

# POPIA POLICY

## PROTECTION OF PERSONAL INFORMATION POLICY

BDO Wealth Advisers (Pty) Ltd – FSP No 4549

BDO Employee Benefits (Pty) Ltd – FSP No 15751

Herein after referred to as "BDO" for the purposes of this document

### 1. SCOPE

BDO is a responsible party as defined in the Protection of Personal Information Act 4 of 2013 (POPIA) and is obliged to comply with the provisions of this Act.

### 2. PURPOSE

POPIA requires BDO to inform data subjects (person(s) whose personal information it has access to) as to how Personal Information is used, disclosed, and destroyed.  
This Policy sets out how BDO deals with their data subjects' Personal Information and additionally for what purpose the said information is used.

### 3. BACKGROUND

Personal Information broadly means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly to a specific natural or juristic person (data subject).

### 4. POLICY

BDO guarantees its commitment to protecting their data subjects' privacy and ensuring their Personal Information is used appropriately, transparently, securely and in accordance with applicable laws.

#### THE POPIA PRINCIPLES THAT WE SUBSCRIBE TO:

1. Obtain and process information fairly.
2. Keep information only for one or more specified, explicit, and lawful purposes.
3. Use and disclose information only in ways compatible with these purposes.
4. Keep information safe and secure.
5. Keep information accurate, complete, and up to date.
6. Ensure that information is adequate, relevant, and not excessive.
7. Retain information for no longer than is necessary for the purpose or purposes.
8. Provide a copy of personal data kept to the data subject on request.

### 5. PROCEDURE

#### 5.1 PERSONAL INFORMATION COLLECTED

BDO will generally collect some of the following personal information from our data subjects:

- > Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic, or social origin, colour, age, physical or mental health, well-being, disability, language, and birth.
- > Information relating to the education, medical, financial, criminal or employment history.
- > Identifying number, name, symbol, e-mail address, physical address, telephone number, location information.
- > Biometric information (employees).
- > Correspondence sent/received that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence.
- > The views or opinions of another individual about our data subject.

We have agreements in place with all our products suppliers, and third-party service providers to ensure that there is a mutual understanding with regards to the protection of Personal Information.

We may also supplement the information provided with information we receive from other providers to offer a more consistent and personalised experience in clients' interaction with us.

#### 5.2 HOW PERSONAL INFORMATION IS USED

Personal Information will only be used for the purpose for which it was collected and agreed. This may include:

- > Providing a product / service to a data subject.
- > As part of employee on-boarding or any other internal human resources function.
- > Conducting credit reference searches or verification.
- > Confirming, verifying, and updating contact details.
- > For the detection and prevention of fraud, crime, money laundering or other malpractice.
- > For audit and record keeping purposes.

- > In connection with legal proceedings.
- > Providing our services to a data subject to carry out the services requested and to maintain and constantly improve the relationship.
- > Providing communications in respect of BDO and regulatory matters that may affect data subjects; and
- > In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.
- > To carry out the transaction(s) requested
- > For underwriting purposes
- > Assessing and processing claims.
- > For purposes of claims history.
- > Conducting market or customer satisfaction research.

In terms of the provisions of POPIA, Personal Information may only be processed if certain conditions are met, which are listed below, along with supporting information for FSP NAME processing for Personal Information:

- > Data subject consents to the processing – consent only required where the information will be used for something other than the intended use for which the information is supplied.
- > The processing is necessary.
- > Processing complies with an obligation imposed by law on BDO.
- > Processing protects the legitimate interest of the data subject.
- > Processing is necessary for pursuing the legitimate interest of BDO or of a third party to whom information is supplied.

### 5.3 DISCLOSURE OF PERSONAL INFORMATION

We may disclose a data subject's Personal Information for a reason it was not intentionally supplied for where we have a duty or a right to disclose in terms of the law or where it is may be necessary to protect our rights.

We have agreements in place to ensure that they comply with confidentiality and privacy conditions.

We may also share client Personal Information with and obtain information about clients from third parties for the reasons already discussed above.

### 5.4 SAFEGUARDING PERSONAL INFORMATION

It is a requirement of POPIA to adequately protect the Personal Information we hold and to avoid unauthorised access and use of your Personal Information. We will continuously review our security controls and processes to ensure that your personal Information is secure.

When we contract with third parties, we impose appropriate security, privacy, and confidentiality obligations on them to ensure that your Personal Information is kept secure.

We may need to transfer your (electronic) Personal Information to another country for processing or storage. We will ensure that anyone to whom we pass your personal information agrees to treat your information with a similar level of protection as afforded to you by us.

### 5.5 ACCESS AND CORRECTION OF PERSONAL INFORMATION

Data subjects have the right to access the Personal Information we hold about them. Data subjects also have the right to request us to update, correct or delete their Personal Information on reasonable grounds. Once a data subject objects to the processing of their Personal Information, BDO may no longer process said Personal Information. We will take all reasonable steps to confirm our data subject's identity before providing details of their Personal Information or making changes to their Personal Information. BDO's Management Team will be responsible for managing this process.

### 5.6 MANAGEMENT TEAM

THE DETAILS OF OUR MANAGEMENT TEAM ARE AS FOLLOWS:

Executive Director, Wealth Advisers Allan Heynen

Managing Director, Employee Benefits Cindy Frantzeskos

Chief Operating Officer, Wealth Advisers Olwethu Masanabo

Managing Director, Wealth Advisers Ricardo Teixeira

OUR MANAGEMENT TEAM IS CONTACTABLE AT OUR HEAD OFFICE:

Telephone Number: 011 488 1700

Physical Address: BDO, Wanderers Office Park, 52 Corlett Drive, Illovo, Johannesburg, 2196.

## 6. CONSEQUENCES OF NON-ADHERENCE

Staff members who do not treat the Personal Information of data subjects with the utmost confidentiality will be subject to disciplinary procedures.

## 7. TRAINING AND AWARENESS

Staff members will receive a copy of this policy on employment. Staff that deals with the Personal Information of data subjects will receive training on this policy.

## 8. APPROVAL AND REVIEW

This policy was approved by the Board of Directors during a meeting held on 15 April 2021, and will be reviewed as and when required.

## 9. VERSION CONTROL AND APPROVAL

Version	Date approved	Approved by	Notes
1.1	November 2020	Board of Directors	Reviewed Feb 2022.  Reviewed Nov 2023. Next review: Nov 2024  Reviewed Jan 2025. Next review: Jan 2026

# CLIENT COMPLAINT MANAGEMENT FRAMEWORK

BDO Wealth Advisers (Pty) Ltd – FSP No 4549

BDO Employee Benefits (Pty) Ltd – FSP No 15751

Herein after referred to as "BDO" for the purposes of this document

## 1. PURPOSE

Effective management of client complaints is a vital component of treating customers fairly. The purpose of this document is to provide all staff and partners with a consistent and comprehensive understanding of how to handle client complaints successfully to improve the services and status of our business and overall client experience.

It is important to record all complaints to ensure that we learn from the outcomes when we analyse complaints. The document recommends practical procedures and processes for reviewing and resolving client complaints in a courteous, timely, effective and fair manner, standards of which are aligned to the Complaints Management Discussion Document which forms part of the TCF Regulatory Framework. This document will be reviewed on an annual basis.

Effective management of client complaints is key to supporting our aim in which dissatisfied clients can be transformed into advocates or loyal supporters of our business which ultimately builds trust and lasting relationship sustainability.

In line with the TCF ('treating customer fairly') principle aims, we strive to raise standards in the way we operate, by introducing changes that will benefit our clients and increase their confidence in our brand.

Complaints Management is a key component of TCF Outcome 6 which provides that:

"Clients do not face unreasonable post-sale barrier imposed by firms to change product, switch providers, submit a claim or make a complaint."

This document serves as a guideline to achieve the following throughout the complaint management process:

- > To understand what constitutes a complaint (regulatory definition) so that there is a consistent understanding across the FSP. This is especially important when capturing complaints onto the system;
- > To set consistent standards and requirements for us to implement internal complaints management processes, including recordkeeping, monitoring and analysis;
- > To thoroughly investigate the complaint;
- > To identify possible service breakdowns;
- > To ensure fair treatment of clients in line with the TCF principles;

- > To make informed decisions;
- > To ensure timely resolution;
- > To conduct root cause analysis;
- > To put forward and manage possible solutions through corrective action improvements;
- > To ensure that our complaints process is fair, transparent, accessible and visible to our customer;
- > To ensure that adequate communication is provided to the customer about how to complain, where to complain and to whom they can complain to and that this is performed in clear and understandable language.

## 2. OUR APPROACH

BDO adopted a decentralised approach for dealing with client complaints; i.e. a central complaints team with representatives within the business units handling complaints for that specific environment.

The responsibility for handling specific complaints must be appropriately delegated to ensure efficient handling. Delegation should be to staff who are adequately trained and have an appropriate mix of experience, knowledge and skill in complaints handling, in the relevant complaints subject matter, in the principles of TCF, and in relevant legal and regulatory provisions. The FSP will always own the client complaint and the resolution thereof.

This Framework formalises the practices required for effective management and handling of client complaints within BDO. The objective is to ensure effective standards of complaints management to:

- > ensure fair outcomes for clients;
- > protect and enhance BDO's reputation;
- > allow for effective reporting, detailed analysis and identification of trends related to complaints;
- > achieve effective and timely resolution of complaints in respect of acceptable turn-around times;
- > provide guidelines for acknowledging complaints (and complainant communication) and for recording client complaints in a centralised manner;
- > improve organisational effectiveness through learning from client

feedback and root cause analysis;

- > ensure effective management of complaints, in line with this framework;
- > ensure effective engagement between the insurer and the relevant Ombudsman scheme;
- > ensure requirements are met for reporting to the Registrar and / or the public (if required);
- > restore and enhance relationships with complainants and non-complainants for the purpose of on-going business retention and growth;
- > ensure objectivity by the complaints handling staff in attending to and resolving a complaint.

This framework sets out BDO's philosophy concerning the way complaints are handled, resolved and maximized (maximized refers to conducting analysis of complaints for root cause analysis to ensure processes are improved to reduce complaints where necessary).

This framework will be reviewed by the Management Team at least annually.

This document is additionally informed by best practices relating to TCF Complaints Management processes as well as the following existing regulatory requirements:

- > TCF (Treating Customers Fairly);
- > FAIS Act and GCOC requirements (Financial Advisory and Intermediary Services Act 37 of 2002 and General Code of Conduct).

### 3. SCOPE OF APPLICATION

This document is a high-level, governance-based document which sets out the minimum standards and requirements for effective and compliant complaints management.

This document applies to all BDO service providers.

Each FSP/intermediary, through which BDO distributes its products, must ensure that they have a complaint management process that:

- > is proportionate to the nature, scale and complexity of their business and risks;
- > clearly sets out the responsibilities in relation to the handling and reporting of complaints;
- > is appropriate for their business model, policies, services, policyholders, and beneficiaries;
- > enables complaints to be considered after taking reasonable steps to gather and investigate all relevant and appropriate information and circumstances, with due regard to the fair treatment of complainants;
- > does not impose unreasonable barriers to complainants; and
- > is fully compliant with the Financial Advisory and Intermediary Services Act (FAIS as well as the Policy Holder Protection Rules (PPR's) (as amended).

This framework upholds the provisions of the FAIS Act as well as the General Code of Conduct, as amended.

### 4. DEFINITIONS

**ADVICE** - means, subject to subsection (3)(a) the FAIS Act, any recommendation, guidance, or proposal of a financial nature furnished, by any means or medium, to any client or group of clients:

- > in respect of the purchase of any financial product; or
- > in respect of the investment in any financial product; or
- > on the conclusion of any other transaction, including a loan or cession,

aimed at the incurring of any liability or the acquisition of any right or benefit in respect of any financial product; or

- > on the variation of any term or condition applying to a financial product, on the replacement of any such product, or on the termination of any purchase of or investment in any such product, and irrespective of whether such advice:
  - is furnished during or incidental to financial planning in connection with the affairs of the client;
  - or results in any such purchase, investment, transaction, variation, replacement, or termination being affected;
  - results in the purchase by the Complainant of any product based on the advice.

**COMPLAINANT** - is a person/ someone acting on their behalf, who has a direct interest in the agreement, policy, or service.

**COMPLAINT** - means an expression of dissatisfaction by a person to an insurer or, to the knowledge of the FSP, to the FSP's service provider relating to a policy or service provided or offered by that insurer which indicates or alleges, regardless of whether such an expression of dissatisfaction is submitted together with or in relation to a client query, that:

- > the FSP or its service provider has contravened or failed to comply with an agreement, a law, a rule, or a code of conduct which is binding on the insurer or to which it subscribes;
- > the FSP or its service provider's maladministration or wilful or negligent action or failure to act, has caused the person harm, prejudice, distress, or substantial inconvenience; or
- > the FSP or its service provider has treated the person unfairly.

**COMPLAINTS MANAGEMENT** – means the management of the entire lifecycle of a complaint. This commences with the ease of process for the client to lodge complaints and the associated communication. It includes the way complaints are handled, recorded, resolved and quality controlled; the way people involved in complaints management processes are managed and trained; the way decisions are made; the ways clients' trust is restored; the way the reports are compiled and analysed; and ultimately the way business learns from the feedback gleaned from complaints and takes corrective and proactive action accordingly.

**COMPLAINTS MANAGEMENT HEAD** - The individual appointed by Management to serve as head of the complaint's management function within BDO.

**COMPLAINTS REPORTING SYSTEM** - The set of electronic applications and related case management software used by BDO for recording, classifying, routing, escalating, and resolving individual complaints received by the business. In relation to the Complaints Management function, the system is used by the business to monitor, analyse, and report on BDO and / or cell owners' performance in relation to Complaints Management.

**COMPLAINTS HANDLING** - The process of attending to and resolving complaints including ongoing interaction with Complainants. It is expected that this process meets certain minimum standards.

**COMPLAINTS HANDLING STAFF** - Any person that is responsible for making decisions or recommendations in respect of complaints generally or a specific complaint must –

- > be adequately trained;
- > have an appropriate mix of experience, knowledge and skills in complaints handling, fair treatment of clients, the subject matter of the complaints concerned and relevant legal and regulatory matters;
- > not be subject to a conflict of interest; and



- > be adequately empowered to make impartial decisions or recommendations.

**COMPENSATION PAYMENT** - means a payment, whether in monetary form or in the form of a benefit or service, by or on behalf of an insurer to a complainant to compensate the complainant for a proven or estimated financial loss incurred as a result of the insurer's contravention, non-compliance, action, failure to act, or unfair treatment forming the basis of the complaint, where the insurer accepts liability for having caused the loss concerned, but excludes any:

- > goodwill payment;
- > payment contractually due to the complainant in terms of a policy; or
- > refund of an amount paid by or on behalf of the complainant to the insurer where such payment was not contractually due.

**GOODWILL PAYMENT** - means a payment, whether in monetary form or in the form of a benefit or service, by or on behalf of an insurer to a complainant as an expression of goodwill aimed at resolving a complaint, where the insurer does not accept liability for any financial loss to the complainant because of the matter complained about.

**ESCALATED COMPLAINTS PROCESS** – The requirement of an escalated complaint dispute process is dealt with in section 6 of this document.

This is the process where the complainant is not happy with the initial outcome reached by BDO and wants an independent review of the complaint outcome.

**EVIDENCE** - means the information BDO has obtained to review, adjudicate and resolve a complaint and shall include all information submitted by an entity as well as from the Complainant and shall be stored and recorded on the complaints management system or other repositories for storing and recording information. This shall include, but is not limited to, claims forms, administration documentation, sales and other recordings, application forms, policy documentation, premium payment history etc.

**FAIS COMPLAINT / OMBUD** - means a specific complaint, submitted by a Complainant to the FAIS Ombudsman or BDO for purposes of resolution by BDO, relating to a financial service rendered by BDO or its representative to the Complainant on or after the date of commencement of the FAIS Act, and in which complaint it is alleged that BDO or its representative has:

- > 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 damage;
- > 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
- > has treated the Complainant unfairly.

**FAIS OMBUD COMPLAINANT** – means a client who submits a complaint to the FAIS Ombudsman in relation to the application of a policy and includes advice rendered.

**REPORTABLE COMPLAINT** - means any complaint other than a complaint that has been:

- > upheld immediately by the person who initially received the complaint; i.e. all complaints need to be recorded on an appropriate register, even though the matter is upheld immediately. It can be closed immediately on the system but needs to be captured.
- > upheld within the financial institution's ordinary processes for handling

customer queries in relation to the type of agreement, product or service complained about, provided that such process does not take more than five business days to complete from the date the complaint is received; or

- > submitted to or brought to the attention of the financial institution in such a manner that the financial institution does not have a reasonable opportunity to record such details of the complaint as may be prescribed in relation to reportable complaints.

**CUSTOMER QUERY** - means a request to the financial institution by or on behalf of a client or prospective client, for information regarding the financial institution's products, services, or related processes, or to carry out a transaction or action in relation to any such product or service. Please note that there is no expectation to capture queries unless the query has become a complaint.

**REJECTED** - means that a complaint has not been upheld and the insurer regards the complaint as finalised after advising the complainant that it does not intend to take any further action to resolve the complaint and includes complaints regarded by the insurer as unjustified or invalid, or where the complainant does not accept or respond to the insurer's proposals to resolve the complaint.

**PROSPECTIVE CLIENT OF A FINANCIAL INSTITUTION** - means a person who has applied to or otherwise approached the financial institution in relation to becoming a client of the financial institution, or a person who has been solicited by the financial institution to become a client or has received marketing or advertising material in relation to the financial institution's products or services.

**UPHELD IN RELATION TO A COMPLAINT** - means that the complaint has been finalised in such a manner that the complainant has explicitly accepted that the matter is fully resolved or that it is reasonable for the financial institution to assume that the complainant has so accepted. A complaint should only be regarded as upheld once all undertakings made by the financial institution to resolve the complaint have been met.

**REPORTS (OR REPORTING)** - means any periodic or ad-hoc reports (and related documents) obtained from the complaints management system and other sources in the business which shall be used for analysis, monitoring, submissions to regulatory authorities, and the making of recommendations to the business.

## 5. KEY PRINCIPLES AND STANDARDS FOR EFFECTIVE COMPLAINTS MANAGEMENT

The following principles and standards shall apply to the complaints management processes within BDO:

- > **Accessibility:** BDO makes complaints reporting visible to clients on all key documents provided to them as well as on its website.
- > **Client-centricity:** Complaint handling staff are expected to demonstrate the right attitude toward every client.
- > **Quality of investigation:** BDO will take reasonable steps to gather and investigate all relevant information and circumstances when handling complaints.
- > **Timely resolution:** BDO's quality standards recognise that all complaints must be resolved in a timely manner and in line with timelines set out in this framework.
- > **Consistent and objective decision-making:** BDO will ensure that employees and decision-makers avoid bias when handling complaints so that principles of fairness and objectivity are upheld.
- > **Independent review:** Through the BDO Arbitrators, BDO will provide additional opportunities for independent review of complaints in line

with the escalation and review process contained in this framework.

Where required, segregation of duties and escalation procedures will be utilised to maintain and safeguard independence of employees responsible for handling complaints.

- > **Confidentiality of client Information and data:** As far as possible, BDO will maintain the confidentiality of clients' personal information and comply with the relevant legislation to ensure that internal controls are in place for safeguarding of data.
- > **Accuracy of record-keeping:** Complaints must be accurately, efficiently, and securely recorded.
- > **Communication before, during and after complaint:** BDO will provide clients with clear upfront communication concerning how they can complain and how their complaint will be handled.
- > **Quality Assurance:** BDO will ensure that there is an appropriate level of quality assurance in place to monitor that the standards referred to in this framework are adhered to.
- > **Meaningful Management Information (MI) and Analysis:** Useful management information reports pertaining to complaints will be developed and implemented, subject to regulatory requirements and business needs.

## 6. PROCESSES – COMPLAINTS HANDLING

BDO is responsible to acknowledge the complaint with the client as well as provide them with regular feedback. The maximum time for acknowledgement of a complaint is five (5) business days. Where the complaint is urgent (i.e. the risk of reputational impact is high), this time frame must be shortened even further. Please refer to the diagram below.

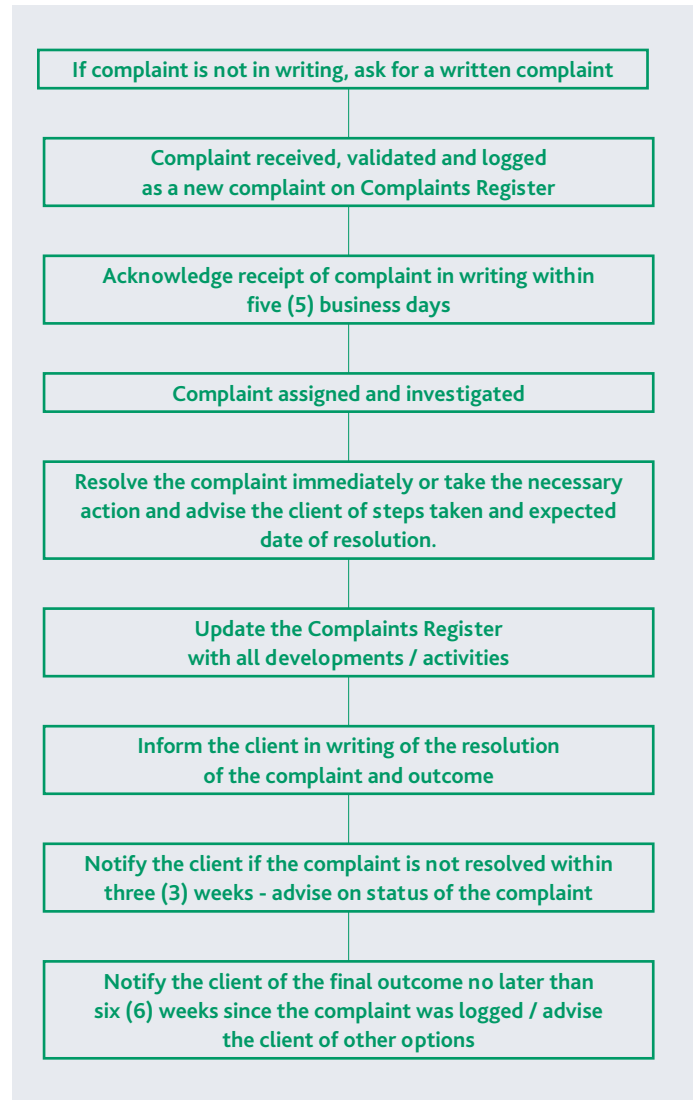
BDO deals with complaints as follows (for high-level complaints the period of acknowledgement should be shorter):

- > Log the date and contents of the complaint in the **General Complaints Register**.
- > Accept all complaints submitted from whatever medium; verbal or written (ask the client to send their complaint in writing if possible). The fact that a complaint is not in writing must not deter the FSP in handling the complaint.
- > Acknowledge receipt of the complaint in writing within five (5) business days of receipt and give the client the name(s) and contact details of the staff responsible for the resolution of the complaint.
- > Investigate the complaint to ascertain whether the complaint can be resolved immediately. If resolved immediately the complaint will not be deemed 'reportable'.
- > If the complaint can be resolved immediately, take the necessary action and advise the client accordingly. If resolved within five (5) business days, the complaint will not be deemed 'reportable'.
- > If the complaint cannot be resolved immediately or within five (5) business days, the FSP needs to lodge and categorise the complaint on the **Reportable Complaints Register** and send the client a written summary of the steps to be taken to resolve the matter and the expected date of resolution.
- > If unable to resolve the complaint within three (3) weeks of logging the complaint with the Complaints Register, notify the client by means of a written acknowledgement. This will outline the status of the complaint and the expected date of final resolution.
- > If unable to resolve the complaint within a further three (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.

- > Notify the complainant that he/she has six (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.
- > Update the register with all developments/activities.

### 6.1 COMPLAINTS PROCESS FLOW



## 7. ESCALATED COMPLAINTS / DISPUTES PROCESS

Escalated complaints are all complaints submitted via Hello Peter, social media, print media (newspaper), Compliance, CEO/EXCO, FSCA or any other regulatory authority, and via the website. These complaints are received and distributed to the relevant complaints handler.

For complaints received in the public domain like Hello Peter or social or print media, a quicker response time is crucial. Failure to respond efficiently to these complaints may lead to an escalation to other platforms within the public arena.

There are instances where more detail is required to respond accordingly where the complaint may be damaging to the BDO brand by only having a generic response. As much as the customer may distort the complaint,

BDO still has an onus to educate the public but not invade any privacy of BDO's clients.

For media complaints, i.e. newspaper publications, it is good practice to set an SLA with the journalist to ensure that the matter is resolved with the client before preparing a response to the newspaper. The response must be finalised within five (5) days of receipt of the complaint.

An appropriate internal complaints escalation process must be created to provide complainants an alternate platform or mechanism to escalate their complaint should the initial complaint not be upheld to their satisfaction.

## 8. COMPLAINT ESCALATION

The escalation must be allocated to an impartial i.e. senior person of the initial decision made so that conflict of interest may be avoided.

- > When an outcome of a complaint is reached and the client is advised of the outcome (within 3 weeks), the complaint handler must inform the client of the escalation process if they are unhappy or resolution with the complainant is not obtained.
- > If at any point in the process, the complaints handler is unable to reach resolution on a complaint, they may escalate the matter as a dispute to an independent person or forum for review. (This would normally take place in the 3-6-week window for handling complaints in terms of FAIS).
- > The complainant needs to be informed of the escalation process for further review and the contact name and details of the person handling the escalation, if applicable, needs to be given to the customer.
- > The independent person/s or forum will review the complaint and a recommendation or final decision will be provided to the customer. A decision should be reached no later than six (6) weeks of the complaint initially being recorded.
- > BDO will then provide feedback to the customer in writing with the reasons for the decision, information taken into consideration and details for further recourse with the relevant Ombudsman, if the customer is still unhappy.

### 8.1 ARBITRATION

In the event that a complaint remains unresolved, then the relevant matter can be referred to a suitable individual or organisation, qualified to provide the necessary arbitration and this suitable person can be nominated by the complainant themselves, or by consensus from both parties.

The Arbitrator will acknowledge receipt of the complaint escalation within 48 hours and inform the referrer of:

- > Details of information required from referrer;
- > Where, how and to whom the complaints and related information must be submitted;
- > Expected turnaround times to finalise the complaint escalation or review;
- > Any other relevant responsibilities of the referrer.
- > The Arbitrator will inform the referrer of the outcome of the referral within fifteen (15) working days after receipt.
- > The Arbitrator responsible will ensure that decisions are impartial and will always have due regard to the fair treatment of clients.

## 9. PARTNER COMPLAINTS RESOLUTION

The partner/service provider may in some instances hold the relationship with the client and therefore all communication may occur directly with the client. This means that if the client is dissatisfied and wants to complain, the initial channel of complaint will be directly with the partner/

service provider. The partner/service provider will therefore need to ensure in all instances that:

- > Complainants are promptly informed of the process that will be followed in handling the complaint (e.g., indicative timelines; availability of escalation or Ombud options in the event of an outcome not in the complainant's favour; contact details of the person who will be handling the complaint to follow up on progress.)
- > If the partner/service provider is unable to resolve the complaint, there should be clear processes to escalate to a contact person within BDO.
- > The partner/ service provider must record all complaints received and keep a register of the resolution of the complaints relating to BDO.
- > The complaints register needs to be given to BDO on at least a monthly basis to record on the FSP's systems should the partner/ service provider not be automatically linked.
- > When the partner/service provider makes a final decision on a complaint and is informed by the client that they are unhappy with the outcome of their complaint, the partner/service provider must escalate the complaint to BDO. The partner must exhaust their internal complaints process first before advising the client of the escalation procedures.

## 10. OMBUD MINIMUM REQUIREMENTS

### 10.1 GENERAL:

- > BDO clearly and transparently communicates the availability and contact details of the relevant Ombudsman schemes to clients on all applicable disclosure documentation.
- > Where appropriate, we also display information regarding the availability and contact details of the relevant Ombudsman services on our websites.
- > Although BDO cannot control when a client will escalate a complaint to the respective Ombudsman, BDO will always:
  - Maintain open and honest communication and co-operation between ourselves and any Ombud with whom we deal; and
  - Endeavour to resolve a complaint before a final determination or ruling is made by an Ombud, without impeding or unduly delaying a complainant's access to an Ombud.
- > BDO will maintain specific records and carry out specific analysis of complaints referred to the Ombudsman and their outcomes.
- > BDO monitors determinations (whether involving our business or others), publications and guidance issued by the relevant Ombudsman with a view to identifying failings of risks in BDO's products, services or practices and to be aware of such rulings or determinations in relation to claims process and interpretation of Policy provisions across the board.

### 10.2 COMPLAINTS REFERRED TO THE OFFICE OF THE OMBUD IN TERMS OF THE FAIS ACT:

#### 10.2.1 INTRODUCTION:

BDO is an authorised Financial Services Provider (hereinafter referred to as "FSP") in terms of the Financial Advisory and Intermediary Services Act No. 37 of 2002 ("the FAIS Act").

As an FSP, BDO are obliged to maintain an Internal Complaints resolution process which includes the maintenance of a comprehensive complaints framework outlining our commitment

to and procedures for internal resolution of complaints which are required to be handled in accordance with the FAIS Act.

### 10.2.2 COMMUNICATION AND ESCALATION PROCESS PERTAINING TO "FAIS" RELATED COMPLAINTS:

#### Internal Communication:

The table re-allocation of responsibilities outlines the roles and responsibilities of the stakeholders responsible for governance of this framework.

- > Each governance structure specified above will receive routine feedback and communication related to the functioning of this framework on a periodic basis.
- > Ad-hoc or non-routine communication may be performed from time to time.

#### External Communication:

- > Reporting to the Financial Services Conduct Authority ("FSCA") must be done on an annual basis in respect of all FAIS complaints received for the reporting period, or as requested by the FSCA.
- > From time to time, there may be a need to request information from external FSPs with respect to FAIS complaints received, to obtain information that will ensure a proper resolution of any such complaints.

### 10.2.3 ELEMENTS OF A COMPLAINT: PERTAINING TO "FAIS" RELATED COMPLAINTS:

In terms of the FAIS Act, a complaint must relate to a financial service rendered by BDO to the complainant, in which it is alleged that BDO:

- > has contravened or failed to comply with the FAIS Act and that as a result thereof the complainant has suffered or is likely to suffer financial prejudice or damage;
  - > has 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
- > has treated the complainant unfairly.

The elements of a complaint are:

- > It must be in respect of advice or intermediary services provided at any time after the 1st of October 2004; and
- > The complainant must have suffered, or is likely to suffer, a financial loss because of failure on the part of BDO to comply with the FAIS Act; or
- > The complainant must have suffered, or is likely to suffer, financial loss as a result of BDO having wilfully or negligently rendered advice or intermediary 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
- > BDO treated the complainant unfairly.

### 10.2.4 BDO'S "FAIS" COMPLAINTS RESOLUTION PRINCIPLES:

The following are BDO principles which must be followed by all employees involved in the management and resolution of FAIS complaints for BDO:

- > This framework will always be available to complainants upon request, and our complaints process may be accessed at any time through the BDO website.

- > The availability of this framework will be made known in relevant business documents and/or communications to complainants.
- > FAIS complaints must be submitted in writing and must contain all relevant information, and copies of all relevant documentation must be attached thereto.
- > All FAIS complaints will be logged on the complaint management system by the complaint handling staff member within 24 hours after receipt.
- > The complaint handling staff member will also send a written acknowledgement of receipt to the complainant within 24 hours.
- > The complaint handling staff member will assess the merits of the complaint to decide, either wholly or partially in favour of the complainant or the company.
- > BDO shall have six (6) weeks in which to respond to a complaint received from the FAIS Ombud.
- > All attempts to resolve the complaint will be undertaken and the final decision will be communicated to the complainant in writing once a final decision is made.
- > Such outcome must also be communicated to the FAIS Ombud.
- > As stipulated in the FAIS act, where a complaint cannot be resolved within six (6) weeks of receipt, BDO will send a written correspondence to the complainant informing the complainant that the complainant may refer the complaint to the Office of The Ombud for Financial Services Providers within six (6) months of the date of the final correspondence from BDO.
- > In the event of a dismissal of a complaint by BDO, the complainant, if unsatisfied with the dismissal, may pursue further proceedings before the Office of The Ombud for Financial Services Providers in respect of such complaint.
- > Where a complainant remains unreasonable, and /or rejects any offer made, this too must be communicated to the FAIS Ombud. Any offer made that is accepted by the complainant must also be communicated to the FAIS Ombud by the complaints handling staff member.
- > There will be adequate training of all relevant staff, including imparting and ensuring full knowledge of the provisions of the FAIS Act, the Rules of the Office of The Ombudsman for Financial Services Providers and the FAIS Act General Code of Conduct, with regard to the management and resolution of FAIS complaints.
- > Internal analysis will be done on trends to avoid re-occurrence of similar FAIS complaints, and/or to improve services and complaints systems and procedures where necessary.

## 11. COMPLAINTS MANAGEMENT STRUCTURE

Within BDO, there are various role players that assist with the resolution of complaints. The role of each of these role players have been defined below.

### MANAGEMENT TEAM:

The Management Team will be responsible for:

- > Maintenance and enhancements of the complaints system.
- > Drafting, maintaining and distributing the Complaints Management Policy. The policy will be reviewed annually unless new requirements are added from the various legislative bodies. All changes to the document will be signed off by the Board. The policy can be requested via the BDO website.
- > Any training needs to be filtered down by these individuals to representatives and service providers involved in marketing, distributing, providing or administering our products or services or interacting with



clients or prospective clients with regards to requirements on complaint handling and the use of the Complaints Management System.

- > Statutory reporting regarding complaints.
- > Framework for effective complaint management processes.
- > To provide quarterly reports to the Board and highlight trends on complaints received.
- > Facilitation of complaints from escalated platforms such as CEO, Social and Print media, Hello Peter, Compliance, FSCA and Web complaints.
- > Perform Root Cause Analysis with a view to managing market conduct risks and improving outcomes and processes.

- > Provide required tools to ensure Root Cause Analysis (RCA) and continuous improvement is implemented after a complaint is received.
- > Follow-up calls to clients on all escalated complaints once the business has upheld the complaint to ensure the customer is satisfied with the outcome.
- > Compliance to conduct annual reviews/audits of BDO to ensure they comply with the Policy.

The table below outlines the roles and responsibilities of the stakeholders responsible for governance of the framework:

RESPONSIBILITY	STRUCTURE	INTEREST, DUTIES AND RESPONSIBILITIES
<b>Supervision</b>	Board of Directors	The Board is ultimately responsible for the requirements of this framework but delegates some functions to Executive Management.
<b>Operational Implementation</b>	Executive Management, Management Team and Key Individuals	<ul style="list-style-type: none"> <li>&gt; Approves and oversees the effectiveness of this framework.</li> <li>&gt; Takes responsibility for:               <ul style="list-style-type: none"> <li>• Implementing the requirements of this framework.</li> <li>• Providing on-going guidance to the business on matters relating to this framework.</li> <li>• Monitoring on-going operating effectiveness of the framework.</li> <li>• Operational implementation of this framework and processes developed in accordance with this framework.</li> <li>• Ensuring the execution of agreed standards including quality assurance.</li> <li>• Implement, communicate &amp; ensure that all complaints are managed in accordance with this framework.</li> </ul> </li> </ul>
<b>Consulted</b>	Compliance	<p>Compliance is responsible for:</p> <ul style="list-style-type: none"> <li>&gt; Reviewing adherence to the requirements outlined by this framework.</li> <li>&gt; Ensuring that this framework remains in line with legislation.</li> </ul>

## 12. COMPLAINT CATEGORIES / RECORDKEEPING & RETENTION

### THE 9 CATEGORIES IN TERMS OF TCF

In addition to the FAIS recordkeeping requirements, the following minimal standards are a requirement. All reportable complaints must be captured on the central complaints system/register and needs to adhere to the minimum requirements as listed below.

### COMPLAINTS SYSTEM

The complaints system has been adapted to accommodate the requirements listed below from the FSCA. It is therefore crucial that this information forms part of the minimum requirements for capturing complaints from any source. The following information must be captured:

- > All relevant details of the complainant and the subject matter of the complaint, including copies of all relevant evidence, correspondence, and decisions.
- > Appropriate TCF-aligned categorisation of complaints. (To include the 9 minimum required categories.)

Financial institutions should categorise, record and report on complaints by identifying the TCF Outcome category to which a complaint most closely relates and group complaints accordingly.

For some of the TCF Outcomes (Outcomes 5 and 6), additional subcategories are proposed. There are therefore a total of nine minimum categories which should be used, wherever applicable.

The following details will be captured in respect of each reportable complaint:

- > all relevant details of the complainant and the subject matter of the complaint;
- > copies of all relevant, evidence, correspondence & decisions;
- > the complaint categorisation as set out below:
  - complaints relating to the design of a policy or related service, including the premiums or other fees or charges related to that policy or service;
  - complaints relating to information provided to policyholders;
  - complaints relating to advice;
  - complaints relating to policy performance;
  - complaints relating to service to policyholders, including complaints relating to premium collection or lapsing of policies;
  - complaints relating to policy accessibility, changes or switches;
  - complaints relating to complaints handling;
  - complaints relating to insurance risk claims, including nonpayment of claims; and
  - other complaint categories relevant to the FSP's business model, policies, services and policyholder base.
- > progress and status of the complaint, including whether such progress is within or outside any timelines set out in this framework.

BDO will ensure that clients who are financially prejudiced because of our contravention, non-compliance, action, failure to act, or unfair treatment are fairly compensated.

- > A written response will be sent to a complainant or their authorised representative once the complaint is finalised:
- > Where a complaint is upheld, any commitment to make a compensation payment, goodwill payment or to take any other action will be carried out without undue delay and within any agreed timeframes.
- > Where a complaint is rejected, the complainant will be provided with clear and adequate reasons for the decision and be informed of the escalation or review process, including how to use it and any relevant time limits.

BDO shall make available in our offices the following, which can also be requested via our website:

- > Details of information required from complainants;
- > Where, how and to whom the complaints and related information must be submitted;
- > Expected turnaround times in relation to complaints; and
- > Any other relevant responsibilities of complainants.

BDO will analyse complaints reports extracted from the complaint reporting system on a monthly basis. Findings on identified risks, trends and actions taken will be contained in market conduct reports.

Progress and status of the complaint, including whether such progress is within or outside any relevant prescribed timelines or internal service levels.

Details of numbers of complaints received, complaints upheld, rejected complaints, complaints escalated by complainants to the internal review function (where applicable), complaints referred to an Ombud, compensation payments and goodwill payments.

### 13. COMPLAINT CATEGORIES

#### GUIDE TCF-ALIGNED COMPLAINT CATEGORIES

The categories for TCF outcomes are listed below with possible examples of the type of complaints that will form part of each category. These reasons are not fixed to a specific outcome and the outcome selected may differ according to the circumstances of the complaint e.g. 'Inadequate cover type' - this could be due to the design of the product or it could be a sales error where the incorrect cover level was sold or offered. The complaint system accommodates the manual capture of the outcome breached based on the complaint received. Often, more than one outcome is breached and therefore provision has been made to capture more than one outcome per complaint.

Examples of Complaint Reasons into the Various TCF-Outcomes

#### OUTCOME 3

Unsolicited SMS  
Misrepresentation of Cover  
Data capture errors  
Incomplete declaration given  
Documents not received  
Inconsistent Feedback  
Claims decision dispute  
Misleading claims info

#### OUTCOME 4

Insufficient cover limit  
Inadequate cover type  
Misrepresentation of Cover  
Incomplete declaration given  
Inconsistent Feedback  
Misleading claims info

#### OUTCOME 5A

Insufficient cover limit

#### OUTCOME 5B

Staff unprofessional / Rude  
No or poor response  
No consent to policy  
DMASA registered  
DNC list – opt out

#### OUTCOME 6A

Notice period too long  
Penalties applied

#### OUTCOME 6B

Incomplete declaration given  
Complaint procedure not given  
No or poor response

#### OUTCOME 6C

Time to process claim too long  
Incorrect beneficiary paid  
Incorrect amount paid  
Misleading claims info  
No or poor response  
Staff unprofessional / Rude  
Settlement Dispute  
Claims decision dispute  
Dispute on assessment  
Excess Dispute  
Unhappy with service provider  
Poor Workmanship  
Repairs taking too long

Effective monitoring and analysis of complaints is a key tool to identify, manage and mitigate TCF-related and market conduct risks. Proper monitoring and analysis will maximise business value through the learnings created from analysis of complaint outcomes.

The recording, monitoring and analysis process must provide for an adequate level of regular reporting to senior management levels.

Firms need to embed a qualitative and quantitative analysis which can be used to identify positive and negative trends for complaints received.

#### OUTCOME 2

Premium too high  
Insufficient cover limit  
Inadequate cover type  
Premium increase  
Cover Limited  
Claims decision dispute  
Unable to reinstate cover  
Unable to re-issue cover  
Premium higher

A standardised Monitoring and Analysis template has been developed so that there is consistency in complaints analysis. The template will be used to identify:

- > Root cause analysis common to the categories of complaints;
- > Failings in control systems;
- > Detection of poor staff or service provider performance, lack of skills or misconduct;
- > Tracking of TCF delivery;
- > Identifying possible solutions.

Risk management, internal audit and compliance functions will provide management reporting on the effectiveness and compliance with the requirements from the FSCA.

#### 14. REPORTING / ROOT CAUSE ANALYSIS / CONTINUOUS IMPROVEMENT

The FSCA is in the process of developing a more detailed proposal regarding regulatory complaints reporting which will be in a prescribed format. Proposed reporting templates are currently being considered by the FSCA.

The FSCA believes that the reputational impact of meaningful public disclosure can act as a deterrent to unfair client treatment, and an incentive for companies to compete over the quality of the client experiences they deliver. This could mean that BDO will be required to report on our complaints in a public forum in a format prescribed by the FSCA.

The report will consist of the requirements given by the FSCA for all FSPs to abide by. In the interim, and to enable a more streamlined process for reporting, the central complaint system has been adjusted to ensure that the relevant fields are available for capture and reporting.

- > For every complaint received, it is required that we do a root cause analysis to understand the reason for the complaint and put measures in place to mitigate these risks posed and generating the complaints.
- > When recording complaints, BDO may pick up trends for the same type of complaints or numerous complaints relating to a certain area of the business. Once the root cause analysis is done, any concerns raised, or risks identified will need to be corrected within the business. This is known as continuous improvement.
- > There may be situations where we proactively identify gaps in our processes, systems, training or product without a customer lodging a complaint. This can follow the same process to highlight the risks and take action to remedy the situation.

#### 15. ADMINISTRATION & REVIEW

The Management Team of BDO is responsible for the administration, revision, interpretation, and application of this policy. The policy will be reviewed annually and revised as needed.

#### 16. VERSION CONTROL AND APPROVAL

Version	Date approved	Approved by	Notes
1.1	January 2021	Board of Directors	Reviewed Feb & Nov 2022.  Reviewed Nov 2023. Next review: Nov 2024  Reviewed Jan 2025 – no amendments needed. Next review: Jan 2026

# CONFLICT OF INTEREST POLICY

BDO Wealth Advisers (Pty) Ltd – FSP No 4549

BDO Employee Benefits (Pty) Ltd – FSP No 15751

Herein after referred to as “BDO” for the purposes of this document

## 1. SCOPE

This policy applies to all employees or future employees and contractors of BDO.

Conflicts of interest referred to in this document may either be recognised (actually identified / realised) or be potential or perceived (conceivable) and most often arise because of an actual or possible financial interest.

## 2. PURPOSE

This purpose of this policy is to assist individuals with identifying potential and actual conflicts of interest and for BDO to manage it appropriately.

It provides clear guidelines and rules, and describes the procedures to be followed to ensure that conflict of interest situations do not cause BDO to act in contravention of the Financial Advisory and Intermediary Services Act (“FAIS”) and General Code of Conduct which requires that a provider must at all times render financial services honestly, fairly, with due skill, care and diligence, and in the interests of clients and the integrity of the financial services industry.

## 3. POLICY

BDO is committed to avoiding and where this is not possible mitigating any conflict of interest that may arise between ourselves, as a financial services provider, and our clients when rendering a financial service.

Where such a conflict of interest cannot be avoided the situation will be explained to the affected client(s).

### 3.1 ALLOWABLE FINANCIAL INTERESTS

3.1.1 The following allowable financial interests have to be disclosed internally in the company's gift register:

- > Promotional items (with a value of no more than R1000.00 per FAIS representative / key individual in any given year); and
- > any other financial interest with a determinable monetary value not exceeding R1000.00 per FAIS representative / key individual in any given year.

3.1.2 The following allowable financial interests have to be disclosed internally in the company's conflicts of interest register and directly and unequivocally to affected clients:

- > ownership interest;
- > directorships in other companies; and
- > rebates or fees received from product providers and which affects the fee payable by the client or which could potentially influence the advice process.

### 3.2 DISALLOWED FINANCIAL INTERESTS

The following financial interests are disallowed:

- > Financial interest to a representative or to the provider for giving preference to a quantity of business to the exclusion of quality to the client, preference to a specific product supplier or preference to a specific product;
- > cash, cash equivalent, voucher, gift, service, advantage, benefit, discount, domestic or foreign travel, hospitality, accommodation, sponsorship and any other incentive or valuable consideration not mentioned above, including travel and accommodation associated with allowed training;
- > any financial interest other than allowable financial interests listed above with a determinable monetary value exceeding R1000.00 per FAIS representative / key individual in any given year; and
- > training restricted to a selected group of providers and FAIS Representatives on including but not limited to: products and legalities thereof; general financial and industry information; specialised technological systems (of a third party) necessary for rendering a financial service.

## 4. PROCEDURE

### 4.1 MEASURES FOR AVOIDANCE OR MITIGATION OF CONFLICTS OF INTEREST AND CONTROL MEASURES

#### 4.1.1 Reporting and record keeping

- i. Both a Gifts Register for allowable financial interests (Annexure A and a Conflicts of Interest Register for Ownership interests, Directorships and Disallowed financial interests (Annexure B) have been implemented.
- ii. The Company's Management Team will act as the custodian of both the Conflicts of Interest register and the Gifts register.
- iii. Each Representative has a duty to report any such an immaterial financial interest provided or received to the custodian of the Gifts Register (within a week of giving / receiving such a gift) who shall report to the Managing Director of the Company as soon as the aggregate financial interest given or received by any one representative from that product provider or third party reaches R1 000.00 in that particular year.

#### 4.1.2 Key Individual authorisation

- i. A financial interest with a monetary value of more than R1000.01 constitutes a material conflict, and will prior to giving, or accepting such a financial interest, the employee or Representative must obtain the written consent of the Managing Director of BDO for the gift.

#### 4.1.3 Annual Key Individual and Representative disclosure

- i. All the Key Individuals and Representatives will be required to also complete the 'Conflicts of Interest Questionnaire' as provided for in Annexure C of this policy.
- ii. The conflict of interest register will be updated and reviewed by the Key Individual(s).
- iii. If it has been established that a particular situation or activity gives rise to a conflict of interest, such a situation must be avoided.
- iv. If such a conflict of interest is inevitable it is the responsibility of the Managing Director to ensure that the effect if the conflict is mitigated by disclosing the conflict of interest to the relevant client(s).

#### 4.1.4 Disclosure

- i. BDO's shareholding structure, related parties and subsidiaries if relevant is provided in Annexure D.

#### 4.1.5 Further reporting of conflicts of interest

All activities that resulted in conflict of interest situations must be reported to the company's compliance officer on a bi-annual basis.

## 5. RECORD KEEPING

Declarations and relevant registers will be stored securely for future reference.

## 6. CONSEQUENCES OF NON-ADHERENCE

Violation of this policy and procedures described herein will result in appropriate disciplinary action.

## 7. TRAINING AND AWARENESS

All staff will receive training on the Conflict of Interest policy and requirements.

## 8. REVIEW

This policy shall be reviewed annually and any changes to this policy shall be communicated to all staff.

## 9. ANNEXURES

Annexure A1: Gifts Register: Gifts Received

Annexure A2: Gifts Register: Gifts Given

Annexure B: Conflicts of Interest Register

Annexure C: Conflicts of Interest Questionnaires

Annexure D: Group Structure

## 10. VERSION CONTROL AND APPROVAL

Annexure A1: Gifts Register: Gifts Received

Annexure A2: Gifts Register: Gifts Given

Annexure B: Conflicts of Interest Register

Annexure C: Conflicts of Interest Questionnaires

Annexure D: Group Structure

Version	Date approved	Approved by	Notes
1.1	November 2020	Board of Directors	Reviewed Feb 2022.
1.2	November 2022	Practice Manager	Reviewed Nov 2023. Next review: Nov 2024
1.3	January 2025	Practice Manager	Updated Jan 2025. Next review: Jan 2026



## ANNEXURE A1: GIFTS REGISTER: GIFTS RECEIVED

DATE	VALUE OF THE GIFT IN ZAR	NAME & SURNAME OF GIFT RECIPIENT	NAME & SURNAME OF GIFT GIVER	NAME OF GIFT GIVER'S COMPANY (INCL. FSP NO IF APPLICABLE)	DESCRIPTION OF GIFT	REASON THE GIFT IS BEING GIVEN

## ANNEXURE A2: GIFTS REGISTER: GIFTS GIVEN

DATE	VALUE OF THE GIFT IN ZAR	NAME & SURNAME OF GIFT RECIPIENT	NAME OF GIFT RECIPIENT'S COMPANY (INCL. FSP NO IF APPLICABLE)	NAME & SURNAME OF BDO EMPLOYEE GIVING THE GIFT	DESCRIPTION OF GIFT	REASON THE GIFT IS BEING GIVEN

## ANNEXURE B: NOTED CONFLICTS OF INTERESTS

DATE CAPTURED	CAPTURED NATURE OF THE CONFLICT	WILL THIS CONFLICT BE AVOIDED / MITIGATED	WHAT MEASURES WILL BE TAKEN TO AVOID / MITIGATE THIS CONFLICT WHAT IMPACT WILL THIS CONFLICT HAVE ON CLIENTS	WHAT IMPACT WILL THIS CONFLICT HAVE ON CLIENTS	HAS THE MANAGING DIRECTOR APPROVED THIS CONFLICT?

## ANNEXURE C: CONFLICTS OF INTEREST QUESTIONNAIRE – KEY INDIVIDUALS

Annual Conflicts of Interest questionnaire to be completed by all Key Individuals and Representatives.

Please respond to the following questions to the best of your knowledge.

1. Please list all corporations, partnerships, associations or other organizations of which you are an officer, director, trustee, partner or employee and describe your affiliation with such entity.	
2. In terms of the FAIS Code of Conduct you must disclose to the client the existence of any personal interest in a relevant service, or of any circumstances which gives rise to annual or potential conflict of interest in relation to such service, and take all reasonable steps to ensure the fair treatment of the client. Please list any such conflicts or potential conflicts of interest which you are aware of or which you perceive may possibly exist.	
3. Non-cash incentives offered and/or other indirect consideration payable by another provider, a product supplier or any other person to the provider could be viewed as a potential conflict of interest. Please list any such incentives received by yourself, your family members and or family entities during the last 12 months (can include incentive trips, sponsorships, gifts that amount to material benefits, business services, entertainment expenses, access of preferential, differentiated service/training/advice facilities, shareholdings, sales quota obligations, product biases etc.)	
4. Please list all corporations, partnerships, or other entities in which you have a material financial interest (shareholding of 25% or more).	
5. Are you aware of any other relationships, arrangements, transactions, or matters which could create a conflict of interest or the appearance of conflict? If so, please describe.	

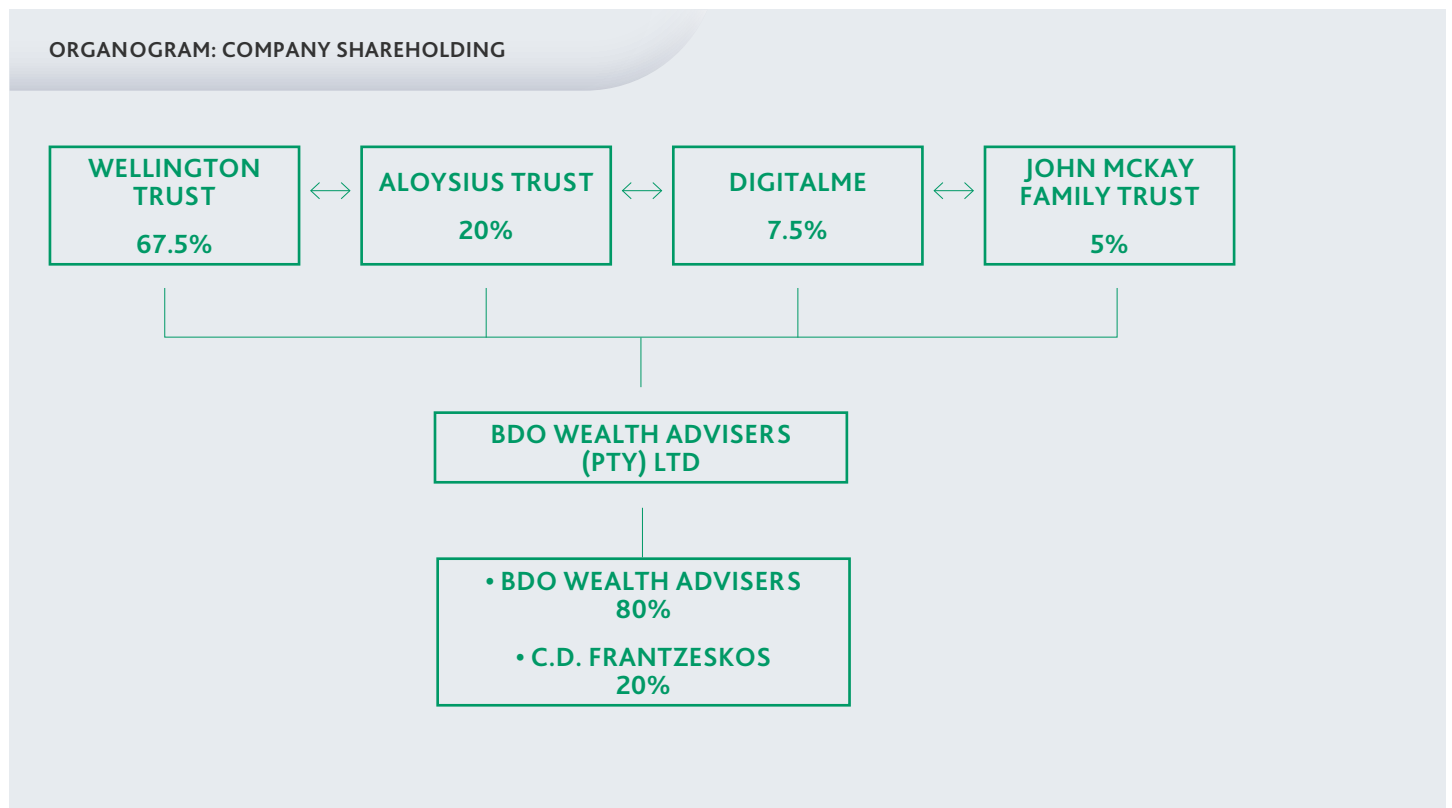
I have read the Conflicts of Interest Policy and accordingly hereby confirm that I currently comply with and agree to remain in compliance with the Policy.

Signed at ..... on this ..... day of ..... 20 .....

Name .....

Signature .....

## ANNEXURE D: GROUP STRUCTURE



BDO Wealth Advisers (Pty) Ltd and BDO Employee Benefits (Pty) Ltd, South African companies, are affiliated companies of BDO South Africa Inc, a South African company, which is a member of BDO International Limited, a UK company limited by guarantee, and forms part of the international BDO network of independent member firms.