

COMPLAINTS POLICY AND REGISTER

GRINDROD BANK LIMITED ('BANK')

(Including subsidiaries)

JUNE 2020

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1 COMPLAINTS POLICY

The Bank is 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 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 in the following manner:
 - 1.7.1 Ombud for Banking Services
If their complaint deals with a banking service and is not resolved to their satisfaction within 20 business days from the date on which the complaint is received.
 - 1.7.2 FAIS Ombud
If their complaint regards a contravention of the FAIS Act (refer section 2) and is not resolved within 20 business days from the date on which the complaint is received.
 - 1.7.3 Information Regulator
If the complaint alleges interference with the protection of personal information, the client may approach the Information Regulator. A complaint may be dealt with in terms of a code of conduct (not as yet established by the Regulator) which appoints an adjudicator to deal with complaints. 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.
 - 1.7.4 National Consumer Commission
If the complaint deals with other consumer-type complaints dealt with in terms of the Consumer Protection Act.

- 1.8 Maintaining records of all complaints received for a period of 5 years, which will specify whether or not complaints were resolved.
- 1.9 Implementing follow-up procedures to:
 - 1.9.1 Ensure the avoidance of occurrences giving rise to complaints; and
 - 1.9.2 Improve services and complaint systems and procedures where necessary.

2 DEFINITION OF A COMPLAINT

A “complaint” in terms of the FAIS Act means a specific complaint relating to a financial service (i.e. advice or intermediary service) rendered to a client by a financial service provider on or after the date of commencement of the FAIS Act, alleging that the business has:

- 2.1 Contravened or failed to comply with a provision of the FAIS Act and that, as a result, the client has suffered or is likely to suffer financial prejudice or damage;
- 2.2 Wilfully 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; or
- 2.3 Treated the client unfairly.

A client may also lodge a complaint if the client believes that the processing of personal information has not been lawful. While the complaint may involve the Protection of Personal Information Act, the complaint must be submitted in the same manner as any other complaint.

A ‘complaint’ in terms of the Consumer Protection Act means a person who has filed a complaint with the Commission in terms of section 71 of that Act or the Commission in respect of a complaint that it has initiated, either directly or at the direction of the Minister or request of a provincial consumer protection authority.

3 COMPLAINTS PROCEDURE

- 3.1 We can receive complaints from clients (in writing and with the accompanying documentation) in the following ways:
 - Email: compliance@grindrodbank.co.za
 - Fax: 031 – 571 0505 for attention The Compliance Officer/Complaints
 - Post: PO Box 3211, Durban, 4000 for attention The Compliance Officer/Complaints

We deal with a complaint as follows:

- 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 in writing and to include any relevant documentation or information. If the client is unable to lodge the complaint in writing (due to, for example, illiteracy) the Bank must provide reasonable assistance to the complainant by obtaining the relevant information in order to deal with the complaint.
- 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. If the complaint relates to a banking service/product, an update must be given within 14 business days of receipt of the complaint.
- 3.8 If unable to resolve a complaint within 20 business days of logging the complaint in the Complaints Register or if you are not satisfied with the outcome, notify the client of his/her right to use the services of the Ombudsman or seek legal redress in another forum as outlined in Annexure A.
- 3.9 Update the register with all developments/activities.

4 TREATING CUSTOMERS FAIRLY

In addition to the Bank being committed to resolving client's complaints, the Bank is also committed to Treating Customers Fairly ('TCF'). TCF is an outcome based regulatory and supervisory approach designed to ensure that specific fairness outcomes for consumers of financial services are delivered by financial institutions.

The Bank has considered Outcome 6 which states that "consumers do not face unreasonable post-sale barriers imposed by companies to change product, switch provider, submit a claim or make a complaint". This complaints policy demonstrates this outcome by ensuring consumers will not face barriers when making a complaint

Revision No. 8 Previous review: November 2019 Last review date: May 2020	Custodian: Compliance	Review and recommend for approval: Audit and Compliance Committee	Approval: Grindrod Bank Board 2020 06 02
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5 ANNEXURE A

The Ombudsman for Banking Services handles complaints in terms of the Code of Banking Practice and its Terms of Reference.

Section 3 - The Ombud's Jurisdiction

3.1 Eligible complainants

The OBS may consider a dispute brought by or on behalf of a customer or prospective customer of a bank who is:

- (a)..
- (l) has tried unsuccessfully to resolve the dispute through approaches to the Bank's management or its internal complaints handling section or the complaint has been repudiated, or there has been an undue delay by the Bank in resolving the complaint.

The Ombud office requires that a Bank resolve the complaint within 20 business days failing which the matter can be taken to its office.

Contact details of the Ombud for Banking Services:

- Tel: 011- 712 1800 0860
- Sharecall: 0860 800 900
- Email: info@obssa.co.za
Physical address: 34 and 36 Fricker Road, Ground Floor, Illovo, 2041
- Website: www.obssa.co.za

Rule 6(a) and 6(b) of the Rules on Proceedings of the Office of the Ombud for Financial Services Providers.

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|-------|--|
| 6 (a) | Where a complaint cannot in a reasonable time 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:
<p>(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</p> <p>(ii) The complainant should do so within six months of receipt of such notification.</p> |

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

For credit related complaints

The Credit Ombudsman (credit bureau listing and debt review complaints)

Fernridge Office Park
Hunter Street
Ferndale
Randburg
PO Box 805
Pinegowrie 2123

Call centre: 0861 OMBUDS (0861 662 837)

Fax: 086 674 7414

Email: ombud@creditombud.org.za

The National Credit Regulator (Regulator for credit related matters)

127 - 15th Road

Randjespark

Midrand

Tel: +27 11 554 2600

Toll Share: 0860 627 627 / 0860 NCR

email: complaints@ncr.org.za.

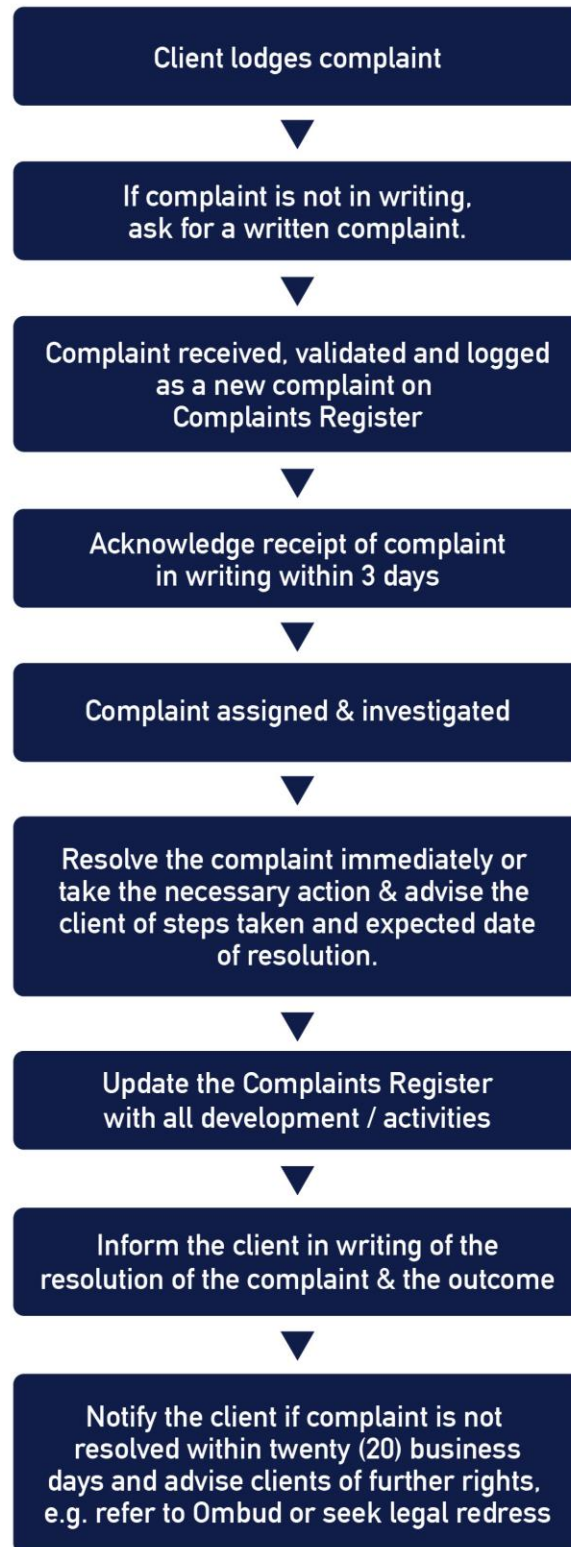
For complaints about debt counselling email info@ncr.org.za

National Consumer Commission complaints call centre: 012 428 7000

Switchboard: 012 428 7726

E-mail: complaints@thenc.org.za

6 ANNEXURE B



7 ANNEXURE C

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 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 client's account number or client 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.

REC	DATE CAPT	RECEIVED FROM	PRODUCT	COMP REF NO.	CLIENT SURNAME AND INITIALS	COMPLAINT DESCRIPTION/TYPE	CAPT BY	RESP PERSON	ACTIVITY UPDATE	OUT COME	DATE COMM. TO CLIENT	LEARNNGS