

FORM IPM 310

COMPLAINTS PROCEDURE

CO = Compliance Officer
CEO = Chief Executive Officer
Reps = FAIS Representatives

| Area of Compliance | Procedure | Frequency | Resp |
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| Purpose | Vunani Fund Managers (Pty) Ltd (“VFM”) is an authorised financial services provider (FSP no. 608) in terms of the Financial Intermediary and Services Act no. 37 of 2002 (“the Act”). The purpose of this procedure document is to ensure that all client complaints are brought to the attention of management and the designated KI timeously; are handled with fairness and transparency; are clearly described and timeously remedied to minimise reputational risk, to ensure that our clients are treated fairly and that all aspects and requirements as set down in the Act have been complied with. | Continuous | All Vunani Fund Managers’ staff & reps |
| Definition of complaint s1 FAIS Para 16(1) BN80 of 2003 Treating Customer Fairly definition of “ complaint ” | <p>In terms of FAIS and the FSCA Treating Customers Fairly Complaints Management discussion document, a complaint means: a specific expression of dissatisfaction, submitted by a client (complainant) to Vunani Fund Managers for purposes of resolution by VFM, relating to a product or financial service rendered by VFM or its representative to the complainant and in which complaint it is alleged that VFM staff or its representative:</p> <ul style="list-style-type: none"> • has contravened or failed to comply with FAIS, an agreement, a law, a rule or code of conduct which is binding on VFM and that as a result thereof the complainant has suffered or is likely to suffer financial prejudice or damage; • has wilfully or negligently rendered a financial service, or failed to render a financial service to the complainant, and that such act or failure to act has caused prejudice or damage to the complainant or is likely to result in such prejudice or damage; • carried on its business in such a manner as to constitute malpractice. • has treated the complainant unfairly; or • any other oral or written communication received from a client which may in any way reasonably be interpreted as a complaint <p>Regardless of whether such an expression of dissatisfaction is submitted together with or in relation to a client query.</p> | | |

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| <p>“Complainant”</p> | <p>NB: These procedures are mainly concerned with significant complaints (rather than queries). The term significant complaint includes one which cannot be settled quickly and directly and one which involves material amounts in relation to the financial circumstances of the complaint. The most serious complaints would relate to bad advice and mis-selling. Performance issues are usually queries resolved by giving an explanation for the poor performance.</p> <p>Complainant means: a person who submits a complaint to Vunani Fund Managers and who</p> <ul style="list-style-type: none"> a) is a client or prospective client of Vunani Fund Managers and has a direct interest in the agreement, product or service to which the complaint relates; or b) is a person acting on behalf of a person mentioned in (a). <p>provided that a prospective client will only be regarded as a complainant to the extent that the complaint relates to the prospective client’s dissatisfaction in relation to the application, approach, solicitation or advertising or marketing material contemplated in the definition of “prospective customer”.</p> | | |
| <p>“Compensation payment”</p> | <p>Compensation payment means a payment, other than a goodwill payment, by VFM to a complainant to compensate the complainant for a proven or fairly estimated financial loss incurred as a result of VFMs contravention, non-compliance, action, failure to act, or unfair treatment forming the basis of the complaint, where VFM accepts liability for having caused the loss concerned.</p> <p>“Compensation payment” excludes –</p> <ul style="list-style-type: none"> (a) payment of amounts contractually due to the complainant in terms of the financial product or service concerned, or (b) refunds of amounts paid by or on behalf of the complainant to the financial institution where such payments were not contractually due <p>but includes interest on late payment of amounts or refunds referred to in (a) or (b).</p> | | |
| <p>“Reportable complaint”</p> | <p>Reportable complaint means any complaint <u>other than a complaint that has been –</u></p> <ul style="list-style-type: none"> (a) upheld immediately by the person who initially received the complaint; (b) upheld within the financial institution’s ordinary processes for handling customer queries in relation to the type of agreement, product or service complained about, provided that such process does not take more than five business days to complete from the date the complaint is received; or (c) submitted to or brought to the attention of the financial institution in such a manner that the financial institution does not have a reasonable opportunity to record such details of the complaint as may be prescribed in relation to reportable complaints. | | |

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| | <p>VFM has developed an internal complaint resolution system and implements or maintains an incident register to manage customer complaints. VFM uses this register as an important source of management information to measure the delivery of TCF outcomes. The incident register contains:</p> <ul style="list-style-type: none">• All details of the incident/complaint including copies of relevant correspondences.• Appropriate TCF aligned categorisation of the incident/complaint.• Progress and status updates of the incident/complaint, including monitoring progress to note if resolution falls within or outside any relevant prescribed timelines or internal service levels; and• Details of numbers of incident/complaints received, upheld, rejected and escalated. <p>The incident register is reviewed in the operations meetings and included in the CO report to the Board.</p> <ul style="list-style-type: none">• The CO / staff member /CEO must: (within 24 hours)<ul style="list-style-type: none">○ record details of the complaint in the Register of Complaints: Complaints and Incidents Register.xls;○ promptly acknowledge receipt of the complaint in writing to the client and communicate the contact details of VFM staff who will be involved in the resolution of the complaint, and○ Immediately inform VFMs’ management team and Key Individuals.• The responsible VFM staff member / representative must prepare a preliminary report, which must include: the identity of the complainant, the substance of the complaint, all correspondence in relation to the complaint, any corrective action taken and suggested response to the complaint:<ul style="list-style-type: none">○ this report shall be assessed by the CO to determine whether additional work is required, and who shall perform such work;○ the final report on the complaint shall be given to the CO for submission to VFMs’ management for a decision on any compensation with the complainant.○ if the outcome is not favourable to the client, VFM must provide full written reasons to the client within 4 weeks of receipt of a complaint.○ if the complaint is resolved in favour of the client, VFM must ensure that a full and appropriate level of redress is offered to the client without any delay.○ The client must in all instances be informed of the outcome of the investigation / complaint within 4 weeks of receipt of the complaint.• In resolving the complaint VFM must act in a timely, transparent, and fair manner and must take steps to investigate and respond promptly to any complaints.• If after 3 weeks of receipt of a complaint, it appears improbable that a resolution will be reached within 4 weeks, VFM must send written notification to the client detailing an appropriate explanation as to why VFM is not able to resolve the complaint. | | CO / CEO |
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| <p>Standards for complaints record keeping</p> | <ul style="list-style-type: none"> • If within 4 weeks of receipt of a complaint VFM has been unable to resolve the complaint to the satisfaction of the client, VFM must: • <u>Notify the client in writing that he / she may refer the complaint to:</u> <ul style="list-style-type: none"> ○ the Ombud for Financial Services Providers (for FAIS related complaints) <ul style="list-style-type: none"> ▪ Attention: FAIS OMBUD ▪ Address: P O BOX 74751, Lynnwood Ridge, 0040 ▪ Contact number: 086 066 3247 / 012 – 762 5000 ▪ Website: www.faisombud.co.za ○ If the client wishes to pursue the matter further before the Ombud: <ul style="list-style-type: none"> ▪ Provide the client with an explanation and a clear written summary of action taken by VFM. ▪ Notify the client that such referral: <ul style="list-style-type: none"> • to the FAIS OMBUD must take place within 6 months of the receipt of such notification from VFM, and; • to the Director Surveillance must take place within 4 weeks of receipt of VFM response to the complaint and within 6 months of the conduct by VFM that gave rise to the complaint. An unresolved complaint lodged subsequent to this will be considered, provided that failure to lodge the complaint within the relevant period was through no fault of the client. • The compliance officer must ensure that the Register of Complaints (Complaints and Incidents Register.xls) is kept up to date by recording: the nature of the complaint, the manner in which it was resolved and whether the client was satisfied with the outcome. • The Complaints and Incidents Register must be kept for a period of 5 years. | | <p>CO</p> |
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**TCF Aligned
Complaints/Incidents
categories**

Outcome 1: Complaints relating to the company's lack of fairness in the conduct of its business dealings.
VFM provides discretionary asset manager services to institutional investors. Treating customers fairly is central to all VFM business activities. We instil a culture of high-quality service delivery, fair treatment of clients and transparency throughout all levels of our organisation to ensure that fairness is not just considered in relation to how clients are serviced but is integrated in the way clients are treated throughout the entire client relationship life cycle.

Dealing with institutional investors demands a high level of professionalism and accountability for delivering on our service level agreements. We focus on finding solutions which enable us to deliver on our commitments.

Outcome 2: Complaints relating to the design of a product or service.
This category includes complaints/incidents indicating that specific features of the product or services are unfair, inadequate, confusing, overly complicated, or unsuitable. The category is regarding unfair or confusing pricing, costs or charges. The category also includes complaints regarding the features or operation of bundled products or add-on/value added services, customer incentives or loyalty benefits.

VFM does not deal directly with retail clients. We are the appointed investment manager for several collective investment schemes. The investment objectives of the funds VFM manages are set by the relevant Management Company. In the case of institutional clients, VFM drafts the investment objectives in consultation with the funds' investment committee or asset consultant based on the benchmark set by the client and taking into account any relevant regulatory constraints or unique circumstances.

The above, however, does not absolve VFM of its TCF obligations. Our fees are quoted in the mandate, as well as details of the all the costs borne by the client with regards to trading and VAT. We do not offer customer incentives or loyalty benefits.

Outcome 3: Complaints relating to information provided
This category includes complaints regarding communication / emails/ documentation provided, including marketing material that is inaccurate, unsuitable, misleading, incomplete, confusing, or unclear. A complaint could apply to the content, the manner or medium through which it was provided or the failure to provide information or the timing of the provision.

VFM has a marketing policy which compels staff to follow a prescribed process when marketing its services to prospective clients to ensure that the quality of our financial service is not compromised by marketing or advertising practices. We provide our clients with clear information and keep them appropriately informed before, during and after the point of sale. We ensure that products, service, and risk information remain clear and comprehensible and that our services are delivered with clarity and transparency and do not contain any hidden conditions or rely on complex technical definitions.

Outcome 4: Complaints relating to advice

This category includes complaints that advice provided was inadequate, factually incorrect or misleading or advice was not provided when the complainant believes it should have been provided. Complaints indicating that the adviser was a subject to a conflict of interest, or was lacking in knowledge, skill, experience or integrity.

Advice is not a regular feature of VFM business. VFM’s client base is institutional (retirement funds, medical aid schemes, multi-managers and insurance companies). Typically, the type of advice VFM may be asked to give would involve discussing a fund’s investment objective and we ensure that the advice is appropriately recorded.

Outcome 5

(a): Complaints relating to product performance.

This category includes but not limited to complaints regarding perceived poor investment returns, this will include lack of adequate information being supplied to a client regarding the products ability to meet expectations,

The primary responsibility for the management of portfolios – both performance and risk management – as well as client communication regarding queries relating to performance of the portfolios inclusive of any environmental matters affecting performance, rests with the appointed portfolio managers. However, the Chief Investment Officer of VFM shall at all times remain accountable for all fund performance and related investment risk metrics..

(b): Complaints relating to customer service.

This category relates to dissatisfaction with VFM’s administration of requests and/or transactions, payments to clients, including complaints about the way staff treat customers, breach of confidentiality or privacy also fall under this section.

VFM’s Exco is the designated operational unit responsible for oversight of this function. Our approach to managing client relationships is informed by our values expressed through our company culture. VFM and all its key individuals and staff observe the principles embodied in the General Code of Conduct, TCF policy, and industry best practice.

VFM will assess the cause or errors giving rise to any complaint or dissatisfaction and the impact it has on a client’s portfolio and ultimately, the client relationship with VFM. Where an error is a direct result of an action that had or should have been taken by VFM, the client will be compensated for any direct loss. Where the error is due to the actions of a third party VFM will pursue a remedy directly with that third party to the satisfaction of the client. This applies to all errors, whether picked up internally or reported by clients.

Outcome 6

(a): Complaints relating to product accessibility, changes or switches.

This category relates to complaints in respect of barriers or limitations on access to funds or on the ability to transfer products or services to another provider or on the ability to make changes to the product or service. Types of barriers or limitations covered would include penalties, termination charges, lengthy notice periods, complex “red tape” administrative hurdles when trying to access funds, etc

VFM does not impose any exit penalties, surrender fees or other charges to discourage clients from withdrawing from products. All fees are clearly disclosed in client mandates and clients are sent a fee invoice reflecting the fee calculation,

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| <p>Standards for complaints monitoring and analysis</p> | <p>which clearly depicts the fee rule.</p> <p>(b): Complaints relating to complaints handling. This includes complaints relating the administration of the complaints process, such as delays, poor communication regarding processes and decisions, cumbersome or inaccessible processes, failure to inform complainants of their right regarding escalation or Ombud mechanisms, etc</p> <p>Every client mandate has a FAIS disclosure annexure complying with the requirements set out by FAIS and this briefly outlines how complaints can be lodged. The annexure states that a detailed copy of the internal complaint resolution system and procedure can be obtained from the compliance officer and provides the necessary contact details of the compliance officer.</p> <p>(c): Complaints relating to Service Level Agreement (SLA) not met. This category is added by VFM, specifically for non-reportable complaints / incidents.</p> <p>Dealing with institutional investors demands a high level of professionalism and accountability for delivering on our SLA. The VFM’s culture is to encourage and support its employees to integrate TCF principles in the way we handle our clients’ business. All VFM employees are trained in dealing with clients and VFM strives to continuously meet its obligations and deliver upon the service promise as outlined and detailed in the service agreements.</p> <p>VFM’s Exco is the designated operational unit responsible for oversight of this function.</p> <p>Other Complaints A catch-all category for any complaints not falling within one of the above TCF aligned complaints categories or sub-categories.</p> <p>VFM Compliance Officer performs an ongoing monitoring/ reporting and analysis of VFM Complaints Management Process (CMP). This ongoing monitoring forms part of the Risk Management Plan reporting process and the outcomes gets reported to the Board through the Compliance Report.</p> <p>Effective monitoring and analysis of complaints is a key tool for VFM to identify, manage and mitigate emerging TCF related and other market conduct risks within our operations and provides opportunities for improving TCF outcomes for our customers, and to prevent recurrence of poor outcomes and errors.</p> <p>Complaints Analysis performed by VFM Compliance Officer includes the following:</p> <ul style="list-style-type: none"> • Identification of root causes – in the Compliance quarterly report to the Board and the Key Individuals • Identification of fails in control systems and procedures required to avoid a reoccurrence • Identify where staff training is required. • Detection of poor staff, service provider performance, lack of skills or misconduct; and | | |
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| | <ul style="list-style-type: none"> Demonstrate the benefits of effective complaints management to make meaningful improvements for clients and the business. | | | | | | |
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| <p>POPI Act; Protection of Personal Information Act, 4 of 2013</p> | <p>Should a person (disclosing party) have a complaint with regards to any matter governed by POPI, without prejudice to any other rights that person may have in law, they can lodge a written complaint, together with supporting documentation, for the attention of the information officer and the compliance officer.</p> <p>Information Officer: Kirsten Elvin-Jensen E-mail: kirstenej@vunanifm.co.za</p> <p>Deputy Information Officer: Vuyiseka Kulati E-mail: vuyiseka@vunanifm.co.za</p> <p>E-mail: compliance@vunanifm.co.za</p> <p>VFM will attempt to resolve the complaint by following the same steps and timelines listed above in terms of this complaints policy.</p> <p>Should the Disclosing Party be dissatisfied with the resolution of the complaint by VFM, the Disclosing Party may refer the complaint to the Information Regulator whose contact information is set out below:</p> <table border="1" data-bbox="590 1032 1598 1211"> <thead> <tr> <th data-bbox="590 1032 1073 1076">Physical Address</th> <th data-bbox="1073 1032 1598 1076">Email / Website</th> </tr> </thead> <tbody> <tr> <td data-bbox="590 1076 1073 1211"> JD House, 27 Stiemens Street Braamfontein, Johannesburg, 2001 </td> <td data-bbox="1073 1076 1598 1211"> General enquiries: inforeg@justice.gov.za Complaints: complainants.IR@justice.gov.za Website: https://www.justice.gov.za/inforeg/ </td> </tr> </tbody> </table> | Physical Address | Email / Website | JD House, 27 Stiemens Street Braamfontein, Johannesburg, 2001 | General enquiries: inforeg@justice.gov.za Complaints: complainants.IR@justice.gov.za Website: https://www.justice.gov.za/inforeg/ | | |
| Physical Address | Email / Website | | | | | | |
| JD House, 27 Stiemens Street Braamfontein, Johannesburg, 2001 | General enquiries: inforeg@justice.gov.za Complaints: complainants.IR@justice.gov.za Website: https://www.justice.gov.za/inforeg/ | | | | | | |
| <p>General Principles</p> | <ul style="list-style-type: none"> VFM Management must at all times be available to assist in the resolution of complaints. All employees and representatives involved in the resolution of complaints must be committed to finding a solution which is "fair" to all parties involved. Complaints must be handled within the time limits stipulated above. Confidentiality of client data. VFM will maintain the confidentiality of clients' personal information and comply with the relevant legislation to ensure information protection unless disclosure of the information is required by law. Accuracy of record-keeping. Complaints must be accurately, efficiently, and securely recorded. This includes correctly categorising complaints according to their nature and the TCF outcomes. Appropriate monitoring, | <p>Continuous</p> | <p>All Vunani Fund Managers' staff & reps</p> | | | | |

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| | <p>quality assurance, training and performance management is provided to ensure this.</p> <ul style="list-style-type: none"> All Complaints and Incidents which are not necessarily “Complaints”, but have a financial implication, for example, interest claim on an overdrawn bank account, are recorded in the Register in order to identify recurring / systemic problems and / or any training requirements. | | |
| <p>Availability of these procedures Para 19, BN80 of 2003</p> | <ul style="list-style-type: none"> A copy of VFM complaints procedure is available on our website: www.vunanifm.co.za or a copy can be requested from compliance@vunanifm.co.za VFM’s FAIS Disclosure statement is a standard annexure to our FSCA approved client mandate and refers to complaints handling and states that clients can contact the compliance officer (whose details are provided in the annexure) to receive a copy of this complaints policy. | On request | CO / CEO & All Staff – available on Intranet |
| <p>Staff Training</p> | <ul style="list-style-type: none"> All staff receives annual training on FICA, FAIS and other relevant legislation. All VFM policies and procedures are available to all staff on the Intranet. Staff are notified via email of any changes to policies and / or procedures and training is provided, if required. Annual and refresher TCF training is included in our FAIS training and offered to staff to keep them abreast with the new developments. | Continuous | All Vunani Fund Managers’ staff & reps |
| <p>Public complaints reporting</p> | <p>Principle 9 of the G20 High-level Principles on Financial Consumer Protection requires firms to publicly disclose prescribed elements of their complaints related data. The TCF roadmap intends to go beyond this minimum standard and will require firms to publicly disclose prescribed elements of their own complaints related data. The FSCA has undertaken to provide further guidelines.</p> | | |
| <p>Attachments</p> | <ul style="list-style-type: none"> Annexure A_Resolution of Complaints in terms of FAIS Annexure B_Receipt of Complaint Form | | |

ANNEXURE A

THE RESOLUTION OF COMPLAINTS IN TERMS OF THE FINANCIAL ADVISORY AND INTERMEDIARY SERVICES ACT

The Financial Advisory and Intermediary Services Act, 2002 (“the Act”) regulates the provision of various financial services in South Africa. One of the matters provided for in the Act is a procedure for dealing with complaints made against financial services providers.

The Act establishes the office of the Ombud for Financial Services Providers (“the Ombud”). Complaints about financial services providers may be referred to the Ombud. There are certain provisions that apply should you wish to refer a complaint to the Ombud. Information in this regard is set out below.

What complaints are dealt with by the Ombud?

The Ombud deals with any specific complaint relating to a financial service rendered by a financial services provider or a representative of a financial services provider to the complainant in which it is alleged that the financial services provider or representative –

- Has not complied with a provision of the Act and the complainant has as a result suffered financial prejudice or damage or is likely to do so;
- Has wilfully or negligently rendered a financial service to the complainant which has caused prejudice or damage to the complainant or is likely to do so; or
- Has treated the complainant unfairly

Who may be a complainant?

A complainant must be a client of a financial services provider, but where appropriate may also include the client’s lawful successor in title or the nominated beneficiary of the financial product which is the subject of the complaint.

Steps to be taken for submitting complaint and applicable time periods

- A complainant must endeavour to resolve a complaint with the financial services provider concerned before submitting it to the Ombud.
- The complaint must be made to the financial services provider in writing and must set out all relevant information. All relevant documentation should be attached.
- The financial services provider must have failed to address the complaint satisfactorily within six weeks of receiving it, before the complaint can be submitted to the Ombud.
- The complainant has **six months** after receiving the final response of the financial services provider, or after the response was due, to submit a complaint to the Ombud.
- When a complaint is submitted to the Ombud, the complainant must satisfy the Ombud that he/she attempted to resolve the complaint with the financial services provider concerned and must produce the final response of the financial services provider (if any) and the complainant’s reasons for disagreeing with it.
- Complaints must generally be submitted to the Ombud in writing with all relevant documentation.

When will the Ombud not investigate a complaint?

The Ombud must decline to investigate any complaint which relates to an act or omission which occurred on or after the date of commencement of the Act, but more than three years before the date of receipt of such complaint by the Office; provided that where the complainant was unaware of the occurrence of the act or omission, the period of three years commences on the date on which the complainant became aware or ought reasonably to have become aware of such occurrence, whichever occurs first.

The Ombud will not investigate a complaint where court proceedings have been instituted.

The Ombud may also on reasonable grounds decide that a complaint be dealt with by a court or through any other available dispute resolution process, and decline to entertain the complaint.

Further limitations on the type of complaint which may be dealt with by the Ombud are set out in the Rules on Proceedings of the office of the Ombud for Financial Services Providers, referred to below.

Rules on Proceedings of the Office of the Ombud

Please note that Rules on Proceedings of the office of the Ombud for Financial Services Providers have been published. These contain full details of the provisions that apply to proceedings before the Ombud and can be found on the financial services board website at <https://www.fsca.co.za/Regulatory Frameworks / Notices / by year 2004> BN100 of 2004 or will be provided to you on request.

Contact details of the Ombud

Telephone: +27 12 762 5000 / +27 12 470 9080

Sharecall: 0860663247

E-mail Address: info@faisombud.co.za

Website: www.faisombud.co.za

Postal Address:

P O Box 74571

Lynwood Ridge

0040

Physical Address:

Kasteel Park Office Park

Orange Building, 2nd Floor

546 Jochemus Street

Erasmus Kloof

Pretoria, 0048

FAIS complaint Form is available on the FAIS OMBUD website: www.faisombud.co.za

ANNEXURE B

RECEIPT OF COMPLAINT FORM

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| Name of Employee / Representative: | |
| Date: | |
| Client Name: | |
| Date complaint received by employee / representative: | |
| Did you advise the client of Vunani Fund Managers complaints resolution procedure? | <input type="checkbox"/> YE <input type="checkbox"/> N |
| Did the client address the complaint to the Compliance Officer? | <input type="checkbox"/> YE <input type="checkbox"/> N |
| Method of communication of complaint to employee / representative: (Telephone, post, fax, email etc.): | |
| Summary / description of the complaint: | |
| | |
| List of the documentation received and attached to this form: | |
| | |
| Employee comments: | |
| | |
| I confirm the information provided herein is true and correct | |
| Employee signature: | |
| Date: | |
| Compliance Officer / Information Officer comments: | |
| RECEIVED BY: | |
| DATE: | |
| Compliance officer / Information Officer signature: | |
| Date: | |
| CEO signature: | |

Date: