



westbrooke

Alternative Asset Management

Complaints Policy

1. Application

This Policy applies to the following Financial Services Providers, and its Representatives, within the Westbrooke Group of companies:

- Westbrooke Alternative Asset Management (Investment Manager)
- Westbrooke Alternative Rental Income Assets Ltd
- Westbrooke Capital Hospitality Ltd
- Westbrooke Aria 2018 Ltd
- Westbrooke Stac 2018 Ltd
- Westbrooke Alto 2018 Ltd
- Westbrooke Aria 2019 Ltd
- Westbrooke Stac 2019 Ltd
- Westbrooke Host 2019 Ltd
- Westbrooke Aria Plus 2019 Ltd
- Westbrooke Aria 2020 Ltd
- Westbrooke Stac 2020 Ltd
- Westbrooke Aria Plus 2020 Ltd
- Westbrooke Aria 2022
- Westbrooke Stac 2021 (T/A Stac Preferred) Ltd
- Westbrooke Aria 2021 Ltd

Throughout this document, any reference to “Westbrooke” or “FSP’s” shall include the above entities collectively.

This document is a summary of the FSP’s Complaints policy. Please use the contact details below to request a copy of Westbrooke’s full complaints policy.

2. Complaints policy

Westbrooke has policies and processes in place to deal with Complaints received from its Clients. Our aim is to ensure that our complaints process is fair, transparent, accessible and visible to our Clients

Westbrooke is committed to:

- Thoroughly investigate complaints received in a timely manner
- Ensure fair treatment of Clients in line with the TCF principles
- To ensure that adequate communication is provided to the Client about how to complain, where to complain and to whom they can complain to and that this is performed in clear and understandable language
- Employing and empowering properly trained people in our business to deal with complaints, as well as with the escalation of serious complaints
- Informing clients of their right to refer their complaints to the FAIS Ombud should a complaint not be resolved to their satisfaction within six weeks from the date on which the complaint is received
- Maintaining records of all complaints received for a period of 5 years, which will specify whether or not complaints were resolved
- To put forward and manage possible solutions through corrective action improvements.

3. Definition of a complaint

“Complaint” means an expression of dissatisfaction by a complainant, relating to a product or service provided or offered by a financial institution, or to an agreement with the financial institution in respect of its products or services and indicating that -

- a) the FSP has contravened or failed to comply with an agreement, a law, a rule, or a code of conduct which is binding on the financial institution or to which it subscribes (e.g. FAIS);
- b) the FSP’s maladministration or wilful or negligent action or failure to act, has caused the complainant harm, prejudice, distress or substantial inconvenience; or
- c) the FSP has treated the complainant unfairly and regardless of whether such an expression of dissatisfaction is submitted together with or in relation to a customer query.

The Westbrooke Group categorise complaints as follows:

- Category 1- Regulatory Complaints as defined above, and Complaints which:
 - Relate to a material financial loss to a Client.
 - Relate to a material expectation gap with Clients.
 - Are not easily resolved
- Category 2- Other complaints not categorised as Category 1

4. Complaints procedure for Category 1 Complaints

Client:

Please follow these steps:

- 1) Contact Dino Zuccollo, Key Individual in writing (dino@westbrooke.co.za)
- 2) If the complaint is not resolved, contact Lawrence Barnett, Managing Director in writing (lawrence@westbrooke.com)

If you as a Client cannot settle your complaint with us, please refer it to the FAIS Ombud:

PO Box 74571, Lynnwood Ridge 0040, Tel 012 762 5000 // 086 066 3247
info@faisombud.co.za
www.faisombud.co.za

Westbrooke:

- 1) Log the date and contents of the complaint into the Complaints Register.
- 2) If a complaint is not in writing, ask the client to lodge the complaint in writing.
- 3) Acknowledge receipt of the complaint in writing within 5 business days of receipt
- 4) Investigate the complaint to ascertain whether the complaint can be resolved immediately.
- 5) If the complaint can be resolved immediately, take the necessary action and advise the client accordingly.
- 6) 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.
- 7) If unable to resolve the complaint within 3 weeks of logging the complaint with the Complaints Register, notify the client by means of a written acknowledgement. This will outline the current status of the complaint and the expected date of final resolution.
- 8) If unable to resolve the complaint within a further 3 weeks of the written acknowledgement (6 weeks since complaint logged), notify the client giving full written reasons as to why the outcome was not favourable, and advise the client of their right to seek legal redress by referring the complaint to the Office of the Ombudsman.
- 9) Notify the complainant that he/she has 6 months of receipt of such notification to refer the matter to the Financial Ombud. The Ombud's name, address and other contact details must be provided.
- 10) Update the register with all developments/activities.

5. Complaints procedure for Category 2 Complaints

Please follow these steps:

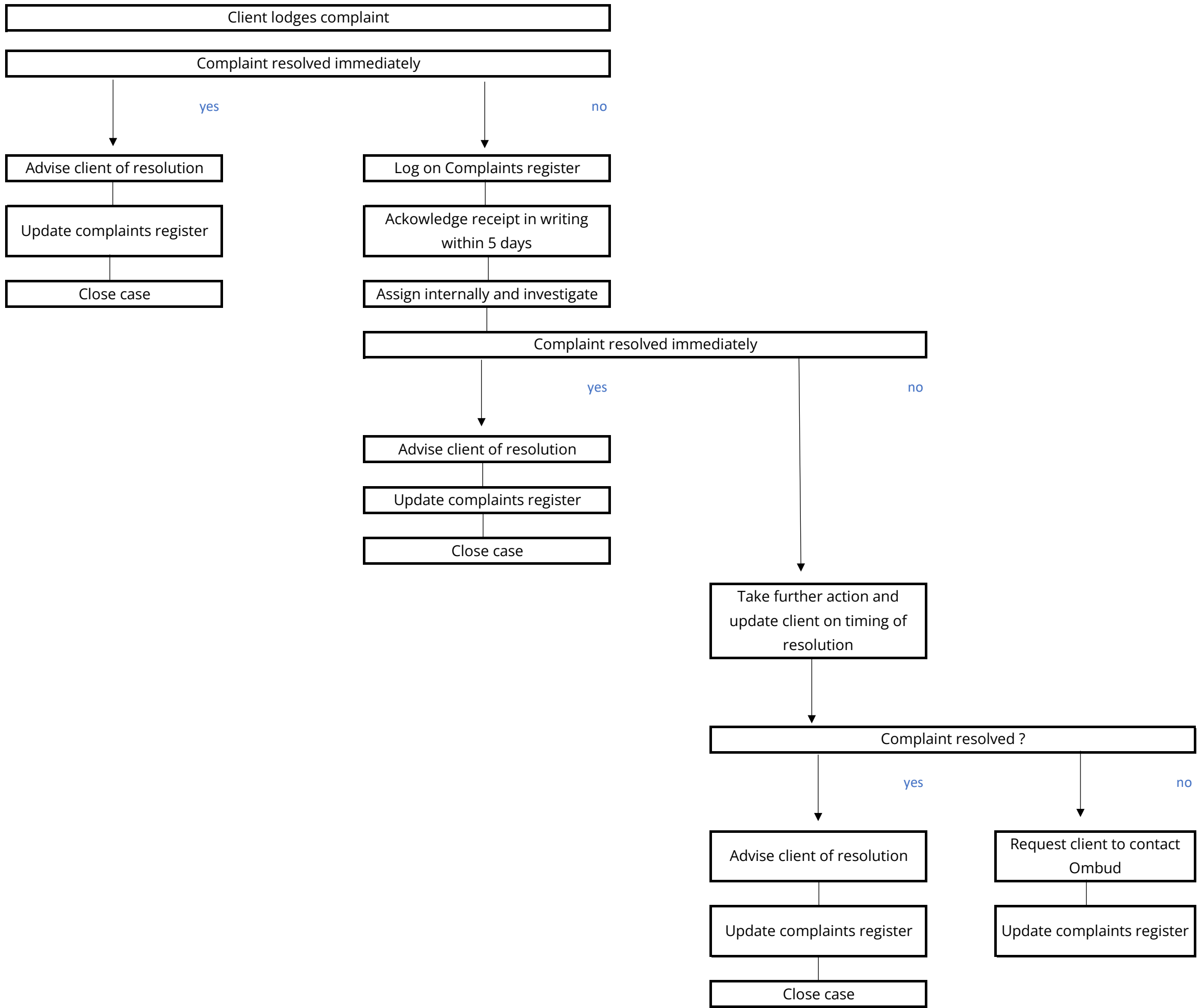
- 1) Send your Complaint in writing to the relevant operational team member that you are dealing with
- 2) If the complaint is not resolved, contact Dino Zuccollo, Key Individual in writing (dino@westbrooke.co.za)

Westbrooke:

- 1) If a complaint is not in writing, ask the client to lodge the complaint in writing.
- 2) Acknowledge receipt of the complaint in writing within 2 business days of receipt
- 3) Investigate the complaint to ascertain whether the complaint can be resolved immediately.
- 4) If the complaint can be resolved immediately, take the necessary action and advise the client accordingly.
- 5) 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.
- 6) If unable to resolve the complaint within 1 week notify the client by means of a written acknowledgement. This will outline the current status of the complaint and the expected date of final resolution.
- 7) If unable to resolve the complaint within a further week of the written acknowledgement (2 weeks since complaint logged), notify the client giving full written reasons as to why the outcome was not favourable, and advise the client of their right to seek legal redress by referring the complaint to the Office of the Ombudsman.

6. Process diagrams

CATEGORY ONE COMPLAINTS



CATEGORY 2 COMPLAINTS

