Annexure C – COMPLAINTS RESOLUTION PROCESS

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<tr><td>1. Lodge/Receive a Complaint</td><td>
The client is to submit the complaint to the FSP in writing to the contact details that appear in the Complaints Management Framework.
The complaint can be submitted by:
Hand
Post
Fax
Email
(If a complaint is submitted telephonically, the FSP will send the client an email to request the relevant details regarding the complaint. The client needs to respond and provide the requested information in writing (e.g. hand, post, fax or email).
The client must submit sufficient detail of the complaint, this includes their:
Name and surname
Policy number
ID number
Postal address
Financial Advisor
Product Supplier
Product Type: Risk, Investment, Short term, Endowment, Employee Benefits, Disability, Medical Aid, Unit Trust, Wills etc.
Complaint Category: Product features and charges; Information Disclosures; Advice; Product performance; Client Services; Access; Changes or Switches; Complaints Handling; Claims; or Other complaints.
Brief detail of the complaint
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<tr><td>2. Acknowledge</td><td>
The FSP will:
Acknowledge all complaints within 24 hours of receipt.
Clearly and transparently communicate the availability and contact details of the relevant Ombud services to complainants (clients) at all relevant stages of the relationship with a client, including at the start of the relationship and in relevant periodic communications.
Ensure all communication with a complainant is in plain language.
Provide, wherever feasible, clients with a single point of contact for submitting complaints.
Promptly inform a complainant of the process to be followed in handling the complaint, including-
Contact details of the person or department that will be handling the complaint;
indicative and, where applicable, prescribed timelines for addressing the complaint;
details of the internal complaints escalation and review process if the complainant is not satisfied with the outcome of a complaint;
details of escalation of complaints to the office of a relevant Ombud and any applicable timeline; and
details of the duties of the provider and rights of the complainant as set out in the rules applicable to the relevant Ombud
Follow up telephonic acknowledgments with a written response either by SMS or email.
Despatch a complaint reference number to the complainant on the acknowledgment of the complaint.
Disclose to the client:
the type of information required from a complainant;
where, how, and to whom a complaint and related information must be submitted;
expected turnaround times concerning complaints; and
any other relevant responsibilities of a complainant.
Despatch the details of the person allocated to the complaint to the complainant within 48 hours from receipt.
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Process Step	Step Details
3. **Allocate a Responsible person**	The FSP will ensure that: • The complaint is allocated and dealt with by a trained staff member. • The person responsible for the clients' complaint will furnish the client with his/her contact details and the reference number of the complaint (if applicable) • The Complaints Manager/Key Individual has oversight over the complaints allocated to various personnel ***[Petra Moolman / Christian Moolman]***

4. **Classify**	The FSP will:
	• Ensure that all potential issues are captured and classified for escalation, review, and action, as required
	• Reduce any complaint, issue or negative client interaction to writing then log and classify for action
	• Where a third party is acting on behalf of a complainant, the FSP will ensure that such third party delivers a certified or original consent or power of attorney to act on behalf of a complainant:
	  ○ no further dealings will be pursued with such a third party until the proper authority is obtained, however
	  ○ the complaint will be taken up directly with the complainant on whose behalf the complaint is made
	• Formally log all complaints using a relevant process / Complaints Register (whether manual or via computer database system)
	
	Risk
	
	All complaints will be prioritised as follows:
	
	<u>Risk 1</u> - These are routine complaints with potentially low business impact.
	
	Routine complaints:
	
	• require a response to the client within 15 working days
	• have the potential of becoming serious or official complaints if disregarded or ignored by the FSP
	• require staff to review the complaint and its priority with the Complaints Manager/Key Individual before proceeding to the next step
	• requires the Complaints Manager/Key Individual to decide on the appropriate person(s) to carry out subsequent steps, including the investigation
	
	<u>Risk 2</u> - These complaints are urgent and can have a serious business impact.
	
	Serious complaints:
	
	• require a response to the client within 5 - 10 working days
	• are logged on media platforms, received from Legal Advisors or immediately evidence contravention of legislation requirements such as failure to conduct a proper Needs Analysis
	• can cause reputational harm to a business and/or may cause financial loss to a client
	• need to be handled by the Complaints Manager/Key Individual or a suitable senior person delegated to the task by the Complaints Manager/Key Individual **[Petra Moolman / Christian Moolman]**
	• Complaints received from third parties and/or Legal Advisors will be responded to within 24 hours:
	  ○ acknowledge receipt of the complaint
	  ○ further requesting authority to act on the complainant's behalf such as a power of attorney or consent by the complainant to deal with the complaint on the complainant's behalf
	No information will be divulged to a third party who does not have the proper authority to act on a complainant's behalf.
	
	<u>Risk 3</u> - These are urgent official complaints received from Authorities e.g. FAIS Ombud.

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are handled by the Complaints Manager/Key Individual [Petra Moolman / Christian Moolman]
Alternatively, the investigation of the complaint may be delegated to a suitable senior person selected by the Complaints Manager/Key Individual
The required draft response and attachments will be collated by such senior person
The Complaints Manager/Key Individual is responsible for compiling the response to the Authority
The response to the Authority will be made within the stipulated turnaround time stated on the official correspondence</td></tr>
<tr><td>5. Categorisation</td><td>The FSP will categorise reportable complaints as per the following minimum categories:
The design of a financial product, financial service, or related service, including the fees, premiums, or other charges related to that financial product or financial service;
Information provided to clients;
Advice;
Financial product or financial service performance;
Service to clients, including those relating to premium or investment contribution collection or lapsing of a financial product;
Complaints handling;
Insurance risk claims which include non-payment of claims; and
Other complaints which can be additional categories relevant to the FSPs chosen business model, financial products, financial services, and client base that will support the effectiveness of its Complaints Management Framework in managing conduct risks and effecting improved outcomes and processes for its clients
Group the Complaints
The FSP will thereafter:
Categorise, record, and report on reportable complaints by identifying the category to which a complaint closely relates and group complaints accordingly.
Narrow down the categories to the impact on clients
Measure the impact of the complaint by further categorising it according to the following TCF Outcomes
<u>TCF Outcome 1</u>
Includes complaints:
other complaints relating to management issues
<u>TCF Outcome 2</u>
Includes complaints:
relating to the design of a product/service
relating to product features and charges that affect this TCF outcome
<u>TCF Outcome 3</u>
Includes complaints:
relating to unsuitable or inaccurate, misleading, confusing, or unclear information provided to a client throughout the life cycle of a product
FSP to include the Conflict of Interest disclosures required by the FAIS General Code of Conduct (Code); Section 4 and 5 of the Code or any other disclosure requirements in terms of the Code or any other legislation in these disclosures
<u>TCF Outcome 4</u>
Includes complaints:</td></tr>
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relating to the advice given to a client by an Advisor which was misleading, inappropriate, and/or tainted with conflicts of interest which were not disclosed
concerning inappropriate advice given as a result of lack of knowledge, skill, or experience on the part of the Advisor of the product/service being rendered
regarding failure to conduct a Needs Analysis and to consider the clients' financial position, goals, or life stage

<u>TCF Outcome 5</u>
Includes complaints:

about product performance and service-related issues
relating to a client's disappointment with limitations in a product/service performance of which they were unaware
relating to the inability of a product to meet a client's expectations
related to a Product Supplier's exercise of a right to terminate a product or amend its terms

<u>TCF Outcome 6</u>
Includes complaints:

relating to product accessibility, changes or switches
relating to handling and complaints relating to claims

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<tr><td>6. Investigate</td><td>
The FSP will:

Analyse the root cause of the complaint to enable the complaint to be appropriately dealt with and avoid, if possible, its re-occurrence
Identify and clarify internal and external key facts.
Escalate complaints relating to product features or services handled solely by a Product Supplier.
Whenever a complaint is escalated or reviewed ensure that:

A balanced approach is followed, bearing in mind the legitimate interests of all parties involved including the fair treatment of clients
Internal escalation of complex or unusual complaints at the instance of the initial complaint handler is provided for;
Clients may escalate complaints not resolved to their satisfaction
the escalation is allocated to an impartial, senior functionary within the provider or appointed by the provider for managing the escalation or review process of the provider.

Ensure that procedures within the complaints escalation and review process are not overly complicated or impose unduly burdensome paperwork or other administrative requirements on complainants (clients)
Document all areas of interaction and communication.
Ensure accurate, efficient, and secure recording of complaints and complaints-related information
In respect of each reportable complaint, keep a record of:

All relevant details of the complainant and the subject matter of the complaint
Copies of all relevant evidence, correspondence, and decisions
The complaint categorisation
The progress and status of the complaint, including whether such progress is within or outside any set timelines

Concerning reportable complaints categorised on an ongoing basis record the number of complaints:

Received,
Upheld,
Rejected and their reasoning,
Escalated by complainants (clients) to the internal complaints escalation process,
Referred to an Ombud and their outcomes;
and amounts of Compensation payments made,
and amounts of goodwill payments made,
the total number of complaints outstanding.

Ensure complaints information recorded is scrutinised and analysed on an ongoing basis and utilised to manage conduct risks and effect improved

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Process Step	Step Details
	outcomes and processes for clients, and to prevent recurrences of poor outcomes and errors • Obtain consent from the complainant to ensure that no personal information is divulged or processed without the complainant's knowledge or consent. • Keep the complainant appropriately updated on the progress of the investigation.
7. **Resolve and Confirm**	The FSP will: • Ensure that the proposed resolution meets the Treating Customers Fairly Outcomes, does not prejudice the FSP or complainant, and does not involve any unnecessary legal or financial implications. • Document and assess the proposed action agreed upon with the Complaints Manager and/or affected Key Individual and Representative. • Discuss and review the signed off resolution with the complainant to ensure fairness and clarity and to further ensure that the resolution deals with the root cause of the complaint. • Include recognition and documentation of any underlying issues that have contributed to the complaint and recommendations for actions to prevent the further occurrence in the review.
8. **Respond to Client**	The FSP will: • Ensure the complaint process is accessible through channels that are appropriate to the FSP's clients • Ensure there are no charges for making use of the complaint process • Ensure communication is in plain language • Clearly explain the details of the findings and proposed resolution to the client - within the agreed timeframes. • Where a complaint is upheld, if there has been any commitment by the FSP to make a compensation payment, goodwill payment, or to take any other action ensure it is carried out without undue delay and within the agreed timeframes • Where a complaint is rejected, the complainant must be provided with clear and adequate reasons for the decision and must be informed of any applicable escalation or review processes, including how to use them and any relevant time limits. • Send a written acknowledgment of the complaint to the complainant, with contact details of the FAIS Ombud, if the complaint cannot be addressed within three weeks and a single point of contact for submitting complaints. If within six weeks of receipt of a complaint the FSP has been unable to resolve the complaint to the satisfaction of a complainant, the complainant may: • refer the complaint to the Office of the FAIS Ombud if he/she wishes to pursue the matter; and • the complainant must do so within six months of receipt of such notification. • Appropriate processes for engagement with the Ombud
9. **Follow up and review**	The FSP will: • Diarise complaints to ensure it remains within the appropriate turnaround times. • Keep complainant appropriately informed of the progress of their complaint, • Keep complainant appropriately informed of causes of any delay in the finalisation of a complaint and revised timelines, should a complaint exceed the turnaround time due to unforeseen and reasonable circumstances. • Keep complainant appropriately informed throughout the complaints process of the resolution being sought. • Conduct a follow-up on the resolution of the complaint, to ascertain whether the client was satisfied with the complaints-handling process and the resolution sought and whether the resolution was proper and fair. • Action any negative responses in the review of complaints.
10. **Quality Assurance and Close**	The FSP will: • Ensure the Board of Directors/Governing Body/Complaints Manager/Key Individual ensures that all employees of the business have access to the Complaints Management Framework.

Process Step	Step Details
	• Ensure the Board of Directors/Governing Body/Complaints Manager/Key Individual approves and oversees the effectiveness of the implementation of the Complaints Management Framework. • Ensure the responsible person, making a decision or recommendation, is adequately trained, has an appropriate mix of experience, knowledge, and skills in complaints handling, fair treatment of customers, subject matter concerned, relevant legal and regulatory matters also not subject to conflict of interest and be adequately empowered to make impartial decisions or recommendations. • Ensure clients will be made aware of the Complaints Management Framework and will have access to the manual upon request. • All complaints will be reviewed monthly and will be used as TCF Management Information to improve overall TCF outcomes. • Action all complaints to prevent re-occurrence of poor outcomes and errors, where feasible. • Ensure complaints are scrutinised and analysed on an ongoing basis • Ensure complaints are utilised to manage conduct risks • Ensure complaints effect improved outcomes and processes for its clients • Update the Complaints Register. • Ensure compliance with any prescribed requirements for reporting complaints information to any relevant designated authority or the public as may be required by the Registrar. • Close the matter.