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committed to **protect**
and **grow** your savings

Customer Complaint Resolution Policy



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Granate Asset Management (Pty) Ltd

is an authorised Financial Services Provider (FSP 46189) Reg No. 2015/090537/07

Version Control

Version No.	Update Date	Date tabled at Risk Committee	Purpose of changes*	Details of revisions to document
1.0		08.10.2020	N/A	First draft of document
2.0	17.03.2022	May 2022	Ad hoc update	Stylistic, grammatical, and plain language review
3.0	08.02.2023	08.02.2023		Amendment to General Code of Conduct (GCOC) which affected the following on this policy: -Complaint definition -What records this document is referring to -Replacing reference to section 16 of the previous GCOC to the amended GCOC section 17(8) -Including categories of complaints

* For example: Annual policy and procedures review, changes in legislation and ad hoc update

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Introduction

This policy sets out how to lodge a complaint with Granate Asset Management (Pty) Ltd (Granate), what to expect from us once we receive your complaint and steps you can take if you are dissatisfied with how we resolve your complaint.

One of Granate's values is Client Service. We are committed to providing exceptional service to our clients. Complaints therefore deeply disappoint us, and we move promptly to address any client unhappiness. Although we always try to resolve complaints as soon as possible, legislation:

- i. prescribes a few steps we must follow when we receive a complaint; and
- ii. offers our clients ways to escalate unresolved complaints

What is a complaint?

Granate would like to hear from any unhappy client, but we also need to provide you with the legal definition of a complaint. Please see the extracts in the 'Applicable legislation' section for this definition.

Granate's Complaint Procedure

How to submit a complaint

Please let us know at any time if you are dissatisfied with our service. You can do so by contacting your dedicated contact person or sending an email to info@granate.co.za. Please include the following information:

1. your name, surname and contact details;
2. a complete description of your complaint;
3. the name of the team member who provided you with the financial services in question;
4. the date on which the matter occurred;
5. all the supporting documentation relating to your complaint; and
6. your preferred method of communication (i.e., email, post or telephone).

How Granate will respond to complaints

1. All complaints will be referred to our Head of Clients. You will receive his contact details as well as those of any team members who will be involved in resolving your complaint.
2. We will acknowledge receipt of your complaint as soon as possible (within 48 hours) and will record it in our Complaints Register (see Annexure A).
3. We will categorise reportable complaints in accordance with the following minimum categories, complaints relating to:
 - i) Fees, premiums or other charges;
 - ii) Information provided to clients
 - iii) Performance of financial service
 - iv) Premium/investment contribution collection
 - v) Redemption of investments
 - vi) Complaints handling process

4. We will keep all records for at least five years.
5. We will identify and consider all the issues you raise and will submit any additional questions to you in writing or telephonically.
6. We will try our best to resolve your complaint immediately.
7. If this is not possible, we will investigate further as thoroughly and quickly as we can.
8. We will remain transparent throughout our investigation and will give you feedback every three business days. If your complaint remains unresolved, we will provide a progress report after three weeks.
9. If the person handling your complaint cannot reach an agreement with you within seven business days, the complaint will be escalated to our Executive Committee for immediate attention. The committee will aim to resolve it within three weeks from when it was originally submitted by you.
10. If the Executive Committee needs further information, we will agree a reasonable amended timeframe with you.
11. We will communicate the findings and resolution of the investigation with you in writing and will also record this in our Complaints Register.
12. If the complaint is resolved in your favour, we will immediately offer a full and appropriate level of redress.

Unresolved Complaints

If we are unable to resolve your complaint to your satisfaction within six weeks of receiving it, we will inform you that you can refer your complaint to the office of the Ombud for Financial Service Providers. You will need to do so within six months of receiving the notification from us.

We will provide you with the following contact details for the Ombud:

Ombud for Financial Service Providers

Tel: +27(12) 762 5000
Email: info@faisombud.co.za
Website: www.faisombud.co.za
Postal address: P.O. Box 74571, Lynnwood Ridge, 0040

For further detail, please refer to the following extracts from the 'Rules on proceedings of the Office of the Ombud for Financial Services Providers', as published in Board Notice 81 of 2003:

Type of complaints justiciable by Ombud

- a) For a client complaint to be submitted to the Office:
 - i. the complaint must fall within the ambit of the Act [The Financial Advisory & Intermediary Services Act, No. 37 of 2002] and these Rules;
 - ii. the person against whom the complaint is made must be subject to these rules (hereafter referred to as "the respondent");
 - iii. the act or omission complained of must have occurred at a time when these rules were in force; and

- iv. the respondent must have failed to address the complaint satisfactorily within six weeks of its receipt.
- b) A complainant may seek any relief relating to the subject matter of the complaint, but a complaint constituting a claim for a monetary award, must relate to the redress of financial prejudice or damage suffered or likely to be suffered by the complainant.
- c) The complaint must not constitute a monetary claim in excess of R800 000.00 for a particular kind of financial prejudice or damage, unless the respondent has agreed in writing to this limitation being exceeded, or the client has abandoned the amount in excess of R800 000.00.
- d) The Ombud may also entertain a complaint relating to a financial service rendered by a person not authorised as a financial services provider or by a person acting on behalf of such person.
- e) When the Ombud receives a referral from the registrar as contemplated in section 4(4)(c) of the Act, the Ombud must in writing notify the client concerned thereof and require the client to inform the Ombud whether the client wishes to pursue the complaint in accordance with the provisions of Part I of Chapter VI of the Act.
- f) The complaint must not relate to the investment performance of a financial product which is the subject of the complaint, unless such performance was guaranteed expressly or implicitly or such performance appears to the Ombud to be so deficient as to raise a prima facie presumption of misrepresentation, negligence or maladministration on the part of the person against whom the complaint is brought, or that person's representative.

Rights of complainants in connection with complaints

- a) The client must qualify as such in terms of the Act and these Rules.
- b) Before submitting a complaint to the Office, the client must endeavour to resolve the complaint with the respondent.
- c) The complainant has six months after receipt of the final response of the respondent, or after such response was due, to submit a complaint to the Office.
- d) On submitting a complaint to the Office, the complainant must satisfy the Ombud of having endeavoured to resolve the complaint and must produce the final response (if any) of the respondent as well as the client's reasons for disagreeing with the final response.
- e) A complaint must be submitted to the Office in writing or, in circumstances deemed appropriate, the Ombud may receive a complaint in any other manner which conveys the complaint in comprehensible form.
- f) A complaint must, where necessary, be accompanied by available documentation in the complainant's possession.
- g) The complainant must be advised by the Ombud of the response of the respondent to the extent necessary to react to such response and to decide whether the complaint should be proceeded with, and must thereafter within two weeks advise the Ombud of such reaction and decision.
- h) Subsequent to lodging a complaint with the Ombud, the complainant is entitled to submit further facts, information or documentation in connection with the complaint and must do so, to the extent possible, if requested by the Ombud.

Administrative and procedural matters

- a) The Ombud may decline to investigate a complaint, or may suspend the investigation, when to the knowledge of the Ombud the complainant intends proceeding to or has already embarked on litigation.
- b) Information provided to the Ombud is confidential and may only be disclosed by the Ombud to the commissioner or to another party to the complaint to the extent necessary to resolve the complaint, or where required under the Act or any other law.
- c) The Ombud is not liable to be subpoenaed to give evidence on the subject of a complaint in any proceedings.
- d) The Ombud may take such steps as deemed expedient to advise the public on the existence of the Office, the procedure for submitting a complaint to the Office, or on any other aspect concerning the Office to facilitate the submission or disposal of complaints.

Appeals

- a) A party against whom the Ombud has made a determination may apply to the Ombud for leave to appeal against the determination.
- b) Such application must be in writing, must be submitted to the Ombud within one month of the date of the determination, and must set out the grounds on which the application is made.
- c) In weighing the application, the Ombud must consider the factors set out in section 28(5)(b) of the Act and may request and consider submissions by any other party to the complaint concerning the merits of the application.
- d) If the Ombud refuses leave to appeal, the applicant must be advised in writing and given reasons for such refusal.
- e) The applicant may within one month of such refusal apply to the chairperson of the board of appeal for leave to appeal against the determination, and advise the Ombud in writing accordingly.
- f) The application referred to in paragraph (e) must be submitted to the secretary of the board of appeal and must thereafter be dealt with as directed by the chairperson of that board.
- g) On receipt of the written advice referred to in paragraph (e), the Ombud must transmit to the secretary of the board of appeal all the records concerning the complaint together with a copy of the determination and the Ombud's reasons therefor, and the Ombud's reasons for refusing leave to appeal.
- h) If the Ombud grants leave to appeal, the applicant must be advised accordingly and the provisions of paragraph (g) apply with the necessary amendments, in which case the Ombud must also transmit the reasons for granting leave to appeal (if any).
- i) When granting or refusing leave to appeal, the Ombud must advise the other party to the proceedings of the outcome of the application for leave to appeal.
- j) If the board of appeal becomes seized with the appeal, the appeal must be dealt with in terms of the rules applicable to that board, with the necessary amendments, and, unless requested by the board of appeal, the Ombud shall not take part in the appeal proceedings and the appeal will continue between the parties to the complaint.
- k) On receipt of the final decision of the board of appeal the Ombud must forward the decision to the clerk or commissioner of the court as contemplated in section 28(4) of the Act.

Internal complaint resolution system

Granate will make sure that all team members handling complaints:

- have the necessary knowledge, experience and skills;
- have access to the information they need;
- are not subject to a conflict of interest;
- have access to any training they need; and
- are empowered to make impartial decisions or recommendations.

Our Head of Clients will review all complaints received to determine how we can improve our service and systems in future. He will report on these reviews to the Executive Committee as-and-when he carries them out, and to the Board of Directors quarterly.

Applicable legislation

The Financial Advisory and Intermediary Services (FAIS) Act, No. 37 of 2002

Definition of a complaint

"**complaint**" means an expression of dissatisfaction by a person to a provider or, to the knowledge of the provider, to the provider's service supplier relating to a financial product or financial service provided or offered by that provider which indicates or alleges, regardless of whether such an expression of dissatisfaction is submitted together with or in relation to a client query, that

(a) the provider or its service supplier has contravened or failed to comply with an agreement, a law, a rule, or a code of conduct which is binding on the provider or to which it subscribes;

(b) the provider or its service supplier's maladministration or wilful or negligent action or failure to act, has caused the person harm, prejudice, distress or substantial inconvenience; or

(c) the provider or its service supplier's has treated the person unfairly;

Maintenance of records - Chapter V: Duties of Authorised Financial Service Providers

Section 18 (b): An authorized financial services provider must, except to the extent exempted by the registrar, maintain records for a minimum of five years regarding complaints received together with an indication whether or not such complaint has been resolved.

FAIS General Code of Conduct for Authorised Financial Service Providers on record keeping

Section 17(7)(c): A provider must maintain the following data in relation to reportable complaints categorised in accordance with subsection (4) on an ongoing basis

- (i) number of complaints received;
- (ii) number of complaints upheld;
- (iii) number of rejected complaints and reasons for the rejection;
- (iv) number of complaints escalated by complainants to the internal complaints escalation process;
- (v) number of complaints referred to an ombud and their outcome;
- (vi) number and amounts of compensation payments made;

- (vii) number and amounts of goodwill payments made; and
- (viii) total number of complaints outstanding.

FAIS General Code of Conduct for Authorised Financial Service Providers and Representatives

Section 17 (8): A Provider must –

- (a) make sure that its complaint processes and procedures are transparent, visible and accessible through channels that are appropriate to the provider's clients.
- (b) may not impose any charge for a complainant to make use of complaint processes and procedures.
- (c) make sure all communications with a complainant be in plain language.
- (d) wherever feasible, provide clients with a single point of contact for submitting complaints.
- (e) disclose to a client
 - (i) the type of information required from a complainant;
 - (ii) where, how and to whom a complaint and related information must be submitted;
 - (iii) expected turnaround times in relation to complaints; and
 - (iv) any other relevant responsibilities of a complainant.
- (f) within a reasonable time after receipt of a complaint acknowledge receipt thereof and promptly inform a complainant of the process to be followed in handling the complaint, including
 - (i) contact details of the person or department that will be handling the complaint;
 - (ii) indicative and, where applicable, prescribed timelines for addressing the complaint;
 - (iii) details of the internal complaints escalation and review process if the complainant is not satisfied with the outcome of a complaint;
 - (iv) details of escalation of complaints to the office of a relevant ombud and any applicable timeline; and
 - (v) details of the duties of the provider and rights of the complainant as set out in the rules applicable to the relevant ombud.
- (g) keep complainants adequately informed of
 - (i) the progress of their complaint;
 - (ii) causes of any delay in the finalisation of a complaint and revised timelines; and
 - (iii) the provider's decision in response to the complaint.

Annexure A- Complaints Register Template

Date	Name and surname of client	Contact details	Nature of complaint	Categorisation of complaint	Person assigned to for response	Actions taken to resolve complaint	Appropriately resolved or dealt with, within allocated timeframe	Comments on inherent risk and how it may be prevented in the future