

1. Complaints Policy

We are committed to:

- Resolving client complaints in a manner which we believe is fair to our clients, our business and our staff
- Ensuring that clients have full knowledge of the procedures established for internal resolution of their complaints, details of which will be given to them in writing.
- Ensuring easy access to our complaints resolution facilities at any of our offices, or by way of post, telephone or electronic help desk support.
- Employing and empowering properly trained people in our business to deal with complaints, as well as with the escalation of serious non-routine complaints.
- Dealing with complaints in a timely and fair manner, with each complaint receiving proper consideration in a process that is managed appropriately and effectively.
- Offering full and appropriate redress in all cases where a complaint is resolved in favour of a client – without delay.
- Informing clients of their right to refer their complaints to the FAIS Ombud should a complaint not be resolved to their satisfaction within four weeks from the date on which the complaint is received.
- Maintaining records of all complaints received for a period of 5 years, which will specify whether or not complaint were resolved
- Implementing follow-up procedures to:
 - Ensure the avoidance of occurrences giving rise to complaints and
 - Improve services and complaint systems and procedures where necessary

2. Definition of Complaint

Complaint means a specific complaint relating to a financial service rendered to the client on or after the date of commencement of FAIS, alleging that we:

- Contravened or failed to comply with a provision of FAIS and that, as a result, the client has suffered or is likely to suffer financial prejudice or damage;
- Wilfully or negligently rendered a financial service to the client which has caused prejudice or damage to the client or which is likely to result in such prejudice or damage; or
- Treated the client unfairly.

3. Complaints Procedure

We deal with a complaint as follows:-

- 3.1 Log the date and contents of the complaint in the Complaints Register
- 3.2 If a complaint is not in writing, ask the client to lodge the complaint in writing.
- 3.3 Acknowledge receipt of the complaint in writing within 5 days of receipt, and give the client the name(s) and contact details of the staff responsible for the resolution of the complaint.
- 3.4 Investigate the complaint to ascertain whether the complaint can be resolved immediately.
- 3.5 If the complaint can be resolved immediately, take the necessary action and advise the client accordingly.

- 3.6 If the complaint cannot be resolved immediately, send the client a written summary of the steps to be taken to resolve the matter and the expected date of resolution.
- 3.7 If unable to resolve the complaint within 4 weeks of logging the complaint in the Complaints Register, notify the client accordingly and advise the client of his / her right to:
- Proceed in terms of Rule (6)a and 6(b) of the Rules on Proceedings of the Office of the Ombud for Financial Services Providers (see Annexure A); or
 - Seek legal redress in another forum.
- 3.8 Update the register with all developments/activities.

4. Annexure A

Rule 6(a) and 6(b) of the Rules on Proceedings of the Office of the Ombud for Financial Services Providers.

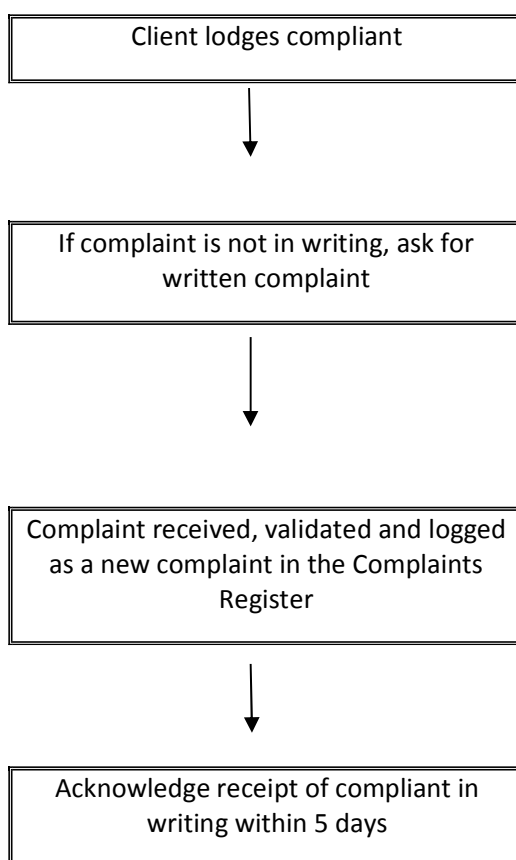
6(a) Where a complaint cannot in a reasonable time be addressed by the responding party [provider], the responding party must as soon as reasonably possible send to the complainant a written acknowledgement of the complaint with contact references of the responding party.

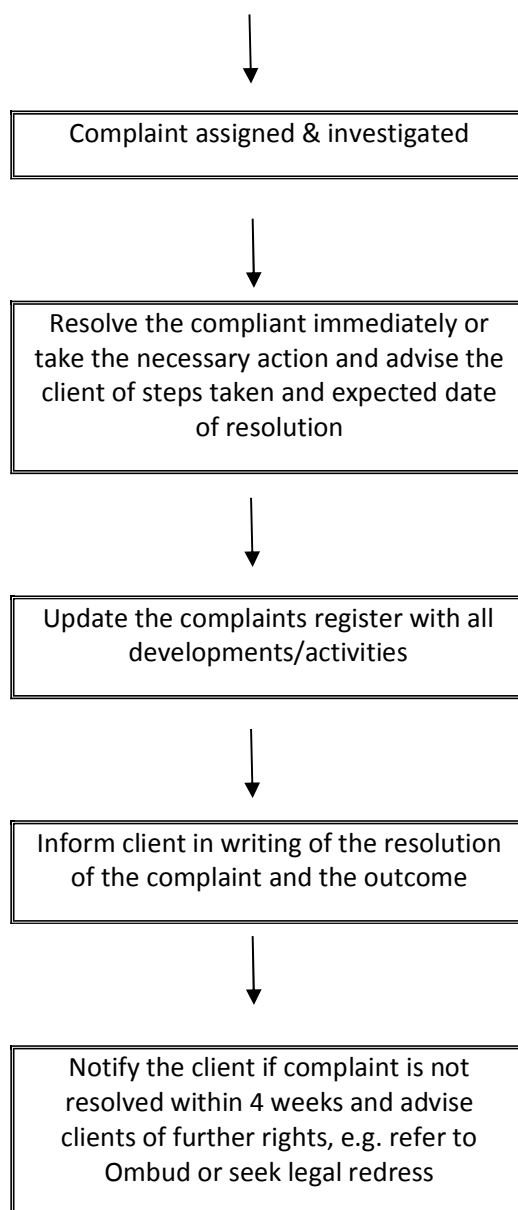
6(b) If within four weeks of receipt of a complaint the responding party has been unable to resolve the complaint to the satisfaction of the client, the responding party must inform the complainant:

- (i) the complaint may be referred to the Office [of the Ombud for Financial Services Providers] if the complainant wished to pursue the matter; and
- (ii) the complainant should do so within six months of receipt of such notification

5. Annexure B

Complaints process Flow





6. Annexure C

Complaints Register.

The register must contain the following fields:

RECEIVED: This field will reflect the date on which the letter was received. The receipt period starts its calculations here

DATE CAPTURED: The date of the day on which the complaint is captured.

RECEIVED FROM: The name and designation for the person that submitted the complaint must be entered here, It may be a client or a client's representatives.

PRODUCT: The product involved if any

COMPLAINT REFERENCE NUMBER: this field contains the client's reference number linked to Policy No.

CLIENT SURNAME AND INITIALS: Enter the surname of the client making the complaint

COMPLAINT DESCRIPTION/TYPE: Short summary of the complaint.

CAPTURED BY: The name of the person who captured the complaint

RESPONSIBLE PERSON: Who will deal with the complaint and ensure that it is resolved.

ACTIVITY UPDATE: Log all developments and movements.

OUTCOME OF COMPLAINT: Summary of what decision was taken.

DATE OF FINAL COMMUNICATION TO CLIENT: Date of letter to the client

LESSONS: This is a field where any possible lessons learned from the handling of this complaint can be entered.