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| 1.1 | Purpose of document: | To update the Complaints Management Policy in line with the amended Policy Holder Protection Rules |
| 1.2 | Responsible person: | Head: Legal and Compliance |
| 1.3 | Date of report: | February 2022 |
| 1.4 | Required Action: | None |

Complaints Management Framework for Viva Cover (PTY) Ltd (“Viva Cover”)

Applicable to all staff and customers of Viva Cover

Version 5.2

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Policy ownership and review	<p>Policy approval and review roles</p> <p>Policy administrative roles</p> <ul style="list-style-type: none"> • Policy Owner: Head: Legal and Compliance • Policy approvers: Audit and Risk Committee • Document owner: Head: Legal and Compliance • Review and approval schedule <p>The complaints management policy must be reviewed each year by the Risk and Compliance Committee ("RCC").</p>
Policy control	<p>Control history</p> <ol style="list-style-type: none"> 1. Complaints Management Policy v5.1 – April 2019 – PPR Amendments 2. Complaints Management Policy v5.2 – February 2022 – Review
Objective of the policy	The purpose of the Complaints Management policy is to inform clients of how you can make use of our complaints management system, to their advantage.
Principles of Policy	<p>The policy should set out:</p> <ul style="list-style-type: none"> • The roles and responsibilities of those affected • What reporting and governance structures are required
Scope of application	All Viva Cover staff, representatives and clients
Roles and responsibilities	<ul style="list-style-type: none"> • It is the role of the RCC to set the Complaints Management Policy • It is the role of the RCC, ultimately, to ensure the Policy is being followed • It is the role of the Head of Operations and the Internal Compliance Officer to track and manage the process.
Policy standards and/or requirements	Regular reviews of the policy and audits performed by Internal Audit are required to monitor whether the policy is being upheld.

1. Purpose of this policy:

We are a licensed Financial Services Provider with the authority to provide financial advice and intermediary services in terms of the Financial Advisory and Intermediary Services Act. As such we have certain specific duties to you, our clients.

One of these duties is to offer you a formal complaints management system, which will enable you to exercise your rights as provided for in the Financial Advisory and Intermediary Services Act and the Short-term Insurance Act where applicable. Effective management of customer complaints is a vital component of Treating Customers Fairly. The purpose of this document is to provide all staff and customers with a comprehensive understanding of how to deal with and lodge complaints in the most effective manner possible.

It is important to record all complaints to ensure that we learn from the outcomes when we analyse those complaints. This document recommends practical procedures and processes for reviewing and resolving customer complaints in a courteous, timely, effective and fair manner; standards of which are aligned to the Complaints Management Discussion Document which forms part of the TCF ('Treating Customers Fairly') Regulatory Framework. This document will be reviewed on an annual basis.

Effective management of customer complaints is key to supporting our aim in which dissatisfied customers can be transformed into advocates or loyal supporters of our business which ultimately builds trust and lasting relationship sustainability.

In line with the TCF principle aims, we strive to raise standards in the way we operate, by introducing changes that will benefit our customers and increase their confidence in our brand.

Complaints Management is a key component of TCF Outcome 6 which states that:

"Customers do not face unreasonable post-sale barriers imposed by firms to change product, switch providers, submit a claim or make a complaint."

This document serves as a guideline to achieve the following throughout the complaint management process:

- To understand what constitutes a complaint (regulatory definition) so that there is a consistent understanding across the FSP. This is especially important when capturing complaints onto the system
- To set consistent standards and requirements for us to implement internal complaints management processes, including record keeping, monitoring and analysis
- To thoroughly investigate the complaint
- To identify possible service breakdowns
- To ensure fair treatment of customers in line with the TCF principles
- To make informed decisions
- To ensure timely resolution
- To conduct root cause analysis
- To put forward and manage possible solutions through corrective action improvements
- To ensure that our complaints process is fair, transparent, accessible and visible to our customer

2. Policy Statement:

Viva Cover is committed to providing its clients with quality service and undertakes to manage the affairs of its clients in such a way that it would not be necessary to have a complaint about our service, integrity and commitment. However, should it happen that a client does have a complaint, we undertake to:

- 2.1. Resolve client complaints in a way that is fair to our clients, our FSP and our staff;
- 2.2. We undertake to inform all our clients of the procedures established for the internal resolution of their complaints, details of which will be given to them in writing;
- 2.3. We undertake to ensure easy access to our complaints resolution process at our offices. Complaints can be submitted by e-mail, telephone, Hellopeter portal and via the complaints inbox portal;
- 2.4. The departments responsible for resolving complaints are the Policy Holder Services department (PHS) and Compliance department;
- 2.5. Empower and properly train our people to deal with complaints, as well as with the escalation of complaints;
- 2.6. If necessary, appoint an independent mediator to resolve the complaint to the benefit of both the client and our FSP;
- 2.7. Deal with complaints in a timely and fair manner, with every complaint receiving proper consideration in a process that is managed appropriately and effectively by the responsible staff member;
- 2.8. Offer appropriate remedies in all cases where a complaint is resolved in favour of a client;
- 2.9. Inform clients of their right to refer their complaints to the FAIS Ombud, should a complaint not be resolved to their satisfaction, within six weeks from the date on which the complaint is received;
- 2.10. Maintain records of all complaints received for a period of 5 years, which will specify the outcome of all the complaints lodged;
- 2.11. If so required, implement follow-up procedures to:
 - 2.11.1. Implement remedial actions to prevent similar complaints from occurring;
 - 2.11.2. Improve services and procedures where necessary by resolving the complaints within a reasonable time before the six-week period.

3. Definitions and Terminology:

- 3.1. **“Complainant”**: is a person / someone 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.
- 3.2. **“Complaint”**: an expression of dissatisfaction to an insurer / their service provider (to the knowledge of the insurer) relating to a policy or service which indicates / alleges, that –
- The insurer or their service provider failed to comply with an agreement, a law, a rule, or a code of conduct;
 - The insurer or their service provider’s maladministration or wilful / negligent action or omission, caused the person harm, prejudice, distress or substantial inconvenience;
 - the insurer or its service provider has treated the person unfairly;
 - regardless whether submitted together with or in relation to a policyholder query.
- 3.3. **“Rejected”**: means that a complaint was not upheld – Insurer regards 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.
- 3.4. **“Compensation payment”**: to compensate a complainant for a proven or estimated financial loss incurred as a result of the insurer’s wrongdoing - insurer accepts liability for having caused the loss concerned – excluding:
- goodwill payment;
 - payment contractually due in terms of a policy; or
 - refund of an amount which was not contractually due.
- 3.5. **“Goodwill payment”**: a payment (monetary or in the form of a benefit or service as an expression of goodwill aimed at resolving a complaint, where the insurer does not accept liability for any financial loss to the complainant.
- 3.6. **“Reportable complaint”**: any complaint (as per the definition above) unless–
- upheld immediately by the person who initially received the complaint;
 - upheld within the insurer’s ordinary processes 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 in such a manner that the insurer does not have a reasonable opportunity to record such details of the complaint.
- 3.7. **“Upheld”**: 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 so 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.

4. Submitting your complaint:

4.1. Administrator: Viva Cover

Give us a chance to resolve the matter. To ensure our focused attention, please use the following contact details:

Postal address: Postnet Suite 33, Private Bag X75, Bryanston, 2021

Call: 0860 109 529

Email: Complaints@vivacover.co.za

Fax: 086 154 9541

4.2. Insurer: Guardrisk

You may also contact the Insurer. Their contact details are as follows:

Postal address: PO Box 786015, Sandton, 2146

Call: 0860 333 361

Email: Complaints@guardrisk.co.za

4.3. FAIS Ombudsman

If complaints about our service are not resolved, we are accountable to the FAIS Ombud.

Their contact details are as follows:

Postal address: PO Box 74571, Lynnwood Ridge, 0040

Call: 0860 324 766

Email: info@faisombud.co.za

Fax: +27 12 348 3447

4.4. The Ombudsman for Short-Term Insurance

If complaints about our products don't get resolved, we are accountable to the Short-Term Insurance Ombud. Their contact details are:

Postal address: Private Bag X 32334, Braamfontein, 2017

Call: 011 726 8900

Email: info@osti.co.za

Fax: +27 11 726 5501

4.5. The Ombudsman for Long-Term Insurance

We are also accountable to the Long-Term Insurance Ombud. Their contact details are:

Postal address: Private Bag X45, Claremont, 7735

Call: 0860 103 236

Email: info@ombud.co.za

Fax: +27 21 674 0951

Should you wish to lay a complaint with us please follow the procedure as outlined below:

If any of our representatives:

Viva Cover (Pty) Ltd is an authorised Financial Services Provider (FSP Number: 42787) | Company Registration Number: 2007/018990/07 | VAT Registration Number: 4530243569 | Directors: Donovan Bergsma, Sean Bergsma | Registered address: Quadrant 4, The Centenary Building, 30 Meridian Drive, Umhlanga New Town, 4319 |

Postal address: PostNet Suite 33, Private Bag X75, Bryanston, 2021

- did not comply with the Financial Advisory and Intermediary Services Act and that you suffered financial prejudice as a result;
- intentionally or negligently gave or rendered a financial service which caused you prejudice or damage or is likely to cause you prejudice or damage;
- treated you unfairly,

The Complaint can either be made verbally or in writing and forwarded to our complaints department. Please include the following details with your complaint:

- (a) Your name, surname and contact details;
- (b) A complete description of your complaint;
- (c) The name of the person who provided you with financial advice or an intermediary service;
- (d) The date on which the matter complained about occurred;
- (e) All documentation relating to your complaint;
- (f) How you would prefer to receive communication from us regarding your complaint i.e. by e-mail, telephone, fax and post. Please provide us with the e-mail address, telephone number, fax number or address where you would prefer to receive such communication.

5. Complaints System

The complaints system has been adapted to accommodate the requirements listed below from the FSCA. It is therefore crucial that this information forms part of the minimum requirements for capturing complaints from any source. The following information must be captured:

- 5.1. All relevant details of the complainant and the subject matter of the complaint, including copies of all relevant evidence, correspondence and decisions.
- 5.2. Appropriate TCF-aligned categorisation of complaints (to include the 9-minimum required categories)

Financial institutions should categorise, record and report on complaints by identifying the TCF Outcome category to which a complaint most closely relates and group complaints accordingly. Paragraphs 6.1 to 6.9 provide more detail on the minimum complaints categories required and set out examples of types of complaints which would typically fall under each category.

For some of the TCF Outcomes (Outcomes 5 and 6), additional subcategories are proposed. There is, therefore, a total of nine minimum categories which should be used, wherever applicable.

- 5.3. Progress and status of the complaint, including whether such progress is within or outside any relevant prescribed timelines or internal service levels.
- 5.4. Details of numbers of complaints received, complaints upheld, rejected complaints, complaints escalated by complainants to the internal review function (where applicable), complaints referred to an Ombud, compensation payments and goodwill payments.

6. Complaints Categories

Below is a list of the main complaint reasons per value chain category to ensure accurate and aligned capturing. These complaint categories can then be condensed into the 9 complaint types, as prescribed by the FSCA:

- 6.1. Complaints relating to the design of a policy or related service, including the premiums or other fees or charges related to that policy or service e.g. Premiums too high, insufficient cover;
- 6.2. Complaints relating to information provided to policyholders e.g. incorrect inception date, no or poor response;
- 6.3. Complaints relating to advice;
- 6.4. Complaints relating to policy performance;
- 6.5. Complaints relating to service to policyholders, including complaints relating to premium collection or lapsing of policies;
- 6.6. Complaints relating to policy accessibility, changes or switches;
- 6.7. Complaints relating to complaints handling;
- 6.8. Complaints relating to insurance risk claims, including non-payment of claims; and
- 6.9. Other complaints.

7. TCF-aligned Complaint Categories

The categories for TCF outcomes are listed below with possible examples of the type of complaints that will form part of each category. These reasons are not fixed to a specific outcome and the outcome selected may differ according to the circumstances of the complaint e.g. 'Inadequate cover type' - this could be due to the design of the product or it could be a sales error where the incorrect cover level was sold or offered. The complaint system accommodates the manual capture of the outcome breached based on the complaint received. Often, more than one outcome is breached and therefore provision has been made to capture more than one outcome per complaint.

Examples of complaint reasons into the various TCF outcomes

Effective monitoring and analysis of complaints is a key tool to identify, manage and mitigate TCF-related and market conduct risks. Proper monitoring and analysis will maximise business value through the learnings created from analysis of complaint outcomes.

The recording, monitoring and analysis process must provide for an adequate level of regular reporting to senior management levels.

Firms need to embed a qualitative and quantitative analysis which can be used to identify positive and negative trends for complaints received.

A standardized Monitoring and Analysis template has been developed so that there is consistency in complaints analysis. The template will be used to identify:

- Root cause analysis common to the categories of complaints
- Failings in control systems
- Detection of poor staff or service provider performance, lack of skills or misconduct
- Tracking of TCF delivery
- Identifying possible solutions

Risk management, internal audit and compliance functions will provide management reporting on the effectiveness and compliance with the requirements from the FSCA.

8. Reporting/ Root Cause Analysis/ Continuous Improvement

The FSCA are in the process of developing a more detailed proposal regarding regulatory complaints reporting which will be in a prescribed format. Proposed reporting templates are currently being considered by the FSCA.

The FSCA believes that the reputational impact of meaningful public disclosure can act as a deterrent to unfair customer treatment, and an incentive for companies to compete over the quality of the customer experiences they deliver. This could mean that Viva Cover will be required to report on our complaints in a public forum in a format prescribed by the FSCA.

The report will consist of the requirements given by the FSCA for all FSPs to abide by. In the interim, and to enable a more streamlined process for reporting, the central complaint system has been adjusted to ensure that the relevant fields are available for capture and reporting.

- For every complaint received, it is required that we do a root cause analysis to understand the reason for the complaint and put measures in place to mitigate these risks posed and generating the complaints.
- When recording complaints, Viva Cover may pick up trends for the same type of complaints or numerous complaints relating to a certain area of the business. Once the root cause analysis is done, any concerns raised, or risks identified will need to be corrected within the business. This is known as continuous improvement.
- There may be situations where we proactively identify gaps in our processes, systems, training or product without a customer lodging a complaint. This can follow the same process to highlight the risks and take action to remedy the situation.

9. Training

The requirements for complaint handling are guided by the FSCA Treating Customer Fairly Complaints Management Discussion Document. Employees attend regular TCF training sessions in order to maintain their awareness of the TCF outcomes and to ensure that the TCF principles are consistently applied in the day-to-day activities of the business.

10. Our Complaints Procedure:

To ensure a quick and appropriate response to complaints, the following process has been implemented:

- 10.1. As mentioned above, a complaint can either be written or telephonic and must clearly state the reason for the complaint and any loss/ damage suffered. Where appropriate you will forward any relevant supporting documentation. The complaint can be submitted to us via e-mail, PHS and HelloPeter portal and via the complaint's inbox portal.
- 10.2. Upon receipt of the complaint, the complaints department will acknowledge receipt thereof to the complainant either by email or SMS within 3 (three) working days.

- 10.3. The complaint will then be forwarded to the relevant department to investigate whether it is legitimate and if need be, a specific staff member will be assigned the responsibility for the resolution thereof.
- 10.4. If further information is required, the staff member will request clarity or supporting (additional) documentation from the complainant. The request for information/ clarity will also include the expected number of days to resolve the complaint following the receipt of the information/ documentation and the name and contact details of the staff member responsible for the resolution of the complaint.
- 10.5. Where additional information/ documents have been requested from the complainant and the information is not forthcoming; a reminder will be sent within 5 (five) working days following the initial request.
- 10.6. We will respond to you within 21 (twenty-one) days with our final decision regarding your complaint, provided that all information required has been received and/or an investigation has been completed. The maximum turn-around time for any complaint is 30 (thirty) days from receipt of the initial complaint if all the necessary documentation and or information has been received. The complainant will be kept informed of the progress of the complaint on a regular basis.
- 10.7. Once the investigation is concluded the decision, will be communicated by means of telephone and email stating all the facts and conclusion of the complaint to the complainant.
- 10.8. In the case where the complainant is not fully satisfied with the conclusion of the complaint, the objection should be made either telephonically or in writing and additional information or documents, if any, should be provided. The objection will then be referred to the Head: Compliance for further investigation.
- 10.9. The Head will investigate the complaint considering new documentation or information provided. The complaint will then be referred to the Risk and Compliance Committee who will perform a reassessment of the complaint and either endorse or denounce the conclusion. Detailed written correspondence on the conclusion of the investigation will be communicated to the complainant within 5 (five) working days of receipt of the objection with full details of the evidence at hand and the basis of the conclusion.
- 10.10. The Risk and Compliance Committee reserves the right to consult or refer the matter to the appropriate experts for further investigation. The complainant will be kept informed of all possible delays and the expected date of resolution.
- 10.11. If unable to resolve the complaint within 6 (six) weeks of logging the complaint in the Complaints Register or where Viva Cover has been unable to resolve the complaint to the full satisfaction of the complainant, then the Head: Compliance will notify the complainant accordingly and advise the complainant of their right to:
 - 10.11.1. Refer the complaint to Guardrisk for further investigation; or
 - 10.11.2. Refer the complaint to the Ombudsman's Office. The complainant should do so within 6 (six) months of receipt of such notification if the complainant wishes to pursue the matter.

11. Engagement with the Ombud

- 11.1. Viva Cover is committed to transparent engagement with any relevant Ombud in relation to its complaints.
- 11.2. We will monitor determinations, publications and guidance issued by any relevant Ombud with a view to identifying failings or risks in the organisation's policies, services or practices
- 11.3. We will maintain open and honest communication and co-operation between itself and any Ombud with which it deals.
- 11.4. We are also committed to resolving a complaint before a final determination or ruling is made by an Ombud, or through the organisation's internal escalation process, without impeding or unduly delaying a complainant's access to an Ombud.
- 11.5. We will ensure that it has the appropriate processes in place to ensure compliance with any prescribed requirements for reporting complaints related information to any designated authority, or to the public as may be required by the Regulator.

12. Risk and Compliance Committee Approval

The Risk and Compliance Committee has approved the Viva Cover Complaints Management Policy.