

Bravura Complaints Policy

Version 2.0

26 April 2019

BRAVURA
COMPLAINTS POLICY

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The resolution of client complaints is governed by the Financial Advisory and Intermediary Services Act No.37 of 2002 ("FAIS / the FAIS Act").

A. DEFINITION OF A COMPLAINT

A complaint means a specific complaint relating to a financial service rendered by a financial services provider or a representative to a client/the complainant and in which complaint it is alleged that the provider or representative:

- i. contravened or failed to comply with a provision of the FAIS Act and that, as a result thereof, the complainant has suffered or is likely to suffer financial prejudice or damages;*
- ii. wilfully or negligently rendered a financial service to the complainant which has caused prejudice or damage to the complainant, or which is likely to result in such prejudice or damage; or*
- iii. treated the complainant unfairly; or*
- iv. compromised the complainant's personal information.*

In summary, a client can lodge a complaint as a result of the financial services Bravura provide to the client, if the client has suffered or is likely to suffer financial prejudice or damages, where Bravura has:

- i. breached the FAIS Act;
- ii. wilfully or negligently provided a financial service that has or is likely to cause financial prejudice or damages; or
- iii. treated the client unfairly in providing the financial service.

B. COMPLAINTS POLICY

Bravura is committed to:

- i. resolving client complaints in a timely and fair manner, taking into consideration the interests of clients and Bravura's business and staff;
- ii. ensuring that clients have full knowledge of the procedures established for the internal resolution of their complaints, details of which will be given to them in writing;
- iii. ensuring easy access to the complaint resolution facilities at Bravura's offices, or by way of email, post or telephonic support;
- iv. employing and empowering properly trained people in the business to properly deal with complaints, as well as with the escalation and follow-up of non-routine complaints;
- v. ensuring that each complaint receives proper consideration in a process that is managed appropriately and effectively;

- vi. offering full and appropriate redress, without delay, in all cases where a complaint is resolved in favour of a client;
- vii. informing clients of their right to refer their complaint to the FAIS Ombud should a complaint not be resolved by Bravura to their satisfaction within six weeks from the date on which the complaint is received by Bravura;
- viii. maintaining records of all complaints received for a period of five years, which records will specify whether or not a complaint was resolved;
- ix. implementing follow-up procedures to ensure the avoidance of occurrences giving rise to complaints; and
- x. improving services and complaint systems and procedures where necessary.

C. CENTRAL POINT OF CONTACT

The central point of contact for all FAIS Act complaints relating to Bravura is the Compliance Officer.

All complaints must be submitted in writing, as oral complaints do not fall within the ambit of the FAIS Act.

Clients must be informed that they have the right to contact the FAIS Ombud regarding any unresolved complaints. Bravura is obligated to provide the client with the contact details of the FAIS Ombud.

D. COMPLAINT RESOLUTION PROCESS

Step 1	Receive the client's complaint in writing, with accompanying documentation.
Step 2	Log the client's complaint in the complaints register.
Step 3	If a complaint is not in writing, ask the client to lodge the complaint in writing and request the client to include any relevant documentation or information.
Step 4	Acknowledge receipt via email within 5 days after receipt. Inform the client that Bravura will attempt to resolve the complaint within 6 weeks.
Step 5	Investigate the complaint to ascertain whether the complaint can be resolved immediately.
Step 6	If the complaint can be resolved immediately, take the necessary action and advise the client accordingly.
Step 7	If resolved, then inform the client of the resolution via email.
Step 8	If not resolved, provide the client with the full contact details and process for escalation to the FAIS Ombud.
Step 9	Inform the client if Bravura is unable to resolve their complaint within six weeks. <ul style="list-style-type: none"> • Provide reasons for the delay. • Attempt to negotiate an extension.
Step 10	Update the complaints register with all developments/activities.

E. ESCALATION OF A COMPLAINT TO THE OFFICE OF THE OMBUD FOR FINANCIAL SERVICES PROVIDERS

A client may escalate a complaint to the Ombud for Financial Services Providers (“FAIS Ombud”) in any of the following circumstances:

1. Bravura fails to acknowledge the receipt of the complaint.
2. Bravura fails to resolve the complaint within the required six week timeframe.
3. Bravura fails to resolve the complaint within the extended timeframe that has been negotiated.
4. The client feels that the resolution of the complaint is not fair and reasonable.
5. The client feels that the level of redress is not fair and reasonable.

F. PROCEDURE FOR ESCALATION

Bravura must inform the client of the following key points in terms of the process that they must follow to escalate a complaint to the FAIS Ombud:

1. They must submit the complaint to the FAIS Ombud in writing, or where it is deemed appropriate by the FAIS Ombud in a manner which conveys the complaint in a comprehensible form.
2. Where necessary the complaint must be accompanied by available documentation in the client’s possession.
3. They must submit the complaint to the FAIS Ombud within six months after receipt of Bravura’s resolution notification.

G. CONTACT DETAILS

BRAVURA

Email	compliance@bravura.net
Address	The Head of Compliance 23 Fricker Road Ground Floor, Suite 2 Illovo 2196

FAIS OMBUD

Email	info@faisombud.co.za
Telephone	+27 12 470 9080
Address	FAIS Ombud Eastwood Office Park Baobab House, Ground Floor Lynnwood Ridge 0081

ANNEXURE A**COMPLAINTS PROCESS FLOW**