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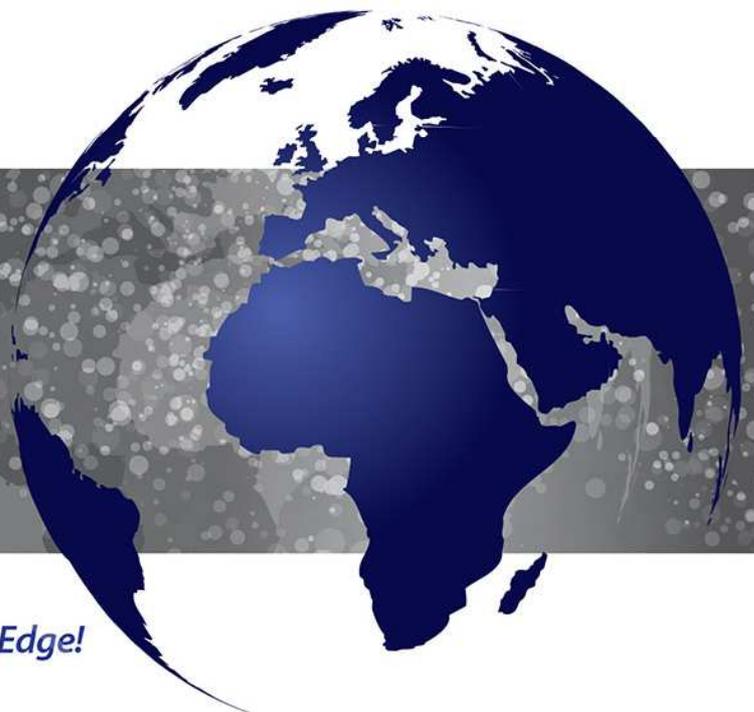
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Complaints Management Policy

An Internal Process for the Resolution of
Complaints

Exceptional service is what gives us *The Edge!*



We at Customer Loyalty Consultants (CLC) value our clients/brokers/3rd parties/suppliers (herein after referred to as the “Complainant” and we hereby state our commitment to handling all complaints effectively and timeously.

First and foremost, the General Code of Conduct issued under the Financial Advisory and Intermediary Services Act 37 of 2002 (FAIS Act) sets out the requirements for the maintenance of a complaints policy.

Secondary to this, the SAIA Code of Conduct requires from its members to adhere to certain minimum standards regarding complaints handling procedures.

In addition to this, the Financial Services Board (FSB) introduced a policy of Treating Customers Fairly (TCF). This regulation will ensure that the following fairness outcomes are delivered.

Outcome 1: Customers are confident that they are dealing with firms where fair treatment of customers is central to the firm culture.

Outcome 2: Products and services marketed and sold in the retail market are designed to meet the needs of identified customer groups and are targeted accordingly.

Outcome 3: Customers are given clear information and are kept appropriately informed before, during and after time of contracting.

Outcome 4: Where customers receive advice, the advice is suitable and takes account of their circumstances.

Outcome 5: Customers are provided with products that perform as firms have led them to expect, and the associated service is both of an acceptable standard and what they have been led to expect.

Outcome 6: Customers do not face unreasonable post-sale barriers to change product, switch provider, submit a claim or make a complaint.

This document, in line with the applicable regulatory and industry requirements, serves to establish an effective internal complaints management system and procedures.

Policy Statement

CLC is committed to:

- Dealing with complaints in a timely and fair manner, with each complaint receiving due consideration in a process that is managed appropriately and effectively;
- Providing complainants with easy access to our complaints resolution process via our office, postal and fax services, telephone, e-mail and the CLC website;
- Ensuring that the internal complaints process is transparent and visible so that complainants have full knowledge of what procedures to follow in order for their complaints to be resolved;
- Ensuring that where a complaint is resolved in favour of the complainant, a full and appropriate level of redress is offered to the complainant, without delay;



- Making available adequately trained staff that possess the necessary skills and expertise to handle complains effectively;
- Establishing a mechanism for the escalation of complaints up to Senior Management. These complaints will be monitored by the Compliance Officer;
- Implementing internal follow-up procedures to ensure improvement of service and avoidance of those occurrences that give rise to complaints (Senior Management will be regularly informed on trends);
- Ensuring that records of complaints are maintained for a period of 5 years

CLC defines a complaint and a query as follows:

A complaint is an expression of dissatisfaction by a complainant, oral or written, about the service or product we have/are providing to them. We will use the following as guidelines to establish if an issue is a complaint:

- Are we outside our SLA? Have we fallen short of standards that we have set ourselves and communicated to our clients?
- Does the issue require escalation of decision?
- Does the complainant clearly state that they are dissatisfied or want to complain?
- When our clients tell us that they are not happy with our service or product and want a response from us
- When the complainant uses any of the complaint channels. E.g. complaints@customerloyalty.co.za, called the office to complain, Hello Peter, Formal Letter of complaint, logged a complaint on our website

A query

- Involves a client/broker asking about details on a policy (e.g. wrong address, errors in the policy) and is dealt with and resolved immediately
- A question. E.g. when will my claim be paid? How long will it take to resolve my issue? How far are you in processing my claim? How did you arrive at my settlement amount?
- An inquiry
- A follow up

When does a query turn into a complaint?

- When a complainant clearly states that they are now dissatisfied and complain

Categories of Complaints

There are two categories of complaints:

- A **General Complaint** as defined above
- In particular, the FAIS Act defines a complaint as follows:



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 the Act, and where it is alleged that the provider or representative has:

1. Contravened or failed to comply with a provision of the Act and that as a result thereof the complainant has suffered or is likely to suffer a financial prejudice or damage;
2. 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;
3. Treated the complainant unfairly

A complaint will therefore only qualify as a **FAIS Complaint** if it complies with one or more of the requirements in the above definition. These complainants will most likely have to do with matters relating to the giving of advice and rendering of intermediary services that are covered in the FAIS General Code of Conduct.

Summary of Complaints Resolution Requirements for CLC

CLC's complaints resolution procedure is published on our website for complainants to view (refer to "Annexure A"). Should a complainant not have access to the internet, a copy of the document can be faxed, e-mailed or collected from any CLC branch.

Complainants may submit their complaints via any of the following options, together with any relevant supporting documentation:

- The CLC Website: www.customerloyalty.co.za under the "Contact Us" option
- E-Mail: complaints@customerloyalty.co.za
- Fax: 086 600 3703
- Telephone: 0861222252
- Post: Customer Loyalty Consultants, PO Box 66322, Highveld, 0169
- Walk-in at office

CLC's acknowledgement and responses to the complainant will be made in writing and sent to the complainant either via post, e-mail or fax depending on the communication preferred by the complainant.

Procedure

The following table describes the required procedures that will be followed when complaints are received:



Step	Activity	Person Responsible
1.	Complaint Received (Via visiting office, post, e-mail, telephonic, Hello Peter, etc.) As soon as a complaint is received by any employee, the complaint must immediately be escalated to Complaints Handler (Departmental Manager)	All Staff
1.1	Claims Handler to log a complaint call on the Workflow Management System (WMS) immediately, making detailed notes on the details of the complaint and uploading all supporting documentation to the Document Warehouse.	Complaint Handler
1.2	Send written acknowledgement of receipt of the complaint to the complainant within 4 working hours of receipt thereof, including the name and contact details of the person who is responsible for resolving the complaint.	Complaints Handler
1.3	Identify the root cause of the complaint and make detailed notes on the WMS.	Complaints Handler
1.4	All complaints to be resolved within 24 working hours (maximum 2 working days if delay in feedback from external party) of the receipt thereof. Note: <ul style="list-style-type: none"> In cases where routine resolution of complaints is not possible, or if the complaint cannot be resolved within 2 working days, or if the complainant is still dissatisfied with the outcome, then the complaint must be brought to the attention of the CEO. If the outcome of the complaint is not favourable to the complainant, full written reasons must be provided to the complainant and update the task on the WMS.	Complaints Handler, CEO
1.5	For complaints that have been effectively resolved, give feedback to the complainant in writing via a formal Complaint Report. Copy of complaint report and proof of report sent to client must be uploaded to the WMS.	Complaints Handlers
1.6	Record the complaint outcome in the complaint task on the system and close the call on the WMS.	Complaints Handlers
1.7	Compile and distribute a monthly summary of the complaints received, with an illustration of the root causes and trends to the Management Team. Discuss trends and or route causes with the relevant business areas. Escalate issues to the Management Team.	Complaints Handlers; Management Team



“ANNEXURE A” – COMPLAINTS RESOLUTION PROCEDURE

CLC COMPLAINTS RESOLUTION PROCEDURE

Customer Complaints

CLC recognises that every client/broker/3rd party supplier (herein after referred to as the ‘Complainant’) has the right to complain. Our complaints handling process affords you the opportunity to do so. Your feedback is valued as it allows us to continuously improve our service and processes, and affords us the opportunity to change bad experiences into positive ones.

How to complaint to CLC

- Your complaint must be in writing (letter, fax, e-mail or website), or telephonically with an employee of CLC
- Provide: Name and Address Details and Policy Number, Claims Number or ID Number of the insured
- Be specific about the complaint and provide all the important facts (including events) that may have a bearing on the complaint
- Provide copies of all documents that have relevance to the complaint (i.e. letters, quotations, previous correspondence etc.)
- Provide proof of any losses sustained where applicable
- Specify a solution/remedial action you believe is required to resolve your complaint

Our Contact Details

The contact details for the CLC Complaints Department are as follows:

Postal Address: PO Box 66322, Highveld, Centurion, 0169
Physical Address: Building 23, Cambridge Office Park, 5 Bauhinia Street, Highveld Techno Park Centurion, Gauteng, 0157
E-Mail: complaints@customerloyalty.co.za
Telephone: 0861222252
Fax Number: 086 600 3703
Website: www.customerloyalty.co.za under “Contact Us”

Our Complaints Process

All complaints will be acknowledged in writing and sent to you either via post, e-mail or fax, depending on communication method chosen by yourself.

- Once the complaint has been received, it will be allocated to the appropriate area for resolution. A letter of acknowledgement for the receipt of the complaint will be despatched within 4 working hours. Please note that delivery of e-mails to CLC cannot be guaranteed, should no acknowledgement of a complaint submitted be received within 4 working hours, kindly contact CLC in order that CLC may follow up on the matter



- Where a complaint cannot be addressed within 24 working hours of receipt thereof, CLC will inform you accordingly
- You will be notified of the outcome of your complaint in writing. If the outcome of the complaint is not favourable to yourself, full written reasons will be provided 2 working days of receipt of your complaint
- If within 2 working days of receipt of your complaint CLC was unable to resolve the complaint to the satisfaction of yourself, and if you wish to pursue the matter further, your complaint may be lodged with the **Ombudsman for Short-Term Insurance**

- The contact details for the Ombudsman for Short Term Insurance are as follows:

Postal Address: PO Box 32334, Braamfontein, 2017
Tel: (011) 726 8900
Tel: 0860 726 890
Fax: (011) 726 5501
E-Mail: info@osti.co.za

- In the same circumstances as above, but specifically where complaints:
 - Relate to a financial service rendered by CLC or a representative of CLC and where it is alleged that CLC or our representative:
 - Has contravened or failed to comply with a provision of the FAIS Act and that as a result therefore the complainant has suffered or is likely to suffer a financial prejudice or loss;
 - Has wilfully or negligently rendered a financial service to the complainant which has, or which is likely to, cause prejudice or damage to the complainant; or
 - Has treated complainant unfairly;

And

- Does not constitute a monetary claim in excess of R800,00 unless CLC has agreed in writing to this limitation being exceeded, or the complainant has abandoned the amount in excess of R800,00. Then:
 - The complainant may be referred to the FAIS Ombudsman; and
 - The complainant should
 - ✓ Refer the matter to the FAIS Ombudsman within six months of receipt of CLC's notification; and
 - ✓ Produce to the Ombudsman CLC's final response as well as the complainant's reason for disagreeing with such final response

- The contact details for the FAIS Ombudsman are as follows:
Customer Contact Division, The FAIS Ombudsman
Celtis House, Eastwood Office Park
Lynnwood, Pretoria

Postal Address: PO Box 74571, Lynnwood Ridge, 0040
Tel: (012) 470 9080 Fax: (012) 348 3447
Tel: 0860 324 766 E-Mail: info@faisombud.co.za

