

## **Complaints Policy**

### **Chilliblu Consulting (Pty) Ltd is committed to:**

- Resolving client complaints free of charge in a manner, which we believe, is fair to our clients, our business and our staff.
- Ensuring that clients have full knowledge of the procedures established for internal resolution of their complaints, details of which will be given to them in writing.
- Ensuring easy access to our complaints resolutions facilities at our office, or by way of mail, telephone, fax or electronic support.
- Employing and empowering properly trained personnel in our business to deal with complaints, as well as more senior people to handle complaints of a more serious nature.
- Dealing with complaints in a timely and fair manner, with each complaint receiving proper consideration in a process that is managed appropriately and effectively.
- Offering full appropriate redress in all cases where a complaint resolved in favour of a client – without delay.
- Informing clients of their right to refer their complaint to the FAIS Ombud, should a complaint not be resolved
- to their satisfaction within four weeks from the date on which the complaint is received.
- Maintaining records of all complaints received for a period of 5 years, which will specify whether or not complaints were resolved.
- Implementing follow-up procedures to:
  - Ensure the avoidance of occurrences giving rise to complaints and
  - Improve services and complaint systems and procedures where necessary.

### **Complaints Procedure**

Complaints will be dealt with in the following manner:

- Logging of the date and contents of the complaint in the Complaints Register.
- If a complaint is not in writing, ask the client to lodge the complaint in writing. If this is absolutely impossible, a senior personnel member appointed for this purpose, may take the complaint down in writing on behalf of the complainant.

- Acknowledge receipt of the complaint in writing within 5 days of receipt, and give the client the name(s) and contact details of the staff member responsible for the resolution of the complaint.
- Investigate the complaint to ascertain whether the complaint can be resolved immediately.
- If the complaint can be resolved immediately, take the necessary action and advise the client accordingly.
- If the complaint cannot be resolved immediately, send the client a written summary of the steps taken to resolve the matter and the expected date of resolution.
- If unable to resolve the complaint within six weeks of logging the complaint in the Complaints Register, notify the client accordingly and advise the client of his/her right to:
  - Proceed in terms of Rule 6(a) of the Rules on Proceedings of the Office of the Ombud for Financial Service Providers
  - or
  - Seek Legal redress in another form.

## **Complaints Management Framework**

### **Introduction:**

Section 17 of the General Code of Conduct as set out in the FAIS Act 37 of 2002 (as amended) set out the requirements of the Complaints Processes and Procedures which a FSP must follow. This section also requires the establishment of a Complaints Management Framework.

### **Purpose:**

The purpose of this framework is to:

- set out the Complaints Management Framework with the objective of ensuring fair treatment of the customer.
- provide criteria that must be adhered to across the company in respect of the management of customer complaints.
- promote awareness of the importance of adherence to the Framework by all employees, which will enhance fair treatment of customers.
- enable complaints to be considered fairly after taking reasonable steps to gather and investigate all relevant and appropriate information and circumstances
- to prevent unreasonable barriers to complain

### **Objectives:**

The Complaints Management Framework formalises the practices required for effective management and handling of customer complaints within the FSP. The objective is to ensure effective standards of

- complaints management in order to:
- ensure fair outcomes for customers protect and enhance the FSP's reputation.

- allow for effective reporting, detailed analysis and identification of trends related to complaints.
- achieve effective and timely resolution of complaints in respect of acceptable turn-around times.
- provide guidelines for acknowledging complaints (and complainant communication) and for recording customer complaints in a centralised manner.
- improve organisational effectiveness through learning from customer feedback and root cause analysis.
- ensure effective management of complaints, in line with this Framework.
- ensure effective engagement between the FSP and the relevant Ombudsman scheme.
- ensure requirements are met for reporting to the Registrar and / or the public (if required)
- restore and enhance relationships with complainants and non-complainants for the purpose of on-going business retention and growth.
- ensure objectivity by the complaints handling staff in attending to and resolving.

**This Framework:**

- provides general principles to guide the way complaints are managed within the FSP.
- sets out the FSP's philosophy concerning the way complaints are handled, resolved and maximized (maximized refers to conducting analysis of complaints for root cause analysis to ensure processes are improved to reduce complaints where necessary).
- will be reviewed on an ongoing basis.

**Commitment:**

**Prompt attention:**

We undertake to handle any complaint with the necessary efficiency to be able to give a prompt outcome of the complaint to the customer. This will help us to improve our standards. We are committed to providing a high-quality service to all our customers.

**Fairness:**

We undertake to investigate every complaint with the necessary seriousness and fairness will be of prime importance. Furthermore, we undertake that a full and appropriate level of redress is offered to the customer, without delay, where the complaint is resolved in favour of the customer.

**Transparency:**

We undertake to handle every complaint with transparency and that the investigation process and procedure will be available for inspection by the customer at any given time.

**Roles and Responsibilities:**

SECTION	DESCRIPTION	RESPONSIBLE PERSON	RECOMMENDATIONS / COMMENTS
Roles/Responsibilities			
	Responsibility to ensure the effective complaints management and approval and oversee of the implementation of the Complaints Management Framework.	The Board of Directors	

	Responsibility for establishing and managing an effective, professional complaints-handling system in line with regulatory requirements.	Key Individuals	
	Effective training of staff i.e. complaints handling	Key Individuals	
	Responsibility for making decisions in respect of general complaints.	Representatives / Staff	For example: Follow-up on process of claim
	Responsibility for making decisions in respect of general or specific complaints.	Key Individuals	These decisions refers to complaints where an investigation is necessary

## TCF Categorisation of complaints

SECTION	DESCRIPTION	RESPONSIBLE PERSON	RECOMMENDATIOIS / COMMENTS
TCF Categorisation of complaints		Staff / Key Individuals / Board of Directors	
Complaints relating to the design of retirement fund products or services	<p>** complaints indicating that specific features of the products, processes or services are unfair, inadequate, confusing or overly complex, or unsuitable for customers ** complaints regarding the features and operations of the FSP</p> <p>** complaints regarding unfair or confusing pricing, costs or charges.</p>		TCF Outcome 2
Complaints relating to information provided to customers or potential customers	<p>This will include complaints regarding any documentation and information that was provided to customers or prospective customers, or other communications with customers or prospective customers that are inaccurate, unsuitable, misleading, incomplete, confusing, unclear, etc.</p> <p>The following is be covered under this category.</p> <p>** advertising and marketing material</p> <p>** content of the information provided</p> <p>** manner or medium in which it is provided</p> <p>** failure to provide adequate information</p> <p>** complaints that information was provided at an inappropriate time.</p>		TCF Outcome 3
Complaints relating to advice	<p>This category includes the following complaints:</p> <p>** customers were not informed about the cost of advice and impact thereof</p> <p>** where the representatives provided customers with advice, for example regarding insurance cover or a customer is of the opinion that such advice -</p> <p>*** did not take adequate account of the customer needs or circumstances at the time</p> <p>*** was factually incorrect or misleading;</p> <p>or *** the advice was</p>		TCF Outcome 4

	<p>not provided timeously.          *** the representative did not provide sufficient information regarding similar products available to the customer          ** complaints relating to the FSP's remuneration.</p>		
Complaints relating to a product offered by an Insurer	<p>This will include complaints relating to a customer's concern or unhappiness in respect of          ** the Insurers products that are not in line with their reasonable expectations.</p>		TCF Outcome 5(a)

	<p>** failure to fulfil delegated duties and responsibilities          ** the customers not being kept adequately informed about the underlying changes of the policy conditions</p> <p>Complaints relating to non-payment of insurance risk claims should not however be placed in this category but in TCF Outcome 6</p>		
Complaints relating to service rendered by the FSP or Insurer	<p>Customer service complaints are those expressing dissatisfaction with services rendered by the FSP or Insurer. This include complaints regarding- ** perceived poor administration service          ** failure to maintain proper records          ** breaches of privacy or confidentiality          ** customer service standards provided by a third party or outsourced service</p> <p>Service complaints relating to the complaints handling of the administration of insurance risk claims, should not be included in this category but in TCF Outcome 6.</p>		TCF Outcome 5(b)
Complaints relating to cover changes or switches or hurdles in respect of transfers of policies	<p>Where the FSP is responsible for managing the changes to customer's policies there should be no barriers or limitations for the customer transferring / changing to another policy or on the ability to make changes to the product or service.</p> <p>Such requests must also be done timeously to avoid any prejudice to customers.</p>		TCF Outcome 6(a)
Complaints relating to complaints handling	<p>This includes complaints regarding the process of handling customer complaints, enquiries and transactions and how customers are treated or dealt with (e.g. complaints of rudeness, incompetence or non-responsiveness).</p> <p>This category will include complaints regarding the administration of the complaints process, such as delays, poor communication regarding processes and decisions, cumbersome or inaccessible processes, failure to inform complainants of their</p>		TCF Outcome 6(b)

	rights regarding escalation of complaints or OSTI and FAIS Ombud processes, etc.		
Complaints relating to claims and non-payment of claims	<p>This category should be used for complaints regarding insurance claims and the nonpayment or repudiation of claims.</p> <p>These complaints would include-  ** complaints relating to the administration of the claim process (such as delays, poor communication regarding processes and decisions, cumbersome or inaccessible processes, etc.)  ** complaints relating to actual non-payment of claims. In the case of non-payment of claims, reporting requirements in relation to this category are likely to</p>		TCF Outcome 6(c)

## Types of Complaints

SECTION	DESCRIPTION	RESPONSIBLE PERSON	RECOMMENDATIONS / COMMENTS
Types of Complaints			
Telephonic complaints	Customer contact FSP per telephone. Resolution can be achieved during conversation.	Representative	Example: Customer request progress report of a previous request
	Customer contact FSP per telephone. Resolution cannot be achieved during conversation and must be escalated and investigated.	Supervisor or Key Individual	Example: Customer is not satisfied on the outcome of a claim
E-mail complaints	Customer contact FSP via e-mail. Resolution can be achieved immediately.	Representative	Example: Customer request progress report of a previous request
	Customer contact FSP per telephone. Resolution cannot be achieved during conversation and must be escalated and investigated.	Supervisor or Key Individual	Example: Customer is not satisfied on the outcome of a claim
Social media complaints	Customer posted complaint on platforms such as Hello Peter, Facebook, Instagram etc	Supervisor or Key Individual	
Insurer Complaints Department	Complaints received from Insurers	Key Individual	
Ombudsman Complaints	Complaints received from OSTI, FAIS Ombud etc	Key Individual	

## Complaints Procedure

SECTION	DESCRIPTION	RESPONSIBLE PERSON	RECOMMENDATIONS / COMMENTS
Complaints Procedure		Staff / Key Individuals / Board of Directors	
	All complaints must be in writing and where applicable with the relevant documentation attached thereto.		
	Complaints may be submitted by hand, by post, via fax or via e-mail.		
	Complaints that are not immediately put in writing will still be handled provided that the expectation remains that the complaint must be submitted in writing.		
	All complaints will be handled by the appointed Customer Service Manager, the Key Individual or Director.		
	Acknowledgement of the complaint will be sent within 24 hours.		
	The responsible person will contact the client telephonically or via email to inform the client who will be dealing with the complaint on behalf of the company.		
	The complaint will be investigated by the person responsible and further information may be requested from the client to clarify certain issues where required.		
	As stipulated by legislation, all complaints must be resolved within 6 weeks of receipt thereof		
	If the complaint cannot be resolved, the client will be invited to a meeting to discuss the complaint with the aim to resolve such complaint.		
	The client will be notified in writing of the decision with the reasons therefore.		
	If the client is not satisfied with the outcome of the investigation, the client has the right to escalate the matter to the Insurer to review the complaint and decisions made.		
	In the event that the client is still not satisfied with the Insurer's decision the client may also at any time lodge a complaint with the Ombudsman for ShortTerm Insurance at PO Box32334;Braamfontein; 2017; fax number 0117265501 tel number 0860 726890 email info@osti.co.za		
	The client may also refer the matter to the FAIS Ombud within 6 months of the outcome of the investigation. The FAIS Ombud can be contacted at: PO Box 74571 Lynnwood Ridge 0040 Tel: (012) 470-9080 Fax: (012) 348-3447		
	The complaint will be noted on the complaints register for future reference.		
	The complaint will be kept on the register for a period of 5 years.		