

COMPLAINTS PROCEDURE

Novac Asset Management Limited is committed to maintaining the highest standards of professionalism, transparency and client service.

If you are dissatisfied with any aspect of our service, conduct, communications or handling of your information, we encourage you to raise the matter with us promptly.

1. Our Commitment

We aim to:

- Treat all complaints fairly and respectfully
- Investigate complaints promptly and objectively
- Keep complainants informed throughout the process
- Seek to resolve complaints quickly and effectively
- Use complaints to improve our systems and services

2. What Constitutes a Complaint

A complaint may relate to:

- Investment or advisory services
- Delays or administrative errors
- Conduct of staff or representatives
- Website or client portal issues
- Handling of personal information
- Communications or disclosures
- Future collective investment schemes or client accounts

3. How to Submit a Complaint

Complaints may be submitted by:

- Email
- Letter
- Website contact form
- Telephone
- In person

Complaints should include:

- Full name and contact details

- Description of the complaint
- Relevant dates and supporting documents
- Details of the outcome sought

Complaints should be addressed to:

Complaints Officer Novac Asset Management Limited 32 Roan Road Kabulonga Lusaka, Zambia

Email: complaints@novac.co.zm

4. Complaint Handling Process

Stage 1 – Acknowledgement

We aim to acknowledge receipt of a complaint within Seven (7) business days.

Stage 2 – Investigation

The complaint will be investigated by an appropriately authorised person who was not directly involved in the matter where possible.

We may contact you to request additional information.

Stage 3 – Response

We aim to provide a written response within twenty (20) business days after receiving all relevant information.

Where the matter is complex and requires more time, we will inform you of the expected timeframe.

Stage 4 – Resolution

Where a complaint is upheld, Novac may:

- Provide an explanation or clarification
- Take corrective action
- Review internal procedures
- Issue an apology
- Take any other appropriate remedial action

5. Escalation

If you remain dissatisfied after receiving our response, you may escalate the complaint to the appropriate regulator or authority.

6. Complaints About Personal Information

Complaints relating to the use or handling of personal information should be directed to:

Data Protection Officer Email: privacy@novac.co.zm

7. Confidentiality

All complaints will be handled confidentially and only disclosed to persons who require access in order to investigate or resolve the matter.

8. Record Keeping

Novac will maintain records of all complaints received and the actions taken in response.

These records may be retained for legal, regulatory and audit purposes.

9. Review of this Procedure

This Complaints Procedure may be updated from time to time to reflect changes in law, regulation or internal processes.
