



Asuer (Pty) Ltd
208 Boundary Park, Corner of Epsom Avenue & Malibongwe Drive, Northriding, Johannesburg, 2162
010 823 7237
info@asuer.co.za
www.asuer.co.za

POLICY

Complaint Management Policy and Framework

1. Scope

The board of directors and Key Individuals of Asuer are responsible for effective complaints management and must approve and oversee the effectiveness of the implementation of the complaint management framework.

- 1.1** "complaint" in terms of this policy means an expression of dissatisfaction by a person to an employee, a Key Individual or Representative, the Complaints Officer or, to the knowledge of Asuer, to a service supplier relating to a financial product or financial service provided or offered by Asuer which indicates or alleges, regardless of whether such an expression of dissatisfaction is submitted together with or in relation to a client query, that:
- 1.1.1** Asuer, its representative or a product / service provider used or recommended by Asuer has contravened or failed to comply with an agreement, a law, a rule, or a code of conduct which is binding on the provider or to which it subscribes;
 - 1.1.2** Asuer, its representative or a product / service provider used or recommended by Asuer's maladministration or wilful or negligent action or failure to act, has caused the person harm, prejudice, distress, or substantial inconvenience; or
 - 1.1.3** Asuer, its representative or a product / service provider used or recommended by Asuer has treated the person unfairly; and excludes any complaint:
 - 1.1.4** upheld immediately by the person who initially received the complaint;
 - 1.1.5** upheld within Asuer's ordinary processes for handling client queries in relation to the type of financial product or financial service complained about, provided that such process does not take more than five business days from the date the complaint is received; or
 - 1.1.6** submitted to or brought to the attention of Asuer in such a manner that it does not have a reasonable opportunity to record such details of the complaint as may be prescribed or required to investigate the complaint.
- 1.2** "complainant" in terms of this policy means a person who submits a complaint and includes a:
- 1.2.1** Customer;
 - 1.2.2** person nominated as the person in respect of whom a product supplier should meet financial product benefits or that person's successor in title;
 - 1.2.3** person whose life is insured under a financial product that is an insurance policy;

- 1.2.4 person that pays a premium or an investment amount in respect of a financial product;
- 1.2.5 member of a pension fund, provident fund, friendly society, medical scheme, or group scheme; or
- 1.2.6 person whose dissatisfaction relates to the approach, solicitation, marketing or advertising material or an advertisement in respect of a financial product, financial service, or related service of the provider,

who has a direct interest in the agreement, financial product, or financial service to which the complaint relates, or a person acting on behalf of a person referred to in (a) to (f).

1.3 "upheld" means that a complaint has been finalised wholly or partially in favour of the complainant and that:

- 1.3.1 the complainant has explicitly accepted that the matter is fully resolved; or
- 1.3.2 it is reasonable for the provider to assume that the complainant has so accepted; and
- 1.3.3 all undertakings made by the provider to resolve the complaint have been met or the complainant has explicitly indicated its satisfaction with any arrangements to ensure such undertakings will be met by the provider within a time acceptable to the complainant.

2. Purpose

The objective of this complaint management framework is to bring about:

- 2.1 fair outcomes for complainants;
- 2.2 the fast, effective, and objective resolution of any complaint;
- 2.3 proper and regular feedback to complainants;
- 2.4 improved organisational effectiveness through learning from client feedback and root cause analysis;
- 2.5 effective engagement between Asuer and the relevant Ombudsman scheme;
- 2.6 identification of possible service breakdowns and product or third-party challenges; and
- 2.7 compliance with reporting requirements to the Registrar and / or the public where relevant.

3. Policy statement

Asuer is dedicated to ensuring that all complaints received are resolved promptly and in a fair and equitable manner. We also consider client complaints and feedback vitally important enabling us to continuously improve our value proposition available to Customers.

3.1 Key principles

The following principles and standards shall apply to the complaint management process:

- 3.1.1 **Accessibility:** The complaints process is simple and easily accessible;
- 3.1.2 **Client-centricity:** Clients will be treated with respect, and receive regular and clear, plain-language feedback;

- 3.1.3 Quality investigation:** Circumstances relating to a complaint will be investigated thoroughly;
- 3.1.4 Timely resolution:** Complaints must be resolved well within the timelines set out in this framework;
- 3.1.5 Impartial review:** The person responsible for complaints management's duties, reporting lines and performance agreement will ensure that they act impartially and objectively;
- 3.1.6 Meaningful management information and analysis:** Informative reports on complaints will be developed, aligned to regulatory requirements and business needs, and provided regularly to senior management.

4. Complaints framework

4.1 Complaints Officer

To enhance the accountability of the complaints management function we have appointed Paul Ontong as our Complaints Officer.

The following responsibilities have been assigned to our Complaints Officer:

- 4.1.1** monitoring social media platforms for complaints;
- 4.1.2** recording and analysing complaints;
- 4.1.3** monitoring resolution process deadlines and ensuring that these are complied with;
- 4.1.4** recording all client communication that forms part of the resolution process;
- 4.1.5** identify trends and provide regular feedback to senior management (at least at each board / executive committee meeting);
- 4.1.6** thoroughly investigating complaints;
- 4.1.7** regularly liaising with complainants;
- 4.1.8** recommending (for each complaint) a suitable resolution to the management of Asuer;
- 4.1.9** providing general and ad hoc management information in respect of complaints received;
- 4.1.10** liaising with the relevant Ombud scheme; and
- 4.1.11** monitoring determinations, publications and guidance issued by any relevant Ombud with a view to identifying failings or risks in our own policies, services, or practices.

4.2 Lodging a complaint

Our complaints process is transparent, accessible, and readily available in the form of a brief step by step complaint process available on our company website.

The published complaint process includes:

- 4.2.1** the type of information required from a complainant;
- 4.2.2** where, how and to whom a complaint and related information must be submitted;
- 4.2.3** expected turnaround times in relation to complaints; and
- 4.2.4** any other relevant responsibilities of a complainant.

Complaints should preferably be lodged via email to complaints@asuer.co.za.

Anyone who receives a complaint or becomes aware of a complaint should bring it to the attention of the Complaints Officer immediately and provide the Complaints Officer with as much information relating to the complaint as possible. On receipt of a complaint the Complaints Officer will:

- 4.2.5** acknowledge receipt to the complainant straight away (time period extended in certain circumstances to at most 5 days) and advise the client of further steps that Asuer will take and expected date of resolution;
- 4.2.6** capture and classify the complaint in the complaint register and keep the register up to date with all developments and activities (register provided in Annexure A);
- 4.2.7** investigate the complaint further;
- 4.2.8** resolve the complaint immediately if possible;
- 4.2.9** make recommendations for resolution and obtain approval for a compensation or goodwill payment if relevant;
- 4.2.10** revert with findings within 3 weeks from receipt of the complaint; and
- 4.2.11** if the investigation and recommendation processes have not been finalised, advise the client and provide an expected date of resolution (by latest 3 weeks after receipt of the complaint).

If the Complaints Officer finds a complaint to be unusually complex it will be escalated to a key individual.

4.3 Complaint outcomes

The complaint may either be "rejected" meaning that it has not been upheld and Asuer regards the complaint as finalised after advising the complainant that it does not intend to take any further action to resolve the complaint or "upheld" meaning that it has been finalised wholly or partially in favour of the complainant and that:

- 4.3.1** the complainant has explicitly accepted that the matter is fully resolved; or
- 4.3.2** it is reasonable for the provider to assume that the complainant has so accepted; and
- 4.3.3** all undertakings made by Asuer to resolve the complaint have been met or the complainant has explicitly indicated its satisfaction with any arrangements to ensure such undertakings will be met within a time acceptable to the complainant.

When a complaint is rejected the complainant will be informed and be provided with clear and adequate reasons for the decision, and be provided with the escalation process available, how to use such processes and the relevant time limits.

4.4 Escalation process

Where a complaint could not be resolved to the complainant's satisfaction by the Complaints Officer the complainant will be advised that they may refer the matter to the/a Key Individual.

After the complaint has been escalated and the client is still not satisfied with the outcome, Asuer will regard the complaint as being unsatisfactorily resolved. The client must be advised that he/she may under such circumstances approach the office of the Ombud for Financial Services Providers or take such other steps as may be advised by their legal representatives.

4.5 Unresolved complaints

In instances where Asuer has not been able to arrive at a resolution within six weeks after having received the complaint, the client must be advised that he/she may refer the matter to the Ombud, be provided with the Ombud's contact details and advised that this must be done within a period of six months.

The Ombud for Financial Services Providers may be contacted as follows:

Telephone: +27 12 762 5000 / +27 12 470 9080

Facsimile: +27 86 764 1422 / +27 12 348 3447

Email: info@faisombud.co.za

Website: www.faisombud.co.za

4.6 Complaints about related / associated entities

We request and review the complaints processes of our product providers and distribution partners as part of our due diligence process.

The complaints process referred to must:

- 4.6.1** be proportionate to the nature, scale and complexity of their business and risks;
- 4.6.2** be clear on the responsibilities in relation to the handling and reporting of complaints;
- 4.6.3** be appropriate for their business model, policies, services, policyholders, and beneficiaries;
- 4.6.4** act as an enabler of a process where complaints are considered and investigated thoroughly and resolved with due regard to the fair treatment of complainants;
- 4.6.5** not impose unreasonable barriers to complainants; and
- 4.6.6** be fully compliant with the Financial Advisory and Intermediary Services Act (FAIS) as well as the Policy Holder Protection Rules (PPRs).

Where any complaint received pertains to something out of our control, e.g., product information, product performance, or advice provided by a third-party provider, Asuer will forward the complaint to the party concerned, advise the client accordingly, and, where possible, facilitate the resolution process.

4.7 Record keeping and complaint register

Asuer will keep record of the complaint (see complaint register provided in Annexure A). This record as well as all related correspondence, evidence, documentation, evidence of losses sustained, and investigations and decisions will be kept for a minimum period of 5 years.

The complaint register will provide valuable information, as root cause analysis of complaints common to certain categories will enable us to identify failings in control systems, poor staff or service provider performance, skills gaps, or misconduct. The outcome will in turn initiate effective and targeted corrective action.

5. Consequences of non-adherence

Disciplinary action will be taken against staff members who do not comply with this policy and related procedures.

6. Training and awareness

Staff members will receive a copy of this policy on employment and will receive training on this policy if complaints management and handling falls in their scope of duties.

A complaint manual has been developed to further guide staff with regards to complaint handling.

7. Review

This policy will be reviewed regularly.

8. Annexures

Annexure A: Complaint register

The complaint register is a wide multi-column form used to log every complaint. Each entry records the following columns:

A.1 No.

A.2 Date received

A.3 Complainant

A.4 Representative

A.5 Complaint summary

A.6 Complaint category

A.7 Resolution process

A.8 Referred to Ombud?

A.9 Redress (Apology or Amount)

Complaint summary (e.g.):

- Product or service related?
- Account / policy number if relevant
- Short summary
- Evidence collected and saved where?

Complaint category (keep appropriate):

- Outcome 2: Product or service design (e.g., inadequate or too expensive)
- Outcome 3: Information provided (e.g., misleading advertising)
- Outcome 4: Advice
- Outcome 5(a): Product or service performance (incl. 3rd party providers)
- Outcome 5(b): Customer service, incl. complaints in respect of premiums, investment contributions and lapsing of a product
- Outcome 6(a): Product accessibility, changes or switches (incl. penalties on cancellation, challenges with renewals etc.)
- Outcome 6(b): Complaints handling
- Outcome 6(c): Insurance claims incl. non-payment

- Other complaints

Resolution process (timing markers):

- 5 days: Communication
- 3 weeks: Communication
- 6 weeks: Communication

Resolution process (status checks, in sequence):

- Acknowledged?
- Ongoing? Escalated? Process provided? Finalised? Reply sent within deadline?
- Finalised? Ongoing? If ongoing: Ombud process provided? Reply sent within deadline?