


COMPLAINTS MANAGEMENT FRAMEWORK
Version: 1.2



OWNERSHIP:

This Policy is owned by **VULINDLELA FINANCIAL SERVICES (PTY) LTD**,
a duly authorised Financial Services Provider (hereunder referred to as the FSP).

As Key Individual of the aforementioned FSP I, Tumi Nkosi hereby confirm the adoption of this policy.

 09/07/2024

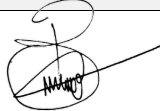
Key Individual Signature & Date

INSTRUCTIONS:

- A nominated Key Individual must acknowledge the FSP's ownership of this policy, by completing the FSP's name on the first page, and signing the document.
- All Key Individuals and persons associated with the governing body of the FSP must confirm the adoption of policy, by signing the document below (print additional copies of this page should the need arise)
- All employees must read and confirm that they understand the contents of policy, by signing the personnel acknowledgement page (print additional copies of this page should the need arise)
- Utilise the register on the last page of this document to record any reports submitted to the Financial Advisory and Intermediary Services
- After implementing the policy, retain a hardcopy of the document as part of your compliance file
- This policy must be read and understood in conjunction with the FAIS Act.

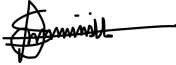
POLICY ADOPTION:

By signing this document, I acknowledge the FSP's adoption of this Policy


Name & Date	Key Individual Signature
Tumi Nkosi 09/07/2024	

PERSONNEL ACKNOWLEDGEMENT:

I acknowledge that I have read and understand the contents of this Policy

Name & Date	Staff Signature
Dave Msibi 09/07/2024	

I acknowledge that I have read and understand the contents of this Policy

Name & Date	Staff Signature
Sibusiso Nkosi 26/07/2024	

I acknowledge that I have read and understand the contents of this Policy

Name & Date

Staff Signature

I acknowledge that I have read and understand the contents of this Policy

Name & Date

Staff Signature

I acknowledge that I have read and understand the contents of this Policy

Name & Date

Staff Signature

I acknowledge that I have read and understand the contents of this Policy

Name & Date

Staff Signature

1. DEFINITIONS

In this document, unless inconsistent with or otherwise indicated by the context, the following terms will have the meanings assigned to them hereunder:

“Company” means Vulindlela Financial Services (Pty) Ltd with registration number 2013/234187/07, a private company with limited liability duly incorporated in accordance with the laws of the Republic of South Africa;

“Complaint” means an expression of dissatisfaction to Vulindlela Financial Services (Pty) Ltd and/or our product provider (to the knowledge of the Insurer) relating to a policy or service which indicates/alleges, that:

- The Company, the Insurer or their service provider failed to comply with an agreement, a law, a rule, or a code of conduct;
- The Company, the Insurer or their service provider’s maladministration or willful/negligent action or omission caused the person harm, prejudice, distress or substantial inconvenience;
- The Company, the Insurer or their service provider has treated the person unfairly;
- Regardless whether submitted together with or in relation to policyholder query;

“Complainant” means a person acting on their behalf, who has a direct interest in the agreement, policy or service, and includes a-

- policyholder or their successor in title;
- beneficiary or their successor in title;
- person whose life is insured under a policy;
- person that pays a premium;
- member of a group scheme or and
- potential policyholder or potential member of a group scheme-whose dissatisfaction relates to the relevant application, approach, solicitation, advertising or marketing material.

“Customer” of a financial institution means any user, former user or beneficiary of one or more of the financial institutions financial products or services and their successors in title.

“Customer query” means a request to the financial institution by or on behalf of customer pr prospective customer, for information regarding the financial institutions products, services or related processes, or to carry out a transaction or action in relation to any such product or service. A query will not b treated as a complaint unless some form of dissatisfaction is expressed.

“Framework” means the Complaints Management Framework.

“Rejected” means that a complaint was not upheld. The Insurer and the Company regard the complaint as finalised after advising the complainant that it does not intend to take any further action to resolve the complaint- Incl. complaints regarded as unjustified or invalid/ where the complainant does not accept or respond to proposals to resolve the complaint.

“Compensation payment” means to compensate a complainant for a proven or estimated financial loss incurred because of the Insured or the Company’s wrongdoing, the Insurer and/or Company accepts liability for having caused the loss concerned, excluding:

- a goodwill payment;
- payment contractually due in terms of a policy; or
- refund of an amount which was not contractually due

“Goodwill payment” means payment (monetary or in the form of a benefit or service as an expression of goodwill aimed at resolving a complaint where the Insurer or Company do not accept liability for any financial loss to the complainant.

“Days” means business days

“Reportable complaint” means any complaint (as per the definition above) unless-

- upheld immediately by the person who initially received the complaint;
- upheld within the Insurer or Company’s ordinary process for handling policyholder queries;
- provided that such process does not take more than five business days from the date the complaint is received; or
- submitted to or brought to the attention of the Insurer or Company in such a manner that the Insurer or Company do not have a reasonable opportunity to record such details of the complaint.

“The Insurer” means Aon Risk Solutions, insured by Old Mutual Limited with registration number 1970/006619/ 06 a public incorporated in accordance with the laws of the Republic of South Africa.

“Upheld” means that a complaint has been finalised wholly or partially in favour of the complainant and-

- the complainant has explicitly accepted that the matter is fully resolved; or
- it is reasonable for the Insurer to assume that the complainant has accepted; and
- all undertakings made by the Insurer to resolve the complaint have been met or the complainant has explicitly indicated its satisfaction with any arrangements.

2. INTRODUCTION:

Customer satisfaction is an integral part of Vulindlela Financial Services culture, and we appreciate that our clients bringing their concerns to our attention. By doing so it will not only allow us to correct defective service delivery, but most importantly allow us to enhance the service excellence that we at Vulindlela Financial Services aspire to bring to you as a valued client. The Framework serves to meet the requirements of relevant legislation. It needs to ensure fair treatment of policyholders and beneficiaries and must be reviewed regularly.

3. OBJECTIVE AND KEY PRINCIPLES:

1. The Framework must be maintained, operate adequately and effectively and ensure that:
 - is proportionate to nature, scale and complexity of the Company’s business and risks;
 - is proportionate for the business model, policies, services, policyholders and beneficiaries of the Insurer and the Company;
 - enables complaints to be considered after taking reasonable steps to gather and investigate all relevant info and circumstances, with due regard to the fair treatment of complaints; and
 - does not impose unreasonable barriers to complaints
2. The objective of this framework is to ensure that customers are provided with the best possible complaints resolution service and to align the actions of the personnel of the Company with the prescriptions of the law regarding Complaints management in a Financial Service Industry, as regulated.
3. This framework will be binding on all employees of the Insurer and the Company, working within the borders of South Africa, who deal in the financial services environment as it pertains to the jurisdiction of the Financial Sector Conduct Authority (FSCA) and in accordance with relevant legislation. The framework also meets the requirements of the Financial Advisory and Intermediaries Act, 2002 (FAIS), which requires a Complaints Policy, Accordingly there is not a separate Complaints Policy.
4. Vulindlela Financial Services is committed to :
 - Resolving customer complaints in a fair manner for customers, our business and employees;

- Ensuring that customers are fully informed of complaints procedures;
- Ensuring access to our complaints resolution facilities by way of email, website or telephone;
- Ensuring the training of employees to deal with complaints and escalate matters where required;
- Dealing with complaints timeously, with each complaint being treated on a case-by-case basis, based on the merits of the matter;
- Where a complaint is resolved in favour of a client, Vulindlela Financial Services will offer full and appropriate redress;
- Informing clients of their right to refer their complaints to the relevant Ombudsman should a complaint not be resolved to their satisfaction;
- Maintaining records of all complaints received for a minimum of 5 years or as required by legislation.

4. ALLOCATION OF RESPONSIBILITIES:

1. The Complaints Manager within Vulindlela Financial Services is responsible to ensure that all complaints lodged are treated in line with this framework;
2. The Complaints Manager will ensure that adequate resources are allocated to complaints handling and that any person dealing with complaints are:
 - Adequately trained;
 - Experienced in complaints handling and appropriately qualified;
 - Not be subjected to a conflict of interest and;
 - Be adequately empowered to make impartial decisions or recommendations.

5. SUBMITTING A COMPLAINT:

1. All complaints should be referred to the Complaints Manager using the following details
 - complaints@vulindlelafs.co.za or;
 - 084 500 0051
2. If possible, complaints should be submitted as follows:
 - In writing, by completing the complaints form (Annexure A) available on our webpage www.vulindlelafs.co.za and email it to complaints@vulindlelafs.co.za and attaching supporting documents relevant to the complaint to enable Vulindlela Financial Services to attend to the complaint concern timeously
 - If not possible, call 084 500 0051
 - Vulindlela Financial Services will also monitor the relevant social media platforms
 - Once a complaint is received an acknowledgement of receipt is sent to the complainant including reference to this Complaints Management Framework detailing the process to be followed (within a reasonable time after receipt). Including:
 - a. Contact details of the person/department that will be handling the complaint and;
 - b. Timelines
 - c. Details of the internal complaints escalation and review process and details of the relevant Ombudsman where applicable.

6. PERFORMANC STANDARDS, REMUNERATION AND REWARDS STRATEGIES:

1. An acknowledgement of receipt of the complaint will be provided within 72hrs to the complainant.

2. All complaints will be investigated and resolved in a fair and professional manner and feedback will be provided to the complainant within 15 days of the date of receipt of your initial complaint- provided that all information required has been provided and/ or an investigation has been completed.
3. In cases where further information, assessment or investigation is required, agree with the complainant to a reasonable timeframe not exceeding 20 days of receipt of the complaint.
4. Where a complaint has been upheld, ensure that a full and appropriate level of corrective action is offered without delay. Any commitment to make payment or to take action is carried out without delay and within an agreed timeframe.
5. Where a complaint is rejected, Vulindlela Financial Services, provides the complainant with clear and adequate reasons for the decision and any applicable escalation or review processes as well as details of external dispute resolution entities that may be utilised.
6. All staff are measured in terms of key performance areas that includes complaints management and are remunerated and rewarded accordingly.

7. CATEGORISATION OF COMPLAINTS/RECORD KEEPING, MONITORING & ANALYSIS :

1. Complaints are categorised, recorded and reported on and includes the following:
 - design of a policy or related service (incl. premiums or other fees or charges);
 - information provided to policyholders;
 - advice;
 - policy performance;
 - service to policyholders (including complaints relating to premium collection or lapsing of policies);
 - policy accessibility, changes or switches;
 - complaints handling;
 - complaints relating to insurance risk claims, including non-payment of claims; and
 - other complaints.
2. All reportable complaints are categorised, recorded and reported by identifying the category to which it most closely relates.
3. Complaint reports are scrutinized and analysed on an ongoing basis and used to manage conduct risk and improve outcomes to policyholders.
4. The following is recorded in respect of each reportable complaint-
 - a. relevant details of the complainant and the subject matter of the complaint;
 - b. copies of all relevant evidence, correspondence and decisions;
 - c. the complaint categorisation; and
 - d. progress and status of the complaint, incl. whether turnaround times were adhered to.
5. The following ongoing data regarding the number of reportable complaints are maintained:
 - a. received, upheld, outstanding / rejected (and reasons for the rejection);
 - b. escalated to the internal complaints escalation process; and
 - c. referred to an Ombud and their outcome.
6. Details of compensation payments and goodwill payments, including the amounts are recorded.

7. Complaints that are not reportable complaints are analysed to identify noteworthy trends in relation to the types, volumes or incidence to manage conduct risks.

8. COMPLAINTS ESCALATION AND REVIEW PROCESS:

1. Should a complainant not be satisfied with the outcome of a complaint, the complainant has the right to have the decision reviewed by another employee of Vulindlela Financial Services who has the appropriate knowledge, expertise, experience, seniority and authority to deal with the review or escalation process.
2. If a complainant wishes to have a decision regarding a complaint reviewed:
 - Vulindlela Financial Services will treat it as a Dispute;
 - When a decision has been made, respond to the complainant in writing giving:
 - a. Reasons for the decision;
 - b. Provide information about how to access external dispute resolution or policyholder recourse mechanisms, and the time frame in which to do so.

9. SUBMITTING A COMPLAINT:

1. All complaints lodged with the Ombudsman for Short Term Insurance, Ombudsman for Long Term Insurance and all legal proceedings in respect of the Insurer, the Policies/or the Insurance Business must be dealt with exclusively by the Insurer.
2. Vulindlela Financial Services will give all assistance and cooperation to the Insurer in respect of any of the above and promptly furnish all documents/information and give all representations required in order to enable the Insurer to defend any such legal proceedings, claims, potential claims, complaints or potential complaints
3. Vulindlela Financial Services shall within 24 (twenty -four) hours of receipt of a complaint, a notification from the Ombudsman for Short Term Insurance, Ombudsman for Long Term Insurance, or any other legal document pertaining to the Insurer, The Insurance Business and /or the Policies, provide a copy of such documents and any supporting documents to the Insurer

4. The relevant details of the Insurer:

Safire Insurance Company Ltd
 Stalker Hutchinson Admiral (PTY) Ltd Compliance: Mike Willmore
 Redlands Estate
 No 1 George Mc Farlane Lane
 Wembley, Pietermaritzburg

5. Should the complainant not be satisfied he/she may redirect the complaint and all supporting documents to the following parties in writing, within a 6-month period of receipt of such feedback from Vulindlela Financial Services

The Short-Term Insurance Ombudsman:

Telephone: (011)726-8900
 Fax: (011)726-5501
 Website:www.osti.co.za

The Long-Term Insurance Ombudsman

Telephone: (021) 657-5000

Fax: (021) 674-0951

Website: www.ombud.co.za

6. The Ombudsman's task is to act as a "mediator" or informal arbitration, and he/she does not represent either of the parties of the dispute

Important points to remember

- Vulindlela Financial Services encourages the complainant to complain to the Company first. If the complaint is not resolved to the satisfaction of the client, refer the matter to the Ombudsman's office.
- The Ombudsman's decisions are binding on the Company and not on you as the client.
- The Ombudsman's Office is an independent office.
- The Ombudsman's decision can be based on law and equity.
- The Ombudsman's Office does not give legal advice.
- The service is free to insured consumers.
- The Short-Term Insurance Ombudsman offers consumers a "no risk" mechanism to resolve disputes with insurer's.
- The office can assist consumers with certain personal lines short-term insurance as well as with limited commercial insurance matters.
- The Long-Term Insurance Ombudsman mediate in disputes between Insurers and Policyholders
- The office can assist clients with communication/administration failures, lapsed policies, repudiation due to non-disclosures and alleged unfair rejection of claims.
- Refer to the websites as noted above for more details .

7. The FAIS Ombudsman:

Telephone:(012)470-9080

Fax: (012) 348- 3447

Website:www.faisombud.co.za

The FAIS Ombud deals with complaints submitted to the Office by a specific client against a financial service provider

Refer to the website as noted above for more details

8. The Registrar of Short-Term and Long-Term Insurance:

Telephone:(012)428-8000

Fax: (012) 422- 2979

Website:www.fsca.co.za

The Registrar's duties are wide ranging and must ensure that Insurers comply with the following, however not limited to:

- Submission of statements and accounts;
- Statement of liabilities;
- Statement of assets;
- Solvency margin regulations;
- Separation of assets;

- Commission rates for intermediaries.
- Refer to the website as noted above for more details.

9. Institution of legal action

After receipt of the notification to repudiate or dispute the claim or the quantum of the claim, the complainant has six months within which to institute legal action.

Conclusion:

Vulindlela Financial Services aims to consistently deliver professional service and therefore we invite any feedback or suggestions as to how we can improve our complaints resolution process. Please send your suggestions to complaints@vulindlelafs.co.za

Vulindlela Financial services Management

Annexure A: COMPLAINT FORM

Insured's Information

Insured Name : _____ Contact Number: _____

Email Address: _____

Policy No: _____ ID No: _____

Broker: _____

Complaint Information:

Complaint Date: _____ Received By: _____

Complainant Name: _____ Contact No: _____

Type of Complaint:

- Service delivery
- Delay in claim settlement
- Lack of feedback
- Claim rejection
- Excess
- Policy Documentation
- Cover
- Other (please describe in detail)

Please describe in detail the reason/s for your complaint:

Please provide a detailed desired outcome you would like to achieve

Please indicate any other factors you would like us to consider

Required documentation (if applicable). Please provide all documentation that you believe would assist us in speedily resolving your complaint. Please tick relevant attachments

- Policy Schedule
- Rejection Letter
- Excess Letter
- Other

If Other, please specify:

Please indicate whether this is the first complaint of this nature or whether you have previously complained to any other party regarding this matter and if so, please provide full details of the outcome thereof:

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DECLARATION:

Our complaints management framework is based on provisions as set out in relevant legislation and the principles of Treating Customers Fairly.

On receipt of the required information, we will promptly investigate your complaint and provide you with written feedback

We aim to consistently deliver a professional service, and therefore we invite any feedback or suggestions as to how we can improve our complaints resolution process. Please send your suggestions to complaints@vulindlelafs.co.za

Signature: _____ Date: _____