COMPLAINTS PROCESSES AND PROCEDURES

FSP 52693

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1. PURPOSE OF THIS DOCUMENT

The objective of the policy is to ensure that complaint management processes are embedded across Taxisure (Pty) Ltd, by ensuring that:

1. all legislative requirements have been met
2. roles and responsibilities
3. service level agreements
4. defined procedures

2. DEFINITIONS

IMPORTANT PPR DEFINITIONS	PPR definition and Taxisure Risk Specialists (Pty) Ltd
Complaint	Complaint means an expression of dissatisfaction by a person to a provider or, to the knowledge of the provider, to the provider's service supplier relating to a financial product or financial service provided or offered by that provider which indicates or alleges, regardless of whether such an expression of dissatisfaction is submitted together with or in relation to a client query, that - (a) the provider or its service supplier has contravened or failed to comply with an agreement, a law, a rule, or a code of conduct which is binding on the provider or to which it subscribes; (b) the provider or its service supplier's maladministration or wilful or negligent action or failure to act, has caused the person harm, prejudice, distress or substantial inconvenience; or (c) the provider or its service supplier has treated the person unfairly;
Complainant	"Complainant" means a person who submits a complaint and includes a - (a) client; (b) person nominated as the person in respect of whom a product supplier should meet financial product benefits or that persons' successor in title; (c) person whose life is insured under a financial product that is an insurance policy; (d) person that pays a premium or an investment amount in respect of a financial product; (e) member; (f) person whose dissatisfaction relates to the approach, solicitation marketing or advertising material or (g) an advertisement in respect of a financial product, financial service or related service of the provider, who has a direct interest in the agreement, financial product or financial service to which the complaint relates, or a person acting on behalf of a person referred to in (a) to (f);
Client query	Client query means a request to the provider or the provider's service supplier by or on behalf of a client, for information regarding the provider's financial products, financial services or related processes, or to carry out a transaction or action in relation to any such product or service.
Compensation payment	**Compensation payment** means a payment, whether in monetary form or in the form of a benefit or service, by or on behalf of a provider to a complainant to compensate the complainant for a proven or estimated financial loss incurred as a result of the provider's contravention, non-compliance, action, failure to act, or unfair treatment forming the basis of the complaint, where the provider accepts liability for having caused the loss concerned, but excludes any - (a) goodwill payment; (b) payment contractually due to the complainant in terms of the financial product or financial service concerned; or (c) refund of an amount paid by or on behalf of the complainant to the provider where such payment was not contractually due; and includes any interest on late payment of any amount referred to in (b) or (c);

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

Rejected	Rejected in relation to a complaint means that a complaint has not been upheld and the provider 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 provider as unjustified or invalid, or where the complainant does not accept or respond to the provider's proposals to resolve the complaint.
Reportable Complaint	Reportable complaint means any complaint other than a complaint that has been - (a) upheld immediately by the person who initially received the complaint; (b) upheld within the provider's ordinary processes for handling client queries in relation to the type of financial product or financial service complained about, provided that such process does not take more than five business days from the date the complaint is received; or (c) submitted to or brought to the attention of the provider in such a manner that the provider does not have a reasonable opportunity to record such details of the complaint as may be prescribed in relation to reportable complaints.
Upheld	Upheld means that a complaint has been finalised wholly or partially in favour of the complainant and that-- (a) the complainant has explicitly accepted that the matter is fully resolved; or (b) it is reasonable for the provider to assume that the complainant has so accepted; and (c) all undertakings made by the provider to resolve the complaint have been met or the complainant has explicitly indicated its satisfaction with any arrangements to ensure such undertakings will be met by the provider within a time acceptable to the complainant.
Internal Complaints Review and Escalation Process	Internal Complaints Review and Escalation Process means the system and procedures established and maintained by the FSP in accordance with the General Code of Conduct for the resolution of reportable complaints lodged against the FSP by complainants.
Complaint Dispute Facilitator	Complaint Dispute Facilitator refers to an impartial, senior functionary within the provider, or who has been appointed by the provider, to manage the internal complaints escalation and review process.
PPR	Policyholder Protection Rules
Product	Any product which is sold on behalf of an Insurer by Taxisure Risk Specialists (Pty) Ltd
Resolved complaints and closed complaints	Taxisure Risk Specialists (Pty) Ltd will deem a complaint as “resolved” and “closed” by applying the guidelines of the “upheld” and “rejected” definition as stated in PPR. This further means that no case may be closed until all decisions or commitments made by Taxisure Risk Specialists (Pty) Ltd or its business partners to finalise the complaint have been met.
SLA	Service Level Agreement
TCF	Treating Clients Fairly
Defined timelines	The defined timelines provide the calculation of working days vs the applicable working hour turnaround times

	Turnaround times in working hours	Working days
	8	1
	16	2
	24	3
	32	4
	40	5
	48	6
	56	7
	64	8
	72	9
	80	10

3. COMPLAINT MUST BE RELEVANT

In terms of the FAIS Act, a "complaint" means, a specific complaint relating to a financial service rendered by a financial services provider or representative to the complainant on or after the date of commencement of this Act, and in which complaint it is alleged that the provider or representative -

- has contravened or failed to comply with a provision of this 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;

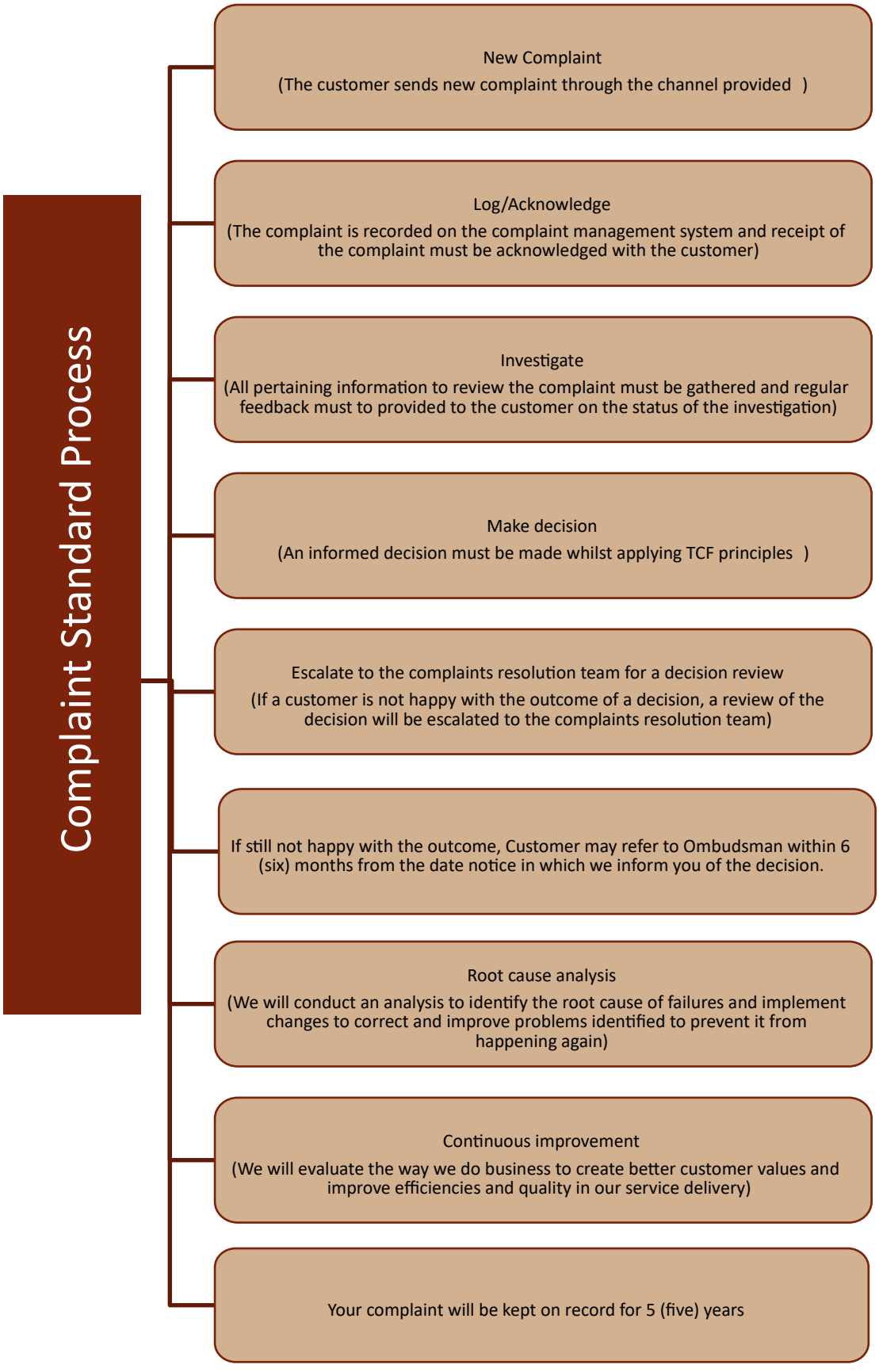
The financial services environment is complex. We will endeavour to address all reasonable requests from our clients but may also refer you to a more appropriate facility. Where the complaint relates to any aspect of our service, or any disclosures that ought to be made by us, we will endeavour to address those complaints in writing, within **7 (seven) working days**.

In instances where the complaint relates to any matter that is not within our control, such as product information or investment performance, we will forward the complaint to the product supplier concerned. Please be advised that we reserve the right to recover costs or damages that we may suffer as a result of clients making frivolous, vexatious or unreasonable claims.

4. TREATING CLIENTS FAIRLY

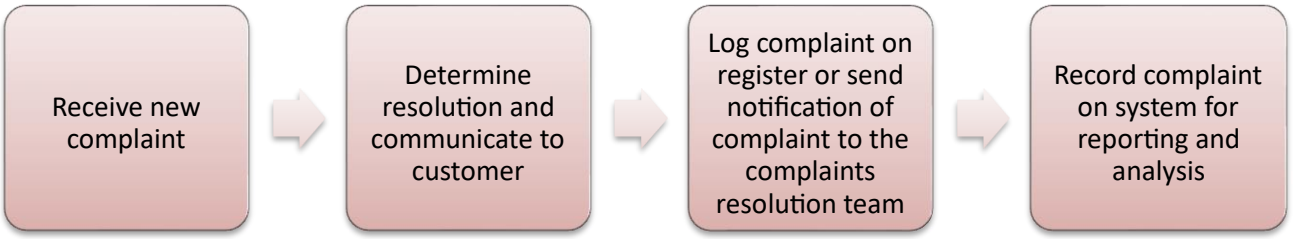
- TCF is a crucial component in the way complaints are managed. These principles are:
- Customers can be confident they are dealing with firms where TCF is central to the corporate culture.
- Products and services marketed and sold in the retail market are designed to meet the needs of identified customers and groups and are targeted accordingly.
- Customers are provided with clear information and kept appropriately informed before, during and after point of sale.
- Where advice is given, it is suitable and takes account of the customer's circumstances.
- Products perform as firms have led customers to expect, and service is of an acceptable standard and as expected by customers.
- Customers do not face unreasonable post-sale barriers imposed by firms to change product, switch providers, submit a claim or make a complaint.

COMPLAINT MANAGEMENT STANDARD PROCESS

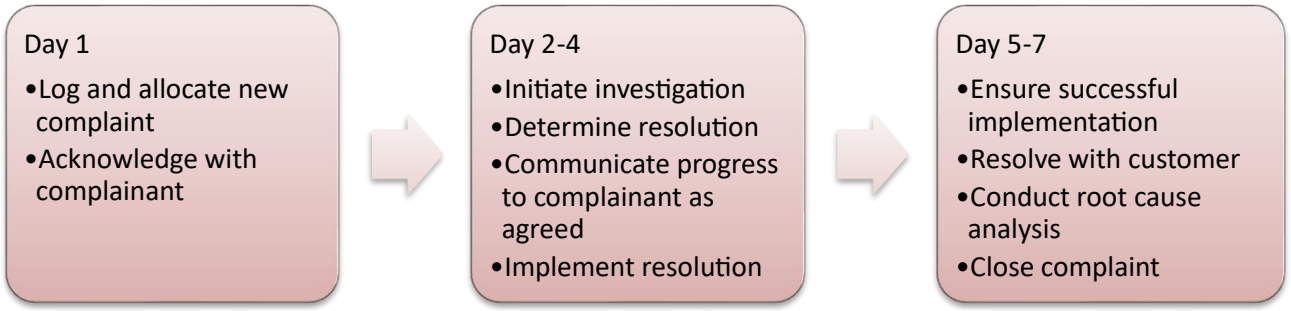


5. PROCESS AND SERVICE LEVEL AGREEMENT

5.1 Our internal complaints resolution process is intended to provide for the fair and effective resolution of complaints. The time periods set out in this procedure will be adhered to as strictly as possible but may be varied if necessary. The following step by step guideline sets out the procedures we will adopt and demonstrates how a complaint will be dealt with, once received by us.

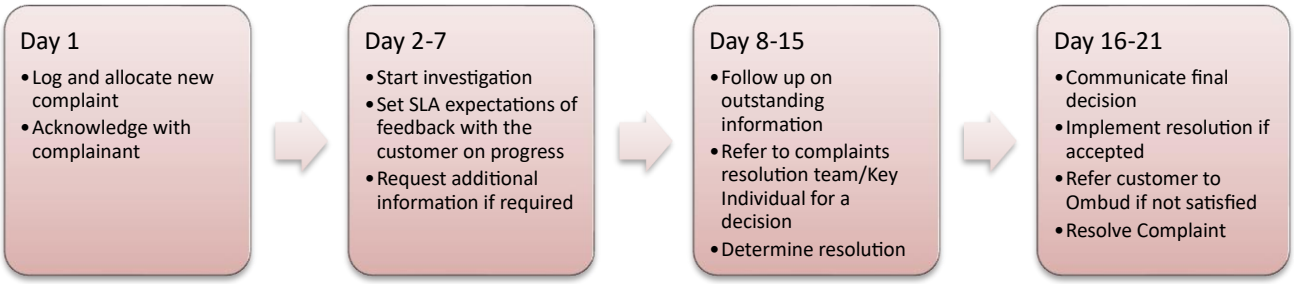


5.2 The complaint will be investigated, and we will revert to you with our preliminary findings **within 7 (seven) working days** from the date of receipt of the complaint. In all instances we will advise you of the reasons for our decisions.



5.3 Complex complaints requirement escalation and referral

The process below is applicable to any complaint that cannot be resolved within the 7 (seven) day turnaround time stipulated above. It remains imperative that all complaints are resolved within the shortest time possible.



5.5 If, after having referred the complaint to the Key Individual, you are still not satisfied with the outcome, we will regard the complaint as being unsatisfactorily resolved. In such a case, you may approach the office of the Ombud for Financial Services Providers or take such other steps as may be advised by your legal representatives.

5.6 In instances where we have not been able to arrive at a resolution **within 6 (six) weeks** after you have submitted your complaint, you may refer the matter to the Ombud. The Ombud acts independently and objectively and has jurisdiction in respect of complaints relating to advice or intermediary services.

5.7 You must, if you wish to refer the matter to the Ombud, do so **within 6 (six) months** from the date of the notice in which we inform you that we are unable to resolve your complaint to your satisfaction. The Ombud will not adjudicate in matters exceeding a value of R800 000.

5.8 We will keep record of the complaint and maintain such record for **5 (five) years** as required by legislation. Please take into consideration that the method of communication chosen by you will determine how quickly we will respond to your complaint.

6. CONTACT DETAILS

6.1 Your complaint and all communications in connection with your complaint must be in writing. All verbal communications made in connection with the complaint must be confirmed in writing within **3 (three) days working days** of the communication.

6.2 You can deliver your complaint in any of the following manners:

E-mail address : compliance@groupserve.online

Physical address : Quayside Office Park, Unit 7, Corner of Gordon & Hedge Street, Knysna, 6570

6.3 Please indicate the following information:

- Your name, surname and contact details;
- A complete description of your complaint and the date on which the financial service which led to your complaint was rendered;
- The name of the person who furnished the financial advice or rendered the intermediary service that led to your complaint; and
- How you would prefer to receive future communications regarding your complaint (i.e. via fax or e-mail).

The complaint will immediately be allocated to a trained and skilled person who is able to properly respond to your complaint (i.e. the Complaint Dispute Facilitator).

6.4 If you are not satisfied with our solution, you may refer the complaint to the Key Individual of our Business. The Key Individual may amend the solution or confirm it.

Name of Key Individuals	: MISHA MCLEAN
E-mail address	: compliance@groupserve.online
Telephone number	: 080 777 7775 or 087 233 8771
Physical address	: Quayside Office Park, Unit 7, Corner of Gordon & Hedge Street, Knysna, 6570

6.5 The Ombud is appointed by the Financial Services Conduct Authority (the "FSCA") to act as an adjudicator in disputes between clients and financial services providers. The referral to the offices of the Ombud must be done in accordance with the provisions of section 27 of the Financial Advisory and Intermediary Services Act 2002 and the rules promulgated in terms of that section.

6.6 The Ombud may be contacted at his offices in Pretoria at the following address:

Physical Address:
Menlyn Central Office Building, 125 Dallas Avenue, Waterkloof Glen, Pretoria 0010
Telephone: +27 12 762 5000 / +27 12 470 9080
Facsimile: +27 12 470 9097 / +27 12 348 3447
Postal Address: P O Box 41, Menlyn Park, 0063
E-mail Address: info@faisombud.co.za
Website: www.faisombud.co.za