

COMPLAINTS RESOLUTION MANUAL

FSP NAME	Groups Are Us (Pty) Ltd
FSP NUMBER	45735
FSP ENTITY	Credit Life And Funeral Cover Insurance
PHYSICAL ADDRESS	Suite 9a, Monpark Building 76 Skilpad Road Monument Park Pretoria Gauteng 0181
TELEPHONE NO	0861 27 3342
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AUTHOR	Caitlin Kramer

Contents

1.	OVERVIEW	3
2.	PURPOSE	3
3.	OBJECTIVES	3
4.	DEFINITIONS.....	3
5.	PROCESS OVERVIEW	5
6.	PROCESS.....	5
6.1	HOW TO MAKE A COMPLAINT?.....	5
6.2	WHO WILL HANDLE YOUR COMPLAINT?.....	6
6.3	RECEIVE AND CLASSIFY	6
6.4	RISK.....	6
6.5	CATEGORISATION.....	7
6.6	ACKNOWLEDGE	9
6.7	INVESTIGATE.....	9
6.8	RESOLVE AND CONFIRM.....	9
6.9	RESPOND TO CUSTOMER	9
6.10	FOLLOW UP AND REVIEW.....	10
6.11	QUALITY ASSURANCE AND CHECKS.....	10
7.	REPRESENTATIVES AND SUPPLIERS	10
8.	DECISIONS RELATING TO COMPLAINTS.....	11
9.	COMPLAINTS ESCALATION AND REVIEW PROCESS.....	11
10.	RECORD KEEPING, MONITORING AND ANALYSIS.....	11
11.	COMMUNICATION WITH COMPLAINANTS	12
12.	ENGAGEMENT WITH OMBUD AND REPORTING.....	13
13.	IMPORTANT CONTACT DETAILS.....	14
	ANNEXURE A – COMPLAINTS RESOLUTION PROCESS	15
	ANNEXURE B – ACKNOWLEDGEMENT LETTER.....	21
	ANNEXURE C – LETTER WHERE OUTCOME IS NOT IN FAVOUR OF CUSTOMER.....	22
	ANNEXURE D – LETTER WHERE OUTCOME IS IN FAVOUR OF CUSTOMER	23
	ANNEXURE D – LETTER WHERE OUTCOME IS IN FAVOUR OF CUSTOMER	24

1. OVERVIEW

This is the official Complaints Resolution Manual implemented for Groups Are Us (Pty) Ltd t/a Groups R Us.

2. PURPOSE

The Financial Advisory and Intermediary Services Act (FAIS Act) requires that a financial service provider must maintain an internal complaints resolution system and procedure in the event that a customer complains about a financial service rendered by the financial services provider.

Treating Customers Fairly (TCF) Outcome 6 provides 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 not only provides a complaints procedure in conformance with legislative expectations, but it also explains the procedure should you wish to complain about any of the financial services rendered by the FSP, and sets out the process which the FSP will follow in order to resolve the complaint.

3. OBJECTIVES

To deliver a **consistent, high-quality** and **accountable** response to complaints.

To ensure that our complaints procedure is in line with the overall regulatory requirements and Treating Customers Fairly outcomes and industry ‘best practises’.

4. DEFINITIONS

a) **“Complaint”**

means an expression of dissatisfaction by a complainant, relating to a product or service provided or offered by the financial services provider, or to an agreement with the financial services provider in respect of its products or services and indicating that -

- i) the financial services provider or its service provider has contravened or failed to comply with an agreement, a law, a rule, or a code of conduct which is binding on the financial services provider or to which it subscribes;
- ii) the financial services provider or its service provider’s maladministration or wilful or negligent action or failure to act, has caused the complainant harm, prejudice, distress or substantial inconvenience; or
- iii) the financial services provider or its service provider has treated the complainant unfairly. and regardless of whether such an expression of dissatisfaction is submitted together with or in relation to a customer query.

b) **“Complainant”**

means a person who has submitted a specific complaint to the financial services provider or its service provider and who –

- i) is a customer or prospective customer of the financial services provider concerned and has
- ii) a direct interest in the agreement, product or service to which the complaint relates; or
- iii) has submitted the complaint on behalf of a person mentioned in (a), provided that a prospective customer will only be regarded as a complainant to the extent that the complaint relates to the prospective customer’s dissatisfaction in relation to the application, approach, solicitation or advertising or marketing material contemplated in the definition of “prospective customer”

c) **“Customer”**

of a financial services provider means any user, former user or beneficiary of one or more of the financial products or services provided by the financial services provider, and their successors in title.

- d) **“Customer Query”**
means a request to the financial services provider by or on behalf of a customer or prospective customer, for information regarding the financial products, services or related processes, or to carry out a transaction or action in relation to any such product or service.
- e) **“FAIS”**
means the Financial Advisory and Intermediary Services Act No. 37 of 2002 which was designed to protect customers of financial services providers; regulate the selling and advice-giving activities of FSP (FSPs); ensure that the consumers are provided with adequate information about the financial product they use and about the people and institutions who sell these financial products and establish a properly regulated financial services profession.
- f) **“FAIS Ombud”**
the FAIS Ombud deals with complaints submitted to the Office by a specific customer against a financial services provider.
- g) **“NFO National Financial Ombud Scheme South Africa NPC (the NFO)”**
the primary purpose of the National Financial Ombud Scheme (NFO) is to resolve consumer complaints against financial service providers.
- h) **“Financial Services Provider”**
means Groups Are Us (Pty) Ltd t/a Groups R Us with FSP No 45735 and place of business situated at 78 Edelvalk Street, Monument Park, Pretoria, Gauteng, 0181.
- i) **“Prospective customer”**
of a financial services provider means a person who has applied to or otherwise approached the financial services provider in relation to becoming a customer of the financial services provider, or a person who has been solicited by the financial services provider to become a customer or has received marketing or advertising material in relation to the financial institution’s products or services.
- j) **“Routine Complaints”**
is where a customer submits an expression of dissatisfaction together with a customer query or relating to a customer query and which further can be resolved internally within a period of 15 days. Routine complaints are therefore customer queries which have been escalated by the customer previously but now the customer has become dissatisfied with the process being followed to resolve the customer query.
- k) **“Serious Complaints”**
are complaints that contravene regulatory requirements and are likely or may already have caused a customer to suffer financial prejudice.
- l) **“Service provider”**
means another person with whom the financial services provider to whose products or services the complaint relates has an arrangement in relation to the marketing, distribution, administration or provision of such products or services, regardless of whether or not such other person is the agent of the financial services provider.
- m) **“Resolved”**
in relation to a complaint means that the **complaint has been finalised** in such a manner that the complainant has explicitly accepted that the matter is fully resolved or that it is reasonable for the financial services provider to assume that the complainant

has so accepted. A complaint should only be regarded as resolved once any and all undertakings made by the financial services provider to resolve the complaint have been met.

n) **“TCF”**

Treating Customers Fairly is an outcomes based regulatory and supervisory approach designed to ensure that specific, clearly articulated fairness outcomes for financial services customers are delivered by regulated financial service providers (FSPs). FSPs are expected to demonstrate that they deliver the required 6 TCF Outcomes to their customers throughout the product life cycle, from product design and promotion, through advice and servicing, to complaints and claims handling – and throughout the product value chain.

5. PROCESS OVERVIEW

The following key steps must be followed for all customer complaints received by the staff of Groups Are Us t/a Groups R Us:



The requirement for each step is detailed below.

6. PROCESS

6.1 HOW TO MAKE A COMPLAINT?

- a) If you as a customer or prospective customer have a complaint against the FSP, it must be submitted to us in **writing**. It can be submitted either by hand, post, fax or email at the contact details that appear in this document.
- b) You should provide sufficient detail of the complaint including policy number details.

- c) We will keep a record of the complaint, and maintain such record for 5 years as required by legislation.

6.2 WHO WILL HANDLE YOUR COMPLAINT?

- a) Once your complaint has been received it will be allocated to and dealt with by adequately trained staff.
- b) The person responsible for your complaint will furnish you with his/her contact details and the reference number of your complaint (if applicable).
- c) Groups Are Us (Pty) Ltd t/a Groups R Us, the Compliance Officer will have oversight over the complaints allocated to various personnel and you may direct any queries to the complaints manager whose details are recorded in this document.

6.3 RECEIVE AND CLASSIFY

- a) We will ensure that all potential issues are captured and classified for escalation, review and action as required.
- b) Any complaint, issue or negative customer interaction must be reduced to writing and must be logged and classified for action.
- c) A third party acting on behalf of a complainant must deliver a certified or original consent or power of attorney to act on behalf of a complainant. Should such third party fail to deliver a consent or power of attorney, no further dealings will be pursued with such third party until the proper authority is obtained. The complaint will however be taken up directly with the complainant on whose behalf the complaint is made.
- d) All complaints must be formally logged using the following system:
All complaints to be logged on the manual complaints register. The complaints register is uploaded to the relevant insurer monthly. All complaints registers should be submitted to the compliance officer on a quarterly basis, i.e. at the end of March, June, September and December.

6.4 RISK

All complaints will be prioritised as follows:

- a) Risk 1 – routine complaints, potential low business impact. This requires a response to the customer within 15 working days.
- Routine complaints have the potential of becoming serious or official complaints should they be disregarded or ignored by a financial services provider.
 - The staff member logging the complaint should review the complaint and its priority with the Complaints Manager before proceeding to the next step.
 - The Complaints manager will decide on the appropriate person(s) to carry out subsequent steps, including the investigation
- b) Risk 2 - urgent, serious business impact. This requires a response to the customer within 5-10 working days.
- Serious complaints are complaints logged on media platforms, received from legal advisors or immediately evidence contravention of legislation requirements such as failure to conduct a proper needs analysis.
 - These complaints from the outset may cause reputational harm to a financial services provider and/or may cause financial loss to a customer.
 - These complaints should ideally be handled by the Complaints Manager/Key Individual or suitable senior person delegated to the task by the Complaints Manager/Key Individual.

- Complaints from third parties and/or legal advisors will be responded to within 24 hours, acknowledging receipt of the complaint and further requesting authority to act on the complainants behalf such as a power of attorney or consent by the complainant to deal with the complaint on the complainant's behalf.
 - No information will be divulged to a third party who does not have the proper authority to act on a complainant's behalf.
- c) Risk 3 – urgent official complaints received from regulators e.g. FAIS Ombud. The regulator usually stipulates a response time of 30 days from receipt of the complaint.
- Official complaints should be handled by the Complaints Manager/Key Individual.
 - The investigation of the complaint may be delegated to a suitable senior person selected by the Complaints Manager and the required draft response and attachments may be collated by such senior person.
 - The Complaints Manager will be ultimately responsible for compiling the response to the regulator.
 - The response to the Regulator should be made within the stipulated turn-around time.

6.5 CATEGORISATION

Note to members: The categories provided in the attached excel spreadsheet or register rolled out with this policy are not exhaustive and are merely a guideline.

- Complaints will be categorised according to whether it's nature, e.g. service, product related, features, performance, advice given etc.
- These categories are then narrowed down to its impact on customer. The impact of the complaint is measured by further categorising it according to the following TCF Outcomes:
 - **TCF Outcome 1** – Customers must feel confident that they are dealing with an institution where TCF is at the core of their culture.
 - **TCF Outcome 2** – These are complaints relating to the **design of a product or service**. The categories which affect TCF outcome 2 would be product features and charges.
 - **TCF Outcome 3** – These complaints relate to unsuitable, or inaccurate, misleading, confusing or unclear **information provided to a customer** throughout the life cycle of a product. This could vary from advice, product information, information provided in advertising or marketing material about a product or service rendered etc. These disclosures would include the conflict-of-interest disclosures required by the General Code of Conduct of FAIS (Code); Section 4 and 5 of the Code or any other disclosure requirements in terms of the Code or any other legislation.
 - **TCF Outcome 4** – These are complaints which relate to the **advice given (if advice was given)** to a customer by an advisor which was misleading, inappropriate and/or tainted with conflicts of interest which was not disclosed. Inappropriate advice given as a result of lack of knowledge, skill or experience on the part of the advisor of the product or service being rendered, would also be included here.

The failure to conduct a needs analysis and to consider the

customers financial position, goals or life stage would also amount to a contravention of suitable advice requirements and any complaint in association herewith would fall into this category.

- **TCF Outcome 5** – Complaints in this category pertain to **product performance and service-related issues**. This would include complaints relating to customer’s disappointment with limitations in a product or service performance of which they were unaware as well as the inability of a product to meet a customer’s expectations. Complaints related to a product supplier’s exercise of a right to terminate a product or amend its terms, would also be included in this category.
- **TCF Outcome 6** – These complaints relate to **product accessibility or changes, complaints** relating to complaints handling and complaints relating to claims would be categorised here.

Other categories may be developed which are appropriate to this outcome and will be incorporated into the policy and attached to the complaints register.

All complaints will be prioritised as follows:

Risk 1 – routine complaints, potential low business impact. This requires a response to the customer within 15 working days.

- Routine complaints have the potential of becoming serious or official complaints should they be disregarded or ignored by a financial services provider.
- The staff member logging the complaint should review the complaint and its priority with the Complaints Manager before proceeding to the next step.
- The Complaints manager will decide on the appropriate person(s) to carry out subsequent steps, including the investigation

Risk 2 - urgent, serious business impact. This requires a response to the customer within 5- 10 working days.

- Serious complaints are complaints logged on media platforms, received from legal advisors or immediately evidence contravention of legislation requirements such as failure to conduct a proper needs analysis.
- These complaints from the outset may cause reputational harm to a financial services provider and/or may cause financial loss to a customer.
- These complaints should ideally be handled by the Complaints Manager/Key Individual or suitable senior person delegated to the task by the Complaints Manager/Key Individual.
- Complaints from third parties and/or legal advisors will be responded to within 24 hours, acknowledging receipt of the complaint and further requesting authority to act on the complainants behalf such as a power of attorney or consent by the complainant to deal with the complaint on the complainant’s behalf.
- No information will be divulged to a third party who does not have the proper authority to act on a complainant’s behalf.

Risk 3 – urgent official complaints received from regulators e.g. FAIS Ombud. The regulator usually stipulates a response time of 30 days from receipt of the complaint.

- ☑ Official complaints should be handled by the Complaints Manager/Key Individual.
- The investigation of the complaint may be delegated to a suitable senior person selected by the Complaints Manager and the required draft response, and attachments may be collated by such senior person.

- The Complaints Manager will be ultimately responsible for compiling the response to the regulator.
- The response to the Regulator should be made within the stipulated turn-around time.

The following timelines will apply to complaints that need to be addressed and resolved:

- All complaints must be acknowledged within 24 hours.
- Risk 1 complaints require a response to the customer within 15 working days.
- Risk 2 complaints requires a response to the customer within 5-10 working days.
- Risk 3 complaints received from the Ombud requires a response to the Ombud within 30 days of receipt of the complaint.

6.6 ACKNOWLEDGE

- a) All complaints must be acknowledged within 24 hours of receipt.
- b) Where an acknowledgement is made telephonically it will be followed up with a written response whether by sms or email.
- c) A complaint reference number will be despatched to the complainant on acknowledgment of the complaint.
- d) The details of the person allocated to the complaint will be despatched to the complainant within 48 hours from receipt.

6.7 INVESTIGATE

- a) The investigation will be driven by analysing the root cause of the complaint to enable the complaint to be appropriately dealt with and to avoid, if possible, its reoccurrence.
- b) This may require that both internal and external key facts are identified and clarified.
- c) Should a complaint relate to product features or services handled solely by a product supplier, this matter will be escalated and appropriately dealt with in conjunction with the product supplier, ensuring that the matter is resolved to the satisfaction of the complainant.
- d) All areas of interaction and communication will be documented and where appropriate, consent obtained from the complainant to ensure that no personal information is divulged or processed without the complainant's knowledge or consent.
- e) During the investigation process the complainant will be kept appropriately updated of the progress of the investigation.

6.8 RESOLVE AND CONFIRM

- a) Ensure that the proposed resolution meets Treating Customers Fairly Outcomes, does not prejudice the financial services provider or complainant and does not involve any unnecessary legal or financial implications.
- b) The proposed action will be documented and discussed and agreed upon with the Complaints Manager and/or affected Key Individual and Representative.
- c) The signed off resolution will then be discussed and reviewed with the complainant to ensure fairness and clarity and to further ensure that the resolution deals with the root cause of the complaint.
- d) The review should include recognition and documentation of any underlying issues that have contributed to the complaint and recommendations for actions to prevent further occurrence.

6.9 RESPOND TO CUSTOMER

- a) The details of the findings and proposed resolution should be clearly explained (in written or verbal form as appropriate) to the customer- within the agreed timescales.
- b) Where a complaint cannot be addressed within **three weeks** by the financial

services provider, it must as soon as reasonably possible after receipt of the complaint send to the complainant a written acknowledgment of the complaint with contact references of the FAIS Ombud.

- c) If within **six weeks** of receipt of a complaint. Groups Are Us (Pty) Ltd t/a Groups R Us has been unable to resolve the complaint to the satisfaction of a complainant, the complainant may:
- refer the complaint to the Office of the FAIS Ombud if he/she wishes to pursue the matter; and
 - the complainant **MUST** do so within **six months** of receipt of such notification.

6.10 FOLLOW UP AND REVIEW

- Complaints will be diarised to ensure it remains within the appropriate turnaround times.
- Should a complaint exceed the turn-around time due to unforeseen and reasonable circumstances, the complainant will be kept appropriately informed of the reasons for the delay and a speedy resolve will continuously be sought.
- A complainant will be kept appropriately informed throughout the complaints process of the resolution being sought.
- Upon resolution of the complaint another follow-up will be conducted to ascertain whether the customer was satisfied with the complaints handling process and the resolution sought and whether the resolution was proper and fair.
- Any negative responses will be actioned in the daily review of complaints.

6.11 QUALITY ASSURANCE AND CHECKS

- The Complaints Manager will ensure that all employees of Groups Are Us (Pty) Ltd t/a Groups R Us have access to the complaint's resolution manual.
- Customers will be made aware of the complaints resolution manual and will have access to the manual upon request.
- All complaints will be reviewed monthly and would be further utilised as TCF Management Information utilised to improve overall TCF outcomes.
- All complaints will be actioned with the aim of preventing reoccurrence, where feasible.

7. REPRESENTATIVES AND SUPPLIERS

Groups Are Us Pty Ltd.'s Complaints Management Framework must have a process for managing complaints relating to representatives (juristic and natural) and service suppliers, insofar as such complaints relate to services provided in connection with Groups Are Us Pty Ltd financial products, financial services or related services.

Groups Are Us Pty Ltd will follow the process below for managing complaints relating to representatives and service suppliers:

- Ensure that Groups Are Us Pty Ltd can be reasonably satisfied that the representative or service supplier has adequate complaints management processes in place to ensure fair treatment of complainants.
- Ensure that monitoring and analysis of aggregated complaints data takes place in relation to complaints received by its representatives and service suppliers and their outcomes.
- Maintain an effective referral processes between Groups Are Us Pty Ltd and its representatives and service suppliers for handling and monitoring complaints that are submitted directly to either of them and require referral to Groups Are Us Pty Ltd for

resolution.

- Ensure that complainants are appropriately informed of the process being followed and the outcome of the complaint.

8. DECISIONS RELATING TO COMPLAINTS

Groups Are Us Pty Ltd undertakes to ensure that:

- where a complaint is upheld, any commitment by Groups Are Us Pty Ltd to make a compensation payment, goodwill payment or to take any other action will be carried out without undue delay and within any agreed timeframes.
- where a complaint is rejected, Groups Are Us Pty Ltd will provide the complainant with clear and adequate reasons for the decision and inform the complainant of any applicable escalation or review processes, including how to use them and any relevant time limits.

9. COMPLAINTS ESCALATION AND REVIEW PROCESS

Groups Are Us Pty Ltd will use the following process for the escalation and review of complaints.

The complaints escalation and review process should:

- follow a balanced approach, bearing in mind the legitimate interests of all parties involved including the fair treatment of complainants
- provide for internal escalation of complex or unusual complaints at the instance of the initial complaint handler
- provide for complainants to escalate complaints not resolved to their satisfaction
- be allocated to an impartial, senior functionary within the provider or appointed by the provider for managing the escalation or review process of the business.

The Complaints Manager is responsible for managing the escalation and review process of complaints.

Complaints may be escalated and/or reviewed in the following instances:

- Where the complaint is of a complex or unusual nature. In such an instance the initial complaint handler may escalate the complaint.
- Complainants may escalate complaints that were not resolved to their satisfaction (Complainants must be notified of this).

10. RECORD KEEPING, MONITORING AND ANALYSIS

Groups Are Us Pty Ltd. will follow the process below for: record keeping, monitoring and analysing of complaints.

The following must be recorded in respect of each reportable complaint:

- all relevant details of the complainant and the subject matter of the complaint,
- copies of all relevant evidence, correspondence, and decisions,
- the complaint categorisation,
- progress and status of the complaint, including whether such progress is within or outside any set timelines.

A provider must maintain the following data, on categorised reportable complaints, on an ongoing basis:

- number of complaints received,
- number of complaints upheld,
- number of rejected complaints and reasons for the rejection,
- number of complaints escalated by complainants to the Internal complaints escalation process,
- number of complaints referred to an ombud and their outcome,
- number and amounts of compensation payments made,
- number and amounts of goodwill payments made,
- total number of complaints outstanding.

Complaints Information that has been recorded, will be scrutinised and analysed by Groups Are Us Pty Ltd on an ongoing basis. Groups Are Us Pty Ltd will use this information to manage conduct risks and implement improved outcomes and processes for its clients, and to prevent recurrences of poor outcomes and errors.

Groups Are Us Pty Ltd maintains appropriate processes for reporting the information to its governing body or senior management.

All complaints will be recorded for five years and will be logged in the Complaints Register.

The monitoring and analysis of complaints will be reported to Groups Are Us Pty Ltd.'s senior management on a weekly basis when applicable.

The report will include:

- Information on the categorisation of complaints
- What risks have been identified since the last report
- What trends have been identified
- What actions will be taken to manage risks and implement improved outcomes.

Groups Are Us Pty Ltd will keep records of these reports, monitor changes and consider whether the Complaints Management Framework may need to be adapted in response to the findings.

Responsible person/s:

- The Complaints Manager will be responsible for the recordkeeping requirements.
- The Complaints Manager will be responsible for the monitoring requirements.
- The Complaints Manager will be responsible for the analysis requirements.

11. COMMUNICATION WITH COMPLAINANTS

Groups Are Us Pty Ltd will ensure that:

- Its complaint processes and procedures are transparent, visible and accessible through channels that are appropriate to the provider's clients.
- It does not impose any charge for a complainant to make use of complaint processes and procedures.
- All communications with a complainant will be in plain language.
- Wherever feasible, it will provide clients with a single point of contact for submitting complaints.

The following information is disclosed to a client:

- the type of Information required from a complainant
 - where, how and to whom a complaint and related information must be submitted
 - expected turnaround times in relation to complaints
 - any other relevant responsibilities of a complainant
- Within a reasonable time after receipt of a complaint, it will acknowledge receipt thereof and promptly inform a complainant of the process to be followed in handling the complaint including:
 - contact details of the person or department that will be handling the complaint
 - indicative and, where applicable, prescribed timelines for addressing the complaint
 - details of the internal complaints escalation and review process if the complainant is not satisfied with the outcome of a complaint
 - details of escalation of complaints to the office of a relevant ombud and any applicable timeline
 - details of the duties of the provider and rights of the complainant as set out in the rules applicable to the relevant ombud.
 - Complainants will be kept adequately informed of:
 - the progress of their complaint
 - causes of any delay in the finalisation of a complaint and revised timelines, and
 - the FSP's decision in response to the complaint.

12. ENGAGEMENT WITH OMBUD AND REPORTING

The FSP will follow the process below when engaging with an Ombud:

- clearly and transparently communicate the availability and contact details of the relevant ombud services to complainants at all relevant stages of the relationship with a client, including at the start of the relationship and in relevant periodic communications,
- Display and/or make available information regarding the availability and contact details of the relevant Ombud services, at the premises and/or on the company website
- Maintain specific records and carry out specific analysis of complaints referred to your business by the Ombud and the outcomes of such complaints
- Monitor determinations, publications, and guidance issued by any relevant Ombud to identify failings or risks in their policies, services, or practices
- Maintain open and honest communication and co-operation between itself and any Ombud with whom it deals; and
- Endeavour to resolve a complaint before a final determination or ruling is made by an Ombud, or through the business' internal escalation process, without impeding or unduly delaying a complainant's access to an Ombud.

13. IMPORTANT CONTACT DETAILS
Groups Are Us (Pty) Ltd t/a Groups R Us

Telephone: 086 127 3342

Email: info@grouprus.co.za / compliance@grouprus.co.za

Website: www.grouprus.co.za

FAIS Ombud

Postal Address:

FAIS Ombud

P.O. Box 74571

Lynwood Ridge

0040

Telephone: 012 762 5000 / 0860 663 247

E-mail: info@faisombud.co.za

Website: www.faisombud.co.za

National Financial Ombud Scheme South Africa

Postal Address

National Financial Ombud Scheme South Africa

110 Oxford Road,

Houghton Estate,

Illovo,

Johannesburg,

2198

Telephone: 086 800 900

E-mail: info@nfosa.co.za

Website: www.nfosa.co.za

ANNEXURE A – COMPLAINTS RESOLUTION PROCESS

Process Step	Step Details
<p>1. Lodge/Receive a Complaint</p>	<ul style="list-style-type: none"> • The client is to submit the complaint to Groups Are Us Pty Ltd in writing to the contact details that appear in the Complaints Management Framework. <ul style="list-style-type: none"> The complaint can be submitted by: <ul style="list-style-type: none"> ○ Hand ○ Post ○ Fax ○ Email <p><i>(If a complaint is submitted telephonically, Groups Are Us Pty Ltd will send the client an email to request the relevant details regarding the complaint. The client needs to respond and provide the requested information in writing (e.g. hand, post, fax or email).</i></p> • The client must submit sufficient detail of the complaint, this includes their: <ul style="list-style-type: none"> ○ Name and surname ○ Policy number ○ ID number ○ Postal address ○ Financial Advisor ○ Product Supplier ○ Product Type: Risk, Investment, Short term, Endowment, Employee Benefits, Disability, Medical Aid, Unit Trust, Wills etc. ○ Complaint Category: Product features and charges; Information Disclosures; Advice; Product performance; Client Services; Access; Changes or Switches; Complaints Handling; Claims; or Other complaints. ○ Brief detail of the complaint
<p>7. Acknowledge</p>	<p>Groups Are Us Pty Ltd will:</p> <ul style="list-style-type: none"> • Acknowledge all complaints within 24 hours of receipt. • Clearly and transparently communicate the availability and contact details of the relevant Ombud services to complainants (clients) at all relevant stages of the relationship with a client, including at the start of the relationship and in relevant periodic communications. • Ensure all communication with a complainant is in plain language. • Provide, wherever feasible, clients with a single point of contact for submitting complaints. • Promptly inform a complainant of the process to be followed in handling the complaint, including- <ul style="list-style-type: none"> ○ Contact details of the person or department that will be handling the complaint; ○ indicative and, where applicable, prescribed timelines for addressing the complaint; ○ details of the internal complaints escalation and review process if the complainant is not satisfied with the outcome of a complaint; ○ details of escalation of complaints to the office of a relevant Ombud and any applicable timeline; and ○ details of the duties of the provider and rights of the complainant as set out in the rules applicable to the relevant Ombud • Follow up telephonic acknowledgments with a written response either by SMS or email. • Despatch a complaint reference number to the complainant on the acknowledgment of the complaint. • Disclose to the client: <ul style="list-style-type: none"> ○ the type of information required from a complainant; ○ where, how, and to whom a complaint and related information must be submitted; ○ expected turnaround times concerning complaints; and ○ any other relevant responsibilities of a complainant. • Despatch the details of the person allocated to the complaint to the complainant within 48 hours from receipt.

Process Step	Step Details
<p>3. Allocate a Responsible person</p>	<p>Groups Are Us Pty Ltd will ensure that:</p> <ul style="list-style-type: none"> • The complaint is allocated and dealt with by a trained staff member. • The person responsible for the clients' complaint will furnish the client with his/her contact details and the reference number of the complaint (if applicable) • The Complaints Manager/Key Individual has oversight over the complaints allocated to various personnel
<p>4. Classify</p>	<p>Groups Are Us Pty Ltd will:</p> <ul style="list-style-type: none"> • Ensure that all potential issues are captured and classified for escalation, review, and action, as required • Reduce any complaint, issue or negative client interaction to writing then log and classify for action • Where a third party is acting on behalf of a complainant, the FSP will ensure that such third party delivers a certified or original consent or power of attorney to act on behalf of a complainant: <ul style="list-style-type: none"> ○ no further dealings will be pursued with such a third party until the proper authority is obtained, however ○ the complaint will be taken up directly with the complainant on whose behalf the complaint is made • Formally log all complaints using a relevant process / Complaints Register (whether manual or via computer database system) <p>Risk</p> <p>All complaints will be prioritised as follows:</p> <p><u>Risk 1</u> - These are routine complaints with potentially low business impact. Routine complaints:</p> <ul style="list-style-type: none"> • require a response to the client within 15 working days • have the potential of becoming serious or official complaints if disregarded or ignored by the FSP • require staff to review the complaint and its priority with the Complaints Manager/Key Individual before proceeding to the next step • requires the Complaints Manager/Key Individual to decide on the appropriate person(s) to carry out subsequent steps, including the investigation <p><u>Risk 2</u> - These complaints are urgent and can have a serious business impact. Serious complaints:</p> <ul style="list-style-type: none"> • require a response to the client within 5 - 10 working days • are logged on media platforms, received from Legal Advisors or immediately evidence contravention of legislation requirements such as failure to conduct a proper Needs Analysis • can cause reputational harm to a business and/or may cause financial loss to a client • need to be handled by the Complaints Manager/Key Individual or a suitable senior person delegated to the task by the Complaints Manager/Key Individual • Complaints received from third parties and/or Legal Advisors will be responded to within 24 hours: <ul style="list-style-type: none"> ○ acknowledge receipt of the complaint ○ further requesting authority to act on the complainant's behalf such as a power of attorney or consent by the complainant to deal with the complaint on the complainant's behalf <p>No information will be divulged to a third party who does not have the proper authority to act on a complainant's behalf.</p> <p><u>Risk 3</u> - These are urgent official complaints received from Authorities e.g. FAIS Ombud</p>

Process Step	Step Details
	<p>Urgent official complaints:</p> <ul style="list-style-type: none"> • Are handled by the Complaints Manager/Key Individual • Alternatively, the investigation of the complaint may be delegated to a suitable senior person selected by the Complaints Manager/Key Individual • The required draft response and attachments will be collated by such senior person • The Complaints Manager/Key Individual is responsible for compiling the response to the Authority • The response to the Authority will be made within the stipulated turnaround time stated on the official correspondence
<p>5. Categorisation</p>	<p>Groups Are Us Pty Ltd will categorise reportable complaints as per the following minimum categories:</p> <ul style="list-style-type: none"> • The design of a financial product, financial service, or related service, including the fees, premiums, or other charges related to that financial product or financial service; • Information provided to clients; • Advice; • Financial product or financial service performance; • Service to clients, including those relating to premium or investment contribution collection or lapsing of a financial product; • Complaints handling; • Insurance risk claims which include non-payment of claims; and • Other complaints which can be additional categories relevant to the FSPs chosen business model, financial products, financial services, and client base that will support the effectiveness of its Complaints Management Framework in managing conduct risks and effecting improved outcomes and processes for its clients <p>Group the Complaints Groups Are Us Pty Ltd will thereafter:</p> <ul style="list-style-type: none"> • Categorise, record, and report on reportable complaints by identifying the category to which a complaint closely relates and group complaints accordingly. • Narrow down the categories to the impact on clients • Measure the impact of the complaint by further categorising it according to the following TCF Outcomes <p><u>TCF Outcome 1</u> Includes complaints:</p> <ul style="list-style-type: none"> • other complaints relating to management issues <p><u>TCF Outcome 2</u> Includes complaints:</p> <ul style="list-style-type: none"> • relating to the design of a product/service • relating to product features and charges that affect this TCF outcome <p><u>TCF Outcome 3</u> Includes complaints:</p> <ul style="list-style-type: none"> • relating to unsuitable or inaccurate, misleading, confusing, or unclear information provided to a client throughout the life cycle of a product • FSP to include the Conflict of Interest disclosures required by the FAIS General Code of Conduct (Code); Section 4 and 5 of the Code or any other disclosure requirements in terms of the Code or any other legislation in these disclosures <p><u>TCF Outcome 4</u> Includes complaints:</p> <ul style="list-style-type: none"> • relating to the advice given to a client by an Advisor which was misleading, inappropriate, and/or tainted with conflicts of interest which were not disclosed

Process Step	Step Details
	<ul style="list-style-type: none"> • concerning inappropriate advice given as a result of lack of knowledge, skill, or experience on the part of the Advisor of the product/service being rendered • regarding failure to conduct a Needs Analysis and to consider the clients' financial position, goals, or life stage <p><u>TCF Outcome 5</u> Includes complaints:</p> <ul style="list-style-type: none"> • about product performance and service-related issues • relating to a client's disappointment with limitations in a product/service performance of which they were unaware • relating to the inability of a product to meet a client's expectations • related to a Product Supplier's exercise of a right to terminate a product or amend its terms <p><u>TCF Outcome 6</u> Includes complaints:</p> <ul style="list-style-type: none"> • relating to product accessibility, changes or switches • relating to handling and complaints relating to claims
<p>6. Investigate</p>	<p>Groups Are Us Pty Ltd will:</p> <ul style="list-style-type: none"> • Analyse the root cause of the complaint to enable the complaint to be appropriately dealt with and avoid, if possible, its re-occurrence • Identify and clarify internal and external key facts. • Escalate complaints relating to product features or services handled solely by a Product Supplier. • Whenever a complaint is escalated or reviewed ensure that: <ul style="list-style-type: none"> ○ A balanced approach is followed, bearing in mind the legitimate interests of all parties involved including the fair treatment of clients ○ Internal escalation of complex or unusual complaints at the instance of the initial complaint handler is provided for; ○ Clients may escalate complaints not resolved to their satisfaction ○ the escalation is allocated to an impartial, senior functionary within the provider or appointed by the provider for managing the escalation or review process of the provider. • Ensure that procedures within the complaints escalation and review process are not overly complicated or impose unduly burdensome paperwork or other administrative requirements on complainants (clients) • Document all areas of interaction and communication. • Ensure accurate, efficient, and secure recording of complaints and complaints-related information • In respect of each reportable complaint, keep a record of: <ul style="list-style-type: none"> ○ All relevant details of the complainant and the subject matter of the complaint ○ Copies of all relevant evidence, correspondence, and decisions ○ The complaint categorisation ○ The progress and status of the complaint, including whether such progress is within or outside any set timelines • Concerning reportable complaints categorised on an ongoing basis record the number of complaints: <ul style="list-style-type: none"> ○ Received, ○ Upheld, ○ Rejected and their reasoning, ○ Escalated by complainants (clients) to the internal complaints escalation process, ○ Referred to an Ombud and their outcomes; ○ and amounts of Compensation payments made, ○ and amounts of goodwill payments made, ○ the total number of complaints outstanding. • Ensure complaints information recorded is scrutinised and analysed on an ongoing basis and utilised to manage conduct risks and effect improved outcomes and processes for clients, and to prevent recurrences of poor outcomes and errors

Process Step	Step Details
	<ul style="list-style-type: none"> Obtain consent from the complainant to ensure that no personal information is divulged or processed without the complainant's knowledge or consent. Keep the complainant appropriately updated on the progress of the investigation.
7. Resolve and confirm	<p>Groups Are Us Pty Ltd will:</p> <ul style="list-style-type: none"> Ensure that the proposed resolution meets the Treating Customers Fairly Outcomes, does not prejudice the FSP or complainant, and does not involve any unnecessary legal or financial implications. Document and assess the proposed action agreed upon with the Complaints Manager and/or affected Key Individual and Representative. Discuss and review the signed off resolution with the complainant to ensure fairness and clarity and to further ensure that the resolution deals with the root cause of the complaint. Include recognition and documentation of any underlying issues that have contributed to the complaint and recommendations for actions to prevent the further occurrence in the review.
7. Respond to Client	<p>Groups Are Us Pty Ltd will:</p> <ul style="list-style-type: none"> Ensure the complaint process is accessible through channels that are appropriate to the FSP's clients Ensure there are no charges for making use of the complaint process Ensure communication is in plain language Clearly explain the details of the findings and proposed resolution to the client - within the agreed timeframes. Where a complaint is upheld, if there has been any commitment by the FSP to make a compensation payment, goodwill payment, or to take any other action ensure it is carried out without undue delay and within the agreed timeframes Where a complaint is rejected, the complainant must be provided with clear and adequate reasons for the decision and must be informed of any applicable escalation or review processes, including how to use them and any relevant time limits. Send a written acknowledgment of the complaint to the complainant, with contact details of the FAIS Ombud, if the complaint cannot be addressed within three weeks and a single point of contact for submitting complaints. <p>If within six weeks of receipt of a complaint the FSP has been unable to resolve the complaint to the satisfaction of a complainant, the complainant may:</p> <ul style="list-style-type: none"> refer the complaint to the Office of the FAIS Ombud if he/she wishes to pursue the matter; and the complainant must do so within six months of receipt of such notification. Appropriate processes for engagement with the Ombud
9. Follow up and review	<p>Groups Are Us Pty Ltd will:</p> <ul style="list-style-type: none"> Diarise complaints to ensure it remains within the appropriate turnaround times. Keep complainant appropriately informed of the progress of their complaint, Keep complainant appropriately informed of causes of any delay in the finalisation of a complaint and revised timelines, should a complaint exceed the turnaround time due to unforeseen and reasonable circumstances. Keep complainant appropriately informed throughout the complaints process of the resolution being sought. Conduct a follow-up on the resolution of the complaint, to ascertain whether the client was satisfied with the complaints-handling process and the resolution sought and whether the resolution was proper and fair. Action any negative responses in the review of complaints.
10. Quality Assurance and Close	<p>Groups Are Us Pty Ltd will:</p> <ul style="list-style-type: none"> Ensure the Board of Directors/Governing Body/Complaints Manager/Key Individual ensures that all employees of the business have access to the Complaints Management Framework. Ensure the Board of Directors/Governing Body/Complaints Manager/Key Individual approves and oversees the effectiveness of the implementation of the Complaints Management Framework.

Step	Step Details
	<ul style="list-style-type: none"> • Ensure the responsible person, making a decision or recommendation is adequately trained, has an appropriate mix of experience, knowledge, and skills in complaints handling, fair treatment of customers, subject matter concerned, relevant legal and regulatory matters also not subject to conflict of interest and be adequately empowered to make impartial decisions or recommendations. • Ensure clients will be made aware of the Complaints Management Framework and will have access to the manual upon request. • All complaints will be reviewed weekly and will be used as TCF Management Information to improve overall TCF outcomes. • Action all complaints to prevent re-occurrence of poor outcomes and errors, where feasible. • Ensure complaints are scrutinised and analysed on an ongoing basis • Ensure complaints are utilised to manage conduct risks • Ensure complaints effect improved outcomes and processes for its clients • Update the Complaints Register. • Ensure compliance with any prescribed requirements for reporting complaints information to any relevant designated authority or the public as may be required by the Registrar. • Close the matter.

ANNEXURE B – ACKNOWLEDGEMENT LETTER

Explanatory note:

The General Code of Conduct requires that an FSP must promptly acknowledge receipt of a complaint in writing with particulars of the staff involved in the resolution of the complaint.

This template letter should be pasted onto a letterhead with full details of the FSP. Keep a record or proof that the letter has been sent. The style and format may be changed according to the FSP's own style and individual requirements.

Dear Mr / Mrs *[Name of Customer]*

We acknowledge receipt of your written complaint, received by us on *[date]*.

We will investigate the matter and attempt to resolve the complaint within a period of *[timeframe]*. If we are unable to resolve the complaint within this time, we will notify you of the reasons for the delay.

The staff member who will be dealing with your complaint is *[staff member's name]*. *[He/She]* may be contacted at the details that appear above.

While we regret that you have cause for concern regarding our financial services rendered, be assured that we will investigate and attempt to resolve your complaint in a timely and fair manner.

Thank you for bringing this to our attention, and for your patience while we investigate this matter.

A copy of our Complaints Resolution Manual is available from our offices, upon request.

Yours faithfully

[FSP]

ANNEXURE C – LETTER WHERE OUTCOME IS NOT IN FAVOUR OF CUSTOMER

Explanatory note:

The General Code of Conduct requires that where the complaint cannot be resolved in favour of the customer, the customer must be informed in writing of the full reasons for not resolving the complaint. The customer must be informed that he/she may refer the matter to the FAIS Ombud within 6 months of this notification. This template letter may be used for this purpose and should be pasted onto a letterhead with the date. Insert full details of the reasons why the complaint could not be settled as this letter will be considered by the Ombud if the matter is referred to him.

Dear Mr / Mrs *[Name of Customer]*

We refer to your written complaint that was received by us on *[date]*.

Thank you for your patience whilst we conducted a thorough investigation into the matter.

We unfortunately regret to advise that we were unable to resolve the complaint in your favour. Our decision is based on the following reason(s):

- 1.
- 2.
- 3.

Should you wish to pursue the matter further with us, the details of our internal complaints escalation and review process is as follows *[include the relevant timeframes and staff member to contact]*:

.....
.....

Alternatively, should you wish to pursue the matter further; you may refer the complaint to the FAIS Ombud. This should be done within six months of receipt of this letter.

The office of the FAIS Ombud may be contacted at:

Postal Address	FAIS Ombud P.O. Box 74571 Lynwood Ridge 0040
Telephone	012 762 5000 / 0860 663 247
E-mail	info@faisombud.co.za
Website	www.faisombud.co.za

Further steps available to you include seeking legal advice from an Attorney or you may refer the matter to arbitration.

Yours faithfully

[FSP]

ANNEXURE D – LETTER WHERE OUTCOME IS IN FAVOUR OF CUSTOMER

Explanatory note:

The General Code of Conduct requires that where the complaint is resolved in favour of the customer, the FSP must ensure that a full and appropriate redress is offered to the customer without any further delay.

This template letter may be used for this purpose and should be pasted onto a letterhead with the date. Insert full details of the settlement offer including the amount payable, whether any costs will be covered and the manner in which the amount will be settled.

It is suggested that if the offer is acceptable to the customer, he or she acknowledges in writing that the complaint has been resolved to his or her satisfaction.

Dear Mr / Mrs ***[Name of Customer]***

We refer to your written complaint which was received by us on [date].

Thank you for your patience whilst we conducted a thorough investigation into the matter.

It gives us pleasure to advise that the complaint has been resolved in your favour. The decision is based on the following reasons:

- 1.**
- 2.**
- 3.**

We would like to offer you the following redress:

- 1.**
- 2.**
- 3.**

Kindly advise whether this is acceptable to you, so that we can confirm our agreement in writing. Once again, our sincere apologies for the cause which led to this complaint. We hope that we can still be of service to you in the future.

Yours faithfully

[FSP]

ANNEXURE D – LETTER WHERE OUTCOME IS IN FAVOUR OF CUSTOMER

Doc version and change tracking:

- Must be completed by last author/reviewer of document.

Seq No:	Date of review	Version Reviewed	New Version	Short note of critical changes	Author/Reviewer Name
1	2021	Non existent	V 1.0	Base Policy to Ensure operational ability.	Andre van Tonder
2	2022	V 1.0	V 2.0	Optimisation of Version 1.0	Andre van Tonder
3	2023	V 2.0	V 3.0	Optimisation of Version 2.0 (Added version and Index Standards)	Andre van Tonder
4	2024	V 3.0	V 4.0	Optimisation of Version 3.0	Caitlin Kramer
5	2024	V4.0	V5.0	LTInsurance Ombud to NFO Update	Andre van Tonder
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