



PHATISA COMPLAINTS POLICY AND PROCEDURE

FUND MANAGERS:

Phatisa Fund Managers Limited
Phatisa Fund Managers 2 Limited
Phatisa Property Fund Managers Limited
Phatisa Consulting (Proprietary) Limited

FUNDS:

African Agriculture Fund LLC
Phatisa Food Fund 2 LLC
PFF 2 Parallel LLC
Pan African Housing Fund LLC
African Agriculture Fund SA Encommandite Partnership

1. INTRODUCTION

Phatisa aims to provide a high standard of care in all its services. The views of our stakeholders are important to us and help to ensure our services are consistently meeting the needs we set out to address. If you are unhappy with any of our services, it is important that you let us know.

The purpose of this Complaints Policy and Procedure is to identify and pro-actively solve any issues of non-compliance, dissatisfaction, feelings of injustice or feedback (here within referred to as “complaints or grievances”) raised by our stakeholders. This includes the methods used to address any complaints received and management controls available to exercise appropriate action and supervision of the process commensurate with the level of grievance received.

We aim to handle complaints transparently, quickly, effectively and in a fair and honest way, as is reasonably practicable. We take all complaints seriously and seek to use this process to feedback into our processes and improve the services we provide. We treat all complaints in confidence. Lastly, Phatisa assures clients and their representatives that it will not withdraw or reduce services because someone makes a complaint in good faith.

This document applies to our internal and external stakeholders, including our portfolio companies, employees, local communities, interest groups, etc.

2. OUR COMPLAINTS PROCEDURE

Stakeholders are encouraged to raise any complaints they may have using appropriate channels provided below with an account of the complaint and the desired relief sought. For each complaint received, Phatisa will assess its relevance and determine the level of response necessary, if any, to achieve a resolution. Each of the steps that will be followed as part of the formal complaints procedure are outlined below.

3. SUBMISSION OF COMPLAINTS

A. Who can make a complaint

Anyone affected by the way Phatisa provides services can make a complaint. A representative may complain on the behalf of the affected person if the affected person:

- has died;
- cannot make a complaint themselves; or
- have given consent for the representative to act on their behalf.

B. How you can make a complaint

You can log your complaint via the following channels:

- in person
- by telephone on +27 (0) 11 463 1920 /+230 460 0525
- through a member of our staff
- through an advocate or representative
- by letter to the following address:

ATTENTION: The Partners
Phatisa
Suite 420, Fourth Floor
Barkly Wharf
Le Caudan Waterfront
Port Louis
Mauritius

- by email to complaints@phatisa.com.

All complaints must be lodged in writing covering the complainant details, complaint description, desired resolutions, etc., and be submitted with copies of all available documentation. In instances whereby someone complains orally, we will make a written record in a prescribed format and provide a copy of it within three (3) working days to the complainant, for approval. Once approved and all relevant documentation has been submitted, we will formally begin the investigation process and address the complaint.

C. Anonymous complaints

We deal with anonymous complaints under the same procedure; however, it is best if you can provide contact details to allow us to notify you of the outcome of our investigation. This can be another individual if you desire to stay strictly anonymous. In addition, any complainants who identify as or are identified as a vulnerable party (i.e. ethnic or religious minorities, woman, migrants, youth, persons with disabilities, etc.) are encouraged to submit a complaint anonymously instead of deterring from expressing your concerns.

D. Responsibility

The Fund ESG Manager has overall responsibility for dealing with all complaints made about Phatisa's service and shall act as the Complaints Coordinator. The ESG Manager will escalate complaints to the Phatisa Managing Partner, as relevant. The complaint will be entered into our Complaints Register on the same day that it is made. This will include the following information, as relevant:

- Complaints reference number;
- Complainant's name and contact details;
- Date of complaint;
- Recipient of the complaint;
- Details of complaint;
- Reasons for rejecting a complaint (where applicable);
- Resolutions discussed and agreed with the party(ies) in question;
- Actions implemented (including dates);
- Complaint status (open, resolved, unresolved or abandoned); and
- Outcome of the actions implemented.

We will keep record of the complaint and maintain such record for five years. We will provide, as far as is reasonably practical:

- any help you need to understand the complaints procedure; or
- advice on where you may get that help, internally in Phatisa or outside of Phatisa.

4. HOW WE HANDLE COMPLAINT INVESTIGATIONS AND RESOLUTIONS

Phatisa will ask one of the management team to investigate the complaint. That person will have enough seniority and experience to deal with the issues raised by the complaint. The persons who are or had been involved in the subject matter of the complaint will not participate in the investigation except in the capacity as a witness.

We will acknowledge a complaint within two (2) working days from date of submission and give you the name and contact details of the person investigating it, including a timeframe in which a formal response can be expected. We will use the contact details you have provided us with to provide feedback.

We will keep you informed about the progress of the investigation. We aim to have all complaints processed within twenty-one (21) working days unless we agree on a different time scale with you.

Each complaint will be assessed against the below criteria to determine the severity of the complaint, type of response required and whether additional resources should be assigned to the investigation. This includes taking into account vulnerable groups and human right breaches or abuse.

Type	Description
D	<ul style="list-style-type: none"> Positive feedback requiring acknowledgement and thanks. Feedback that is not related to Phatisa or its portfolio and needs to be directed elsewhere.
C	<ul style="list-style-type: none"> Question or request for information only.
B	<ul style="list-style-type: none"> Complaint but is not related to a recurrent question / request for information. Complaint, but there has been no regulatory breach. Complaint, but there has been no breach of Phatisa or the Fund’s internal policies. Complaint, but does not pose significant financial, reputational or operational risk for Phatisa or its portfolio companies.
A	<ul style="list-style-type: none"> Repeated or widespread complaint. Complaint that is a regulatory breach. Complaint that is a breach of Phatisa and/or Fund’s internal policies. Complaint that could pose significant financial, reputational or operational risk for Phatisa or its portfolio companies (i.e. abuse, neglect, human rights breaches, major environmental pollution incidents, etc.).

If a complaint is defined as a Type A, we will inform the Phatisa Managing Partner and Risk Committee to address the matter. If we do not have technically sound in-house resources to handle the nature of the grievance in question, we shall utilise external third-party support, as relevant. Following investigation, a report on the findings, recommendations and implementation plan from the ESG Manager shall be presented to the Risk Committee for onward recommendation to the relevant Board of Directors of the Fund Manager and Fund.

When resolving any complaint, records of all correspondence will be kept, including any follow up monitoring required must be documented and an implementation plan developed and actioned.

When we have finished investigating, we shall inform you of the results of the consideration within 21 days. If the outcome is not in your favour, full written reasons will be furnished to you within 42 days. We will arrange to meet with you, should you wish, to discuss the outcomes:

- details of the findings;
- any action we have taken; and
- our proposals to resolve your complaint.

In preparing for such a meeting, we will consider the following:

- Having an independent representative in attendance to witness and record the meeting;
- Ensuring all relevant personnel are made fully aware of all facts in the case;
- Being aware of how similar grievances may have been resolved in the past; and
- Whether an interpreter may be needed to ensure efficient communication.

The complainant has the right to be accompanied by a colleague or acquaintance, whom may be allowed to address the meeting on their behalf.

5. FOLLOW UPS AND CLOSE OUT

A complaint is closed out when no further action can be or needs to be taken. When closing out a complaint, we will ensure that there is fully documented evidence of the resolution process. This includes:

- Written internal records (with the date and time close out took place and sign off by responsible staff);
- Photographs, if relevant to documenting the resolution; and
- Written confirmation of the complainant's agreement with the resolution (as relevant).

The responsible Phatisa individual will assign a close out status in the Complaints Register as follows:

- open (under investigation);
- resolved (resolution has been agreed);
- unresolved (not possible to reach an agreed resolution and case has gone to external dispute resolution);
- abandoned (complaints where the complainant is not contactable after a certain period and complaint becomes null and void).

Where necessary, we will take appropriate action in order to avoid and prevent similar circumstances that gave rise to the complaint.

If you are still not satisfied with the outcome of your complaint, you may refer the matter to a relevant adjudicator or take such other steps as may be advised by your legal representatives.

6. TIME LIMITS

You should submit your complaint as soon as you can after the date on which the event occurred or came to your notice. If you complain more than twelve months later, we may not be able to investigate properly. Nonetheless, we shall also consider whether you had good reason for not making the complaint sooner and whether, despite the delay, it is still possible to investigate the complaint effectively and fairly.

7. CONCERNS / DISSATISFACTION

At any stage during the process, if you are not happy with the way Phatisa's dealing with your complaint you can contact our General Counsel, Joe Whitfield, at:

Physical address: Michelmores, 12th Floor, 6 New Street Square, DX 63 London Chancery Lane, London, EC4A 3BF
Tel: +44 (0)20 7659 7660
Email: joe.whitfield@michelmores.com

For complaints that fall within the South African jurisdiction, the complaint may within six months be pursued with with the Ombud for Financial Services Providers via the following contact details:

Physical address: 546 Jochemus St, Erasmuskloof, Pretoria, 0048
Phone: +27(0) 12 762 5000
Fax: +27 (0) 12 348 3447
E-mail: info@faisombud.co.za
Website: www.faisombud.co.za

For complaints that fall within the Mauritian jurisdiction, the complaint may within six months be pursued with the Ombudsperson for Financial Services via the following contact details:

Physical address: 8th Floor, SICOM Tower, Wall Street, Ebene
Phone number: +230 468 6475
Fax number: +230 468 6473
E-mail: ombudspersonfs@myt.mu
Website: www.fscmauritius.org/en/consumer-protection/complaints-handling

8. NON-RETALIATION, CONFIDENTIALITY, AND INCLUSIVITY

Phatisa assures clients and their representatives that it will not withdraw or reduce services because someone makes a complaint in good faith. Phatisa shall protect any stakeholder that raises a compliant. Any form of retaliation, victimisation or threats will not be tolerated. All records and information regarding the complaint procedure will be kept confidential. This means that the information shall only be shared with a limited number of people on a strictly need to know basis.

Phatisa will consider special requirements during the complaint process regarding vulnerable groups (i.e. women, etc) and/or cultural and language barriers. This includes ensuring the availability of both a male and a female during the process, if necessary, providing written materials in different languages and engaging interpreters.

9. PUBLICATION AND COMMUNICATION

Our Complaints Policy and Procedure will be made available on our website and accessible to all stakeholders, both internal and external. We will appropriately communicate and publicise it through employee induction and internal meetings as well as meetings and newsletters with external stakeholders. Appropriate evidence of communication will be documented.

ANNEX 1: PHATISA COMPLAINTS REPORTING FORM

Phatisa Complaints Reporting Form		
Date received:		
Received by:		
Submission method:	<i>(Verbal, in person, fax, email, etc)</i>	
Complainants Details		
Name		
Company/ Entity		
Contact details	<i>(Phone number, email address, home address, etc)</i>	
Relationship to Phatisa:		
Anonymity	Yes / No	
Date of Notification		
Complaint Details		
Description of Complaint / Suggestions:		
Desired Resolution / Information:		
Has this Complaint Been Raised Previously?	0 Yes	0 No
	Date:	Place:
Sign off		
Completed by:		
Date:		
Signature:		

ANNEX 2: PHATISA COMPLAINTS REGISTER

Ref number	Name and contact details of complainant	Date Complaint Received	Recipient of complaint	Complaint Details	Reason for rejecting complaint (if applicable)	Resolutions discussed and agreed with the complainant	Actions implemented (including dates)	Complaint status (open, resolved, unresolved or abandoned)	Outcome of the actions implemented
1									
2									
3									
4									

ESG Manager

Phatisa Managing Partner

Date