

COMPLAINTS POLICY ("THE POLICY")

POLICY CONTROL	
Version	4
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1 INTRODUCTION

Old Mutual Investment Group (Pty) Ltd is an authorised financial services provider (“**FSP**”) in terms of the Financial Advisory and Intermediary Services Act (“**FAIS**”) and as such has a responsibility to conduct itself with integrity, fairness and dignity and act in an ethical manner in all its dealings with the public, customers and other industry participants.

2 WHY WE NEED A POLICY

With this Policy we seek to ensure that our customers are given the highest standard of service in resolving complaints.

Further, the FAIS General Code of Conduct (“**the Code**”) requires every FSP to maintain and manage an internal complaints resolution system and procedures to ensure resolutions of complaints.

3 PURPOSE OF THIS POLICY

The purpose of this Policy is to set out the parameters for managing any complaints, defined below, received from a client. It reflects Old Mutual Investment Group’s commitment to maintain and manage an internal complaints resolution system and procedures. Compliance with this Policy is to ensure that when a complaint is received that it is managed, recorded and responded to within the required regulatory timeline.

4 APPLICATION OF THIS POLICY

This Policy will apply in all instances where a complaint arises out of a financial service rendered by a representative or a Financial Services Provider in terms of FAIS.

This Policy applies to the below entities:

- Old Mutual Investment Group (Pty) Limited;
- Old Mutual Alternative Investments (Pty) Limited
- Old Mutual Customised Solutions (Pty) Limited;
- Old Mutual Property (Pty) Limited;
- Futuregrowth Asset Managers (Pty) Limited; and
- Marriott Asset Management (Pty) Limited.

5 WHAT IS A COMPLAINT UNDER FAIS?

A 'complaint' is a specific complaint relating to a financial service rendered by a financial services provider and in which it is alleged that the provider or its representative:

- 5.1 contravened a provision of FAIS and caused (or will cause) the complainant to suffer financial prejudice or damage;
- 5.2 has wilfully or negligently rendered a service that has caused (or will cause) financial prejudice or damage; and/or
- 5.3 has treated the complainant unfairly.

6 HOW TO LODGE A COMPLAINT

- 6.1 A complaint must be submitted in writing to Old Mutual Investment Group either by hand, post, fax or email. Contact details are provided below.
- 6.2 As soon as a complaint is received, Old Mutual Investment Group will acknowledge receipt thereof in writing.
- 6.3 The complaint should contain sufficient detail and must include:
 - 6.3.1 the name of the client and details of the client's investment;
 - 6.3.2 the full name, ID number and contact details of the complainant as well as proof of authority to act on behalf of the client; and
 - 6.3.3 specific details about the nature of the complaint, which would include sufficient facts, dates and supporting documentation to enable Old Mutual Investment Group to deal with the complaint quickly and fairly.

7 HOW OLD MUTUAL INVESTMENT GROUP WILL MANAGE THE COMPLAINT

- 7.1 Old Mutual Investment Group will acknowledge receipt of your complaint in writing as soon as possible.
- 7.2 Old Mutual Investment Group will take steps to investigate the complaint and attempt to resolve the complaint within six weeks of receipt thereof.
- 7.3 Internal follow up procedures will be put in place to ensure avoidance of

occurrences giving rise to such complaints and for improving our services.

- 7.4 In the event that the complaint cannot be resolved, Old Mutual Investment Group will advise the complainant in writing the reasons why the complaint could not be resolved and what further steps are available to the complainant.
- 7.5 Old Mutual Investment Group will keep records of all complaints for five years and maintain a complaints register.

8 REFERRAL TO THE OMBUDSMAN

If Old Mutual Investment Group has not resolved a complaint within 6 weeks, or where the complaint has been dismissed or where the client is not satisfied with the results of the investigation into the complaint, the client may, within 6 months, refer the complaint to the Ombudsman whose details is as follows:

FAIS Ombud

Name:	Ms Noluntu Bam
Postal Address:	PO Box 74571 Lynwood Ridge 0040
Telephone:	+27 12 470 9080
Fax :	+27 12 348 3447
E-mail:	info@faisombud.co.za

9 EMPLOYEE OBLIGATIONS

In the event that you receive a complaint directly from a client, it is imperative you forward such complaint to the Head: Compliance. The procedure for dealing with complaints is set out in Chapter 12 of the Compliance Manual, which is available on the Old Mutual Investment Group Intranet (<http://workspaces/Compliance1/Forms/AllItems.aspx>).

10 HOW TO CONTACT OLD MUTUAL INVESTMENT GROUP

All complaints should be addressed to:

Head: Old Mutual Investment Group Compliance

Postal Address	PO Box 878 Cape Town 8000
Telephone	+27 21 509 2570
Fax :	+27 21 504 7457
Email:	compliance@oldmutualinvest.com

11 ACCESS TO THIS POLICY

This Policy is available on the Old Mutual Investment Group Intranet or directly from any member of the Compliance Team.

12 APPROVAL OF POLICY

This Policy was approved and resolved to be adopted at a meeting of the Board on 18 May 2012.