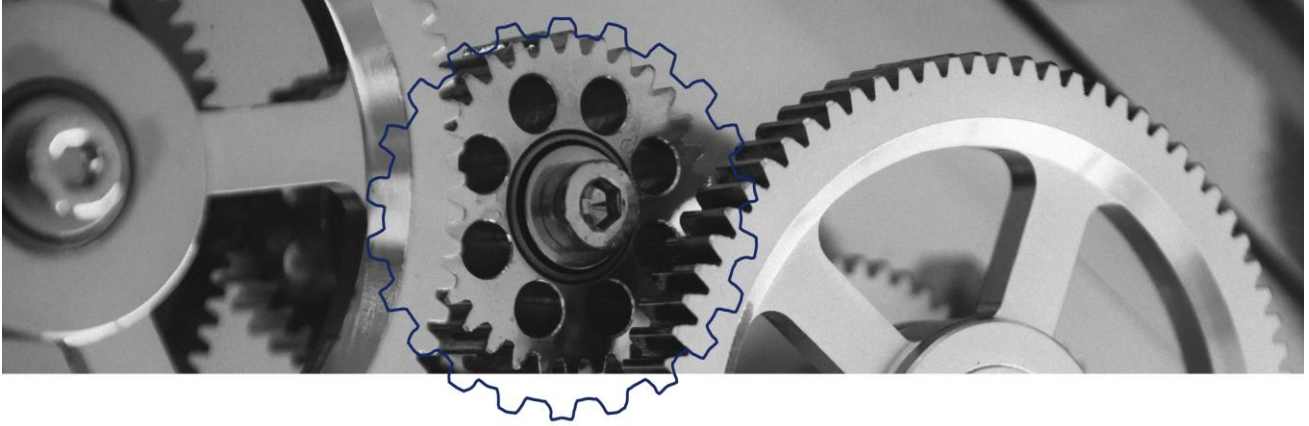


COMPLAINTS POLICY AND REGISTER



BRIDGE FUND MANAGERS HOLDINGS (PTY) LTD ('BFMH')

(Includes Bridge Fund Managers (Pty) Ltd and Bridge Collective Investments (RF) (Pty) Ltd as well as all the other subsidiaries of Bridge Fund Managers Holdings (Pty) Ltd)

1. Complaints Policy

We, the BFMH staff are committed to:

- 1.1 Resolving client complaints in a timely manner, which we believe is fair to our clients, our business and our staff.
- 1.2 Ensuring that clients have full knowledge of the procedures established for internal resolution of their complaint, details of which will be given to them in writing.
- 1.3 Ensuring easy access to our complaints resolution facilities at any of our offices, or by way of post, telephone or electronic help desk support.
- 1.4 Employing and empowering properly trained people in our business to deal with complaints, as well as with the escalation and follow-up of serious non-routine complaints.
- 1.5 Each complaint receiving proper consideration in a process that is managed appropriately and effectively.
- 1.6 Offering full and appropriate redress in all cases where a complaint is resolved in favour of a client – without delay.
- 1.7 Informing clients of their right to refer their complaints to the FAIS Ombud should a complaint not be resolved to their satisfaction within 20 working days from the date on which the complaint is received.

- 1.8 Should the complaint allege interference with the protection of personal information, the client may approach the Information Officer. A complaint may be dealt with in section 3 below or according to guidelines issued by Information Regulator whichever is applicable. This however may not limit or restrict the ability of the complainant to lodge a complaint with the Information Regulator should they wish to do so.
- 1.9 Maintaining records of all complaints received for a period of five (5) years, which will specify whether or not complaints were resolved.
- 1.10 Implementing follow-up procedures to:
 - 1.10.1 Ensure the avoidance of occurrences giving rise to complaints; and
 - 1.10.2 Improve services and complaint systems and procedures where necessary.

2. Definitions

- 2.1 “Act” means Financial Advisory and Intermediary Services Act (‘FAIS’) and/or Collective Investments Schemes Control Act (‘CISCA’) and/or Protection of Personal Information Act (‘POPI’).
- 2.2 “Complaint” means a specific complaint relating to a financial service rendered to (or personal information obtained from) a client on or after the date of commencement of the Act, alleging that the business has:
 - 2.2.1 Contravened or failed to comply with a provision of the Act and that, as a result, the client has suffered or is likely to suffer financial prejudice or damage;
 - 2.2.2 Willfully or negligently rendered a financial service to the client which has caused prejudice or damage to the client or which is likely to result in such prejudice or damage;
 - 2.2.3 Treated the client unfairly; or
 - 2.2.4 compromised his/her personal information
- 2.3 “Manager” means Bridge Collective Investments (RF) (Pty) Ltd.

3. Complaints procedure

We deal with a complaint as follows:

- 3.1 We can receive complaints from clients (in writing and with the accompanying documentation) in the following ways:
 - Email: compliance@bridgefm.co.za
 - Fax: 031 – 571 0505 for attention The Compliance Officer/Complaints
 - Post: PO Box 3211, Durban, 4000 for attention The Compliance Officer/Complaints
- 3.2 Log the date and contents of the complaint in the Complaints Register.
- 3.3 If a complaint is not in writing, ask the client to lodge the complaint to writing and request the client to include any relevant documentation or information.

- 3.4 Acknowledge receipt of the complaint in writing within three (3) business days of receipt, and give the client the name(s) and contact details of the staff responsible for the resolution of the complaint.
- 3.5 Investigate the complaint to ascertain whether the complaint can be resolved immediately.
- 3.6 If the complaint can be resolved immediately, take the necessary action and advise the client accordingly.
- 3.7 If the complaint cannot be resolved immediately, send the client a written summary of the steps to be taken to resolve the matter and the expected date of resolution.
- 3.8 If unable to resolve the complaint within 20 (twenty) business days of logging the complaint in the Complaints Register, notify the client accordingly and advise the client of his / her right to:
- 3.8.1 Proceed in terms of Rule 6 (a) and 6 (b) of the Rules on Proceedings of the Office of the Ombud for Financial Services Providers (see Annexure A); or
- 3.8.2 Seek legal redress in another forum.
- 3.9 Update the register with all developments/activities.

VERSION	DATE	APPROVED	AMENDMENTS
1	18 November 2013	GFS and BFMH Board	
2	11 February 2014	GFS and BFMH Board	
3	04 November 2015		Reference to GFS Holding (Pty) Ltd substituted with Grindrod Asset Management Holdings; incorporated complaints pertaining to misuse of personal information
4	26 January 2017		Replacement of Grindrod Asset Management (Pty) Ltd and Grindrod Collective Investments (RF) (Pty) Ltd with Bridge Fund Managers (Pty) Ltd and Bridge Collective Investments (RF) (Pty) Ltd respectively.
5	September 2017		Name change

4. Annexure A

This is a guideline for the Managers, which would be applied as if the Manager concerned was an authorised Financial Services Provider. Rules on Proceedings of the Office of the Ombud for Financial Services Providers - Rule 6 (a) and 6 (b) of the

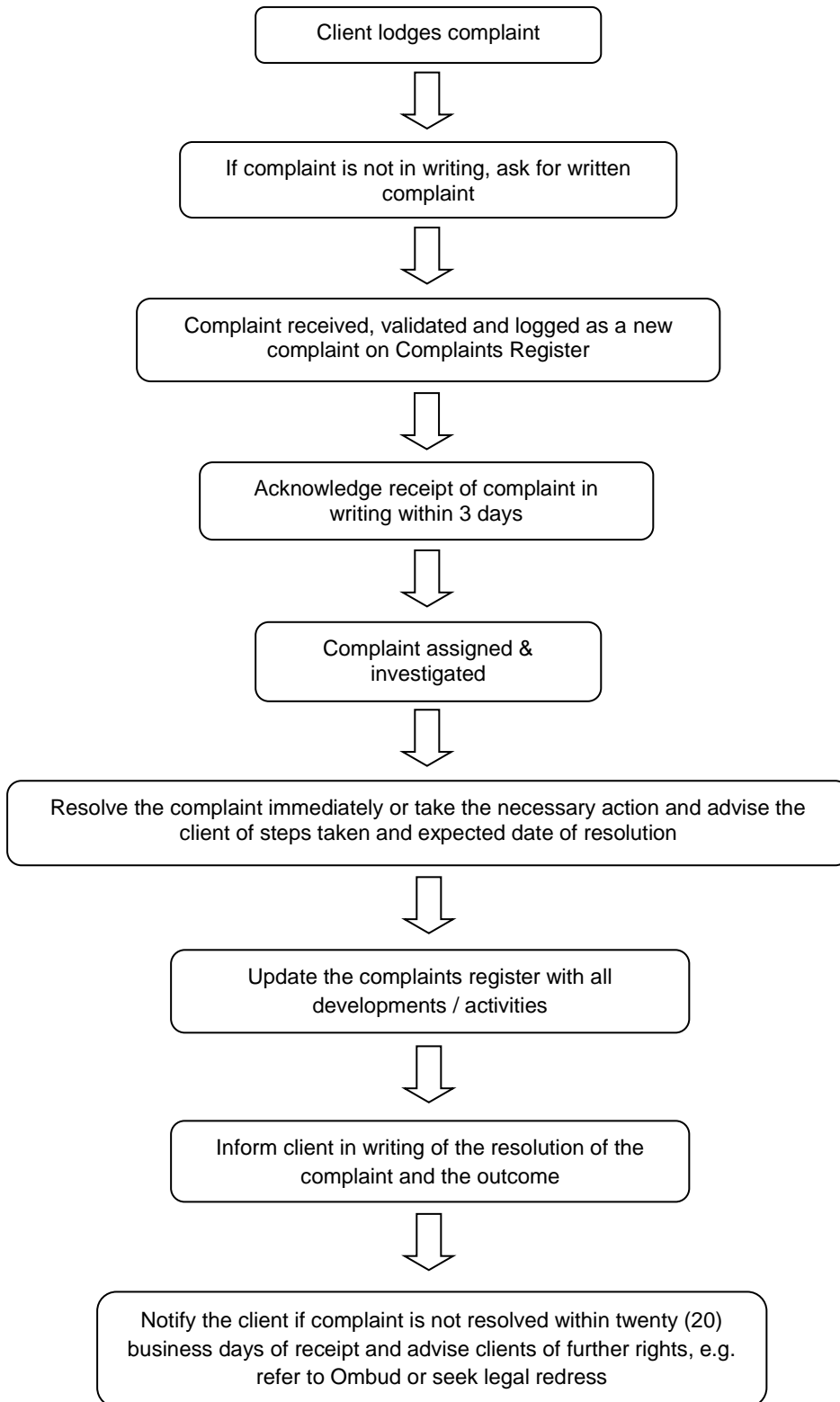
- 6 (a) Where a complaint cannot within three (3) weeks be addressed by the responding party (provider), the responding party must as soon as reasonably possible, send to the complainant a written acknowledgement of the complaint with contact references of the responding party.
- 6 (b) If within six (6) weeks of receipt of a complaint the responding party has been unable to resolve the complaint to the satisfaction of the client, the responding party must inform the complainant :
- (i) The complaint may be referred to the Office (of the Ombud for Financial Services Providers) if the complainant wishes to pursue the matter; and
 - (ii) The complainant should do so within six (6) months of receipt of such notification.

Contact details of the FAIS Ombud:

Tel: 012-470 9080
Fax: 012-348 3447
Email: info@faisombud.co.za
Postal Address: PO Box 74571
Lynwood Ridge
0040
Website: www.faisombud.co.za

5. Annexure B

Complaints Process Flow



Annexure C

Complaints Register

The register must contain the following fields:

Received: This field will reflect the date on which the letter was received. The receipt period starts its calculations here.

Date Captured: The date of the day on which the complaint is captured.

Received From: The name and designation of the person that submitted the complaint must be entered in here. It may be a client or a client's representative.

Product: The product involved if any.

Complaint Reference Number: This field contains the client's reference number linked to the Policy number.

Client Surname and Initials: Enter the surname of the client making the complaint.

Complaint Description / Type: Short summary of the complaint.

Captured By: The name of the person who captured the complaint.

Responsible Person: Who will deal with the complaint and ensure that it is resolved.

Activity Update: Log all developments and movements.

Outcome of Complaint: Summary of what decision was taken.

Date of Final Communication to Client: Date of letter to the client.

Learnings: This is a field where any possible lessons learned from the handling of this complaint can be entered.

