaints: MINT will use reasonable endeavours to communicate a final outcome within thirty Working Days of acknowledgement.

9.2. These timeframes do not constitute fixed or guaranteed service levels and may be extended where the complaint involves complex factual, technical, forensic, or legal analysis, depends on information or cooperation from third parties, raises issues subject to regulatory or parallel internal processes, or is otherwise incapable of resolution within the ordinary timeframe despite reasonable efforts.

9.3. Where MINT reasonably determines that a complaint cannot be resolved within the applicable timeframe, MINT must notify the complainant in writing without undue delay, setting out the reasons for the delay at an appropriate level of detail and providing an updated indicative timeframe for resolution or, where that is not reasonably practicable, periodic progress updates at reasonable intervals of not less than every ten Working Days.

9.4. Any extension of time and the reasons therefor must be recorded in the Complaints Register.

10. OUTCOMES AND RESOLUTION

10.1. Upon completion of the investigation, MINT will determine an appropriate outcome having regard to the findings, the evidence available, the applicable legal and contractual framework, and the risk profile of the complaint.

10.2. Possible outcomes include:

10.2.1. acceptance of the complaint, in whole or in part, together with the implementation of appropriate remedial or corrective action;

10.2.2. partial acceptance, where certain aspects of the complaint are substantiated and others are not, with reasons provided;

10.2.3. rejection of the complaint, in whole or in part, where the complaint is not substantiated, accompanied by a clear explanation of the basis for the decision; or

10.2.4. negotiated, alternative, or consensual resolution, including settlement, corrective undertakings, or other agreed measures, where this is appropriate and lawful.

10.3. Where a complaint is upheld in whole or in part, remedial actions may include:

10.3.1. corrective service or operational measures designed to address the specific issue raised;

10.3.2. enhancements to systems, processes, platforms, algorithms, or controls to prevent recurrence;

10.3.3. refunds, credits, fee adjustments, or other financial remedies, where contractually, legally, or commercially appropriate;

10.3.4. disciplinary or corrective action in accordance with applicable employment, contractor, or governance frameworks; and

10.3.5. amendments to policies, procedures, training programmes, or governance arrangements.

10.4. The selected outcome and any remedial actions must be proportionate to the nature and severity of the complaint, consistent with MINT's legal obligations and internal policies, and approved at an appropriate level of authority having regard to the classification of the complaint.

10.5. The outcome of the complaint, together with reasons, must be communicated to the complainant clearly and in writing, subject to applicable legal privilege, confidentiality obligations, and data protection requirements.

10.6. The determination of an outcome under this clause does not constitute an admission of liability, fault, or wrongdoing by MINT unless expressly stated otherwise. All outcomes and remedial actions must be documented and recorded in the Complaints Register.

11. ESCALATION AND REVIEW

11.1. A complainant who is dissatisfied with the outcome of a complaint may request escalation for further review, subject to the procedures in this clause.

11.2. An escalation request must be submitted in writing, must set out the grounds on which the complainant remains dissatisfied, and must be lodged within a reasonable period following the communication of the outcome.

11.3. Escalation under this Policy does not constitute a re-investigation as of right. It constitutes a review of whether the complaint was handled in accordance with this Policy, whether the investigation process was fair and proportionate, and whether the outcome was reasonable having regard to the information available at the time.

11.4. Depending on the nature, classification, and risk profile of the complaint, escalation may be directed to:

11.4.1. senior management, where the complaint relates to operational or service delivery matters;

11.4.2. the Legal, Risk and Compliance function, where the complaint raises legal, regulatory, ethical, or control-related issues;

11.4.3. the Executive Committee, where the complaint involves cross-functional risk, material financial exposure, or reputational impact; or

11.4.4. the Board of Directors or a duly constituted Board Committee, where the complaint constitutes a Material Complaint, involves senior management or executive-level conduct, or presents material legal, regulatory, or strategic risk to MINT.

11.5. Material Complaints must be escalated without delay to the Legal, Risk and Compliance function, irrespective of whether the complainant has requested escalation.

11.6. The outcome of any escalation or review must be documented, approved at the appropriate level of authority, and recorded in the Complaints Register.

11.7. The decision taken following escalation shall, subject to applicable law, constitute MINT's final internal position on the complaint.

12. REGULATORY AND EXTERNAL REFERRALS

12.1. Where required by law, regulation, or contractual obligation, or where otherwise reasonably appropriate, MINT may notify, engage with, or make disclosures to relevant regulators, supervisory authorities, or law enforcement agencies, and will cooperate fully with any external investigation, inquiry, inspection, or audit.

12.2. Any regulatory or external referral must be assessed and approved at an appropriate level of authority, coordinated through the Legal, Risk and Compliance function, and conducted in a manner that preserves confidentiality, legal privilege, and MINT's rights and defences.

12.3. Where a complaint gives rise to a reasonable prospect of litigation, regulatory enforcement, or formal investigation, MINT may issue legal hold notices, restrict communications, and engage external legal or forensic advisors.

12.4. Nothing in this Policy:

12.4.1. restricts or limits any person's right to refer a matter to an external dispute resolution body, regulator, ombud, or court of competent jurisdiction; or

12.4.2. obliges a complainant to exhaust internal complaint procedures before exercising any statutory or legal rights.

12.5. Where a complainant has lodged a FAIS Complaint and remains dissatisfied after receiving MINT's final internal response, or where MINT has not resolved the complaint within the timeframe required by the FAIS Code, MINT must inform the complainant of their right to refer the matter to the FAIS Ombud. The FAIS Ombud can be contacted as follows:

12.5.1. Website: www.faisombud.co.za;

12.5.2. Email: info@faisombud.co.za; and

12.5.3. Telephone: 012 762 5000.

12.6. Where a complaint relates to MINT's compliance with the Financial Sector Laws, the complainant may also refer the matter to the FSCA. Where a complaint relates to MINT's data processing activities, the complainant may refer the matter to the Information Regulator in accordance with POPIA.

13. RECORD-KEEPING AND REPORTING

13.1. MINT must maintain complete, accurate, and up-to-date records of all complaints, investigations, outcomes, and related correspondence in the centralised Complaints Register.

13.2. All complaints and related documentation must be retained in accordance with MINT's Records Retention Policy and applicable legal and regulatory requirements. For FAIS Complaints, records must be retained for a minimum of five years from the date of resolution. For all other complaints, records must be retained for a minimum of three years from the date of resolution.

13.3. Complaint records must be protected against unauthorised access, alteration, or destruction, and must be preserved in accordance with any applicable legal hold or evidence-preservation obligations.

13.4. The Compliance Officer must prepare and submit complaint-handling reports to management at least quarterly. Each quarterly report must include, at a minimum:

13.4.1. the number, type, and classification of complaints received during the reporting period;

13.4.2. analysis of root causes, recurring themes, and emerging trends;

13.4.3. average and outlier resolution timeframes, including any material delays;

13.4.4. identification of systemic, structural, or control-related issues; and

13.4.5. remediation measures implemented or proposed, together with progress against such measures.

13.5. The Compliance Officer must table a semi-annual complaints report to the Board Risk and Compliance Committee or such other Board sub-committee as the Board may designate. An immediate report must be submitted to senior management and the Board where any single complaint or cluster of complaints indicates a material systemic risk, regulatory breach, or potential class action.

13.6. MINT must submit complaints statistics to the FSCA as required by the FAIS Code and applicable FSCA Conduct Standards.

13.7. Complaints data may be aggregated and anonymised for purposes of risk management, reporting, training, and continuous improvement, subject to applicable data protection and confidentiality obligations.

14. FAIS-SPECIFIC COMPLAINTS OBLIGATIONS

14.1. Where a complaint constitutes a FAIS Complaint, the following additional requirements apply in addition to the general requirements of this Policy:

14.1.1. MINT must acknowledge the FAIS Complaint within two Working Days of receipt;

14.1.2. MINT must resolve the FAIS Complaint within the timeframes prescribed by the FAIS Code and any applicable FSCA Conduct Standard or directive;

14.1.3. MINT must keep records of all FAIS Complaints for a minimum of five years from the date of resolution;

14.1.4. MINT must include FAIS Complaints in MINT's complaints statistics reported to the FSCA as required by the applicable reporting obligations; and

14.1.5. MINT must cooperate fully with any investigation by the FAIS Ombud and must respond to requests for information or documentation within the prescribed timeframes.

15. **CONTINUOUS IMPROVEMENT**

15.1. MINT treats complaints as a critical source of risk intelligence and continuous improvement. MINT must implement processes to ensure that insights derived from complaints inform strategic, operational, and governance decision-making.

15.2. MINT must systematically analyse complaint data, trends, and root causes to identify systemic or recurring risks, weaknesses in products, services, platforms, algorithms, processes, or controls, and gaps in training, communication, or governance arrangements.

15.3. MINT must use the insights derived from complaint analysis to implement targeted corrective and preventive actions, enhance products, services, systems, and technological solutions, strengthen internal controls, compliance frameworks, and risk management practices, and inform policy development, training programmes, and operational standards.

15.4. Where complaint trends indicate material or systemic risk, MINT must escalate those risks to the appropriate governance forum and address them through documented remediation plans with defined ownership, timelines, and accountability.

15.5. Continuous improvement initiatives arising from complaints must be monitored, tracked, and reviewed to assess effectiveness and sustainability. Progress must be reported to the RCC at each quarterly meeting.

16. **TRAINING AND AWARENESS**

16.1. MINT must ensure that all personnel who are involved in, or may reasonably be expected to be involved in, the receipt, handling, investigation, escalation, or oversight of complaints receive appropriate, role-specific training before commencing such duties and at least annually thereafter.

16.2. Training must cover obligations relating to the receipt, handling, investigation, and resolution of complaints in accordance with this Policy and applicable law; confidentiality, data protection, and information security requirements; escalation pathways, decision-making thresholds, and governance structures applicable to different categories of complaints; and the consequences of non-compliance with this Policy.

16.3. MINT must maintain appropriate records of training undertaken for purposes of audit, compliance monitoring, and continuous improvement.

17. **GOVERNANCE AND OVERSIGHT**

17.1. This Policy is approved by the Board of Directors of MINT, which retains ultimate accountability for the effectiveness, adequacy, and oversight of MINT's complaints management framework.

17.2. The Board may delegate aspects of oversight under this Policy to the Risk and Compliance Committee or another duly constituted Board sub-committee, provided that such delegation does not dilute the Board's overall responsibility.

17.3. The Executive Committee is responsible for the implementation, administration, and day-to-day oversight of this Policy; ensuring that appropriate procedures, controls, and resources are in place to support effective complaint handling; monitoring compliance with this Policy and applicable legal and regulatory requirements; and escalating Material Complaints, systemic issues, and material breaches of this Policy to the appropriate governance forum.

17.4. Compliance with this Policy forms an integral part of MINT's enterprise risk management framework, internal control environment, and governance processes. Material non-compliance with this Policy may result in disciplinary action and may be escalated to senior management, the Executive Committee, or the Board, as appropriate.

18. **ACCESSIBILITY OF THIS POLICY**

18.1. The current version of this Policy must be:

18.1.1. published on MINT's website at www.mymint.co.za and made easily accessible to customers through the MINT platform;

18.1.2. provided to any customer upon request at no cost;

18.1.3. communicated to all employees and representatives involved in complaint handling at the time of appointment and following any material amendment; and

18.1.4. referenced in MINT's Terms and Conditions, Privacy Policy, and onboarding documentation.

19. **POLICY REVIEW AND AMENDMENT**

19.1. This Policy must be reviewed by the Compliance Officer at least annually. A reviewed and, where necessary, updated version must be presented to the Board for approval no later than twelve months after the date of the most recent Board approval.

19.2. An earlier review is required where there are changes in applicable law, regulation, or regulatory guidance; material changes to MINT's business model, technology, or risk profile; findings arising from complaints, audits, or regulatory reviews; or identified deficiencies in the operation or effectiveness of this Policy.

19.3. Any material amendment to this Policy must be approved by the Board. The current version number, date of adoption, and Board resolution number must be reflected on the face of this Policy at all times.

[END]