

Complaints Management Policy and Framework.

Dis-Chem+
Life.

Dis-Chem Life (Pty) Ltd is an authorised Financial Services Provider(FSP 50594).
Products underwritten by Guardrisk Life Limited, a Licensed Life Insurer in terms of the
Insurance Act (FSP 76).

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1. Introduction and Objective

Dis-Chem Life (Pty) Ltd (hereinafter referred to as “Dis-Chem Life”) is committed to a high service standard, rendering financial services with integrity, the speedy resolution of complaints and the overall improvement of processes even in the instance where a complaint may be viewed as ‘invalid’ in terms of the relevant policy wording. In this regard each and every concern counts as valuable feedback that requires addressing in a meaningful manner.

The object of this complaints resolution policy is to formalise the process in which dissatisfaction is lodged, acknowledged, investigated, resolved and leads to overall improvements.

It is furthermore important that each and every staff member receives extensive training in this regard, that this complaints resolution policy is made easily accessible to all policyholders, that this complaints resolution policy is continuously reassessed by senior management and that overall improvements are actioned as a consequence of feedback received from policyholders.

Important and guiding material/bodies include all six Treating Customers Fairly (TCF) Outcomes, the Financial Sector Conduct Authority (FSCA) and the Policyholder Protection Rules (PPR). Please note that TCF and PPR (especially with regards to complaints) form part of each and every employee’s annual performance evaluation report, which is to be completed prior to any potential salary increase and/or promotion.

The board of directors and Key Individuals of Dis-Chem Life is responsible for effective complaints management and must approve and oversee the effectiveness of the implementation of the complaint management framework.

2. Purpose

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

- fair outcomes for complainants;
- the fast, effective, and objective resolution of any complaint;
- proper and regular feedback to complainants;

- improved organisational effectiveness through learning from complainant feedback and root cause analysis;
- effective engagement between Dis-Chem Life and the relevant Ombudsman scheme;
- identification of possible service breakdowns and product or third-party challenges; and
- compliance with reporting requirements to the Registrar and / or the public where relevant.

3. Policy Statement

Dis-Chem Life 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:

- **Accessibility:** The complaints process is simple and easily accessible;
- **Client-centricity:** Clients will be treated with respect, and receive regular and clear, plain-language feedback;
- **Quality investigation:** Circumstances relating to a complaint will be investigated thoroughly;
- **Timely resolution:** Complaints must be resolved well within the timelines set out in this framework;
- **Impartial review:** The person responsible for complaints management's duties, reporting lines and performance agreement will ensure that they act impartially and objectively;
- **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. The definition of a Complaint

A Complaint means an expression of dissatisfaction by a person to Dis-Chem Life or, to the knowledge of Dis-Chem Life, to Dis-Chem Life's service provider relating to a financial product or financial service provided or offered by Dis-Chem Life which indicates or alleges, regardless of whether such an expression of dissatisfaction is submitted together with or in relation to a policyholder query, that:

- a. Dis-Chem Life 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 service provider or to which it subscribes;
- b. Dis-Chem Life or its service provider's maladministration or willful or negligent action or failure to act, has caused the person harm, prejudice, distress or substantial inconvenience; or
- c. Dis-Chem Life or its service provider has treated the person unfairly;

and excludes any complaint:

- a. upheld immediately by the person who initially received the complaint;
- b. upheld within Dis-Chem Life'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
- c. submitted to or brought to the attention of Dis-Chem Life 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.

The Treating Customers Fairly (TCF) Outcomes include:

- i. Customers need to feel confident that TCF is central to our culture;
- ii. Products are designed, marketed and sold to the right customer, meeting their needs;
- iii. Customers receive clear information that is timely and relevant to them;
- iv. Customers receive suitable product/sales advice that takes their circumstances into account;
- v. Products and services perform as expected and the service is of an acceptable standard;

- vi. There are no unreasonable barriers for customers to change or switch products, claim or complain.

All complaints lodged with the Ombudsman/FAIS/FSCA are to be dealt with by the Insurer, Guardrisk Life Limited “Guardrisk” (FSP 76), exclusively. All documents and information relating to such a complaint, must be sent to Guardrisk within 24 hours of receipt of the complaint.

Note that there is no fee charged for registering a complaint.

5. The definition of a complainant: Who may complain?

A complainant is a person who has a direct interest in the policy/service or someone acting on behalf of a person with a direct interest in the policy/service.

For example: a policyholder/a person that pays a premium, his/her beneficiary, a policyholder's spouse or registered dependents, a potential policyholder whose dissatisfaction relates to the relevant application, approach, solicitation, advertising or marketing material.

Therefore a complaint means a person who submits a complaint and includes a –

- a. Customer;
- b. person nominated as the person in respect of whom a product supplier should meet financial product benefits or that persons' successor in title;
- c. person whose life is insured under a financial product that is an insurance policy;
- d. person that pays a premium or an investment amount in respect of a financial product;
- e. member of a pension fund, provident fund, friendly society, medical scheme, or group scheme; or
- f. 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).

6. Outcomes of a complaint

There are two possible outcomes for a complaint:

1. **Rejected:** complaint was rejected, and Dis-Chem Life regards the complaint as finalized after advising the complainant that the Dis-Chem Life does not intend to take any further action to resolve the complaint. A formal letter will be provided to the complainant providing clear and adequate reasons for the decision together with the escalation process available, how to use such processes and the relevant time limits.
2. **Upheld:** complaint was successful in favour of the complainant either wholly or partially and that:
 - a. the complainant has explicitly accepted that the matter is fully resolved; or
 - b. it is reasonable for the provider to assume that the complainant has so accepted; and
 - c. all undertakings made by Dis-Chem Life 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.

7. The categories of complaints

The below list provides an indication of the categories into which a complaint may fall:

- a. The design of a policy or related service;
- b. Information provided to the policyholders or lack of information and feedback provided to a policyholder;
- c. Advice provided by the sales representative;
- d. Policy performance and/or servicing including negligence;
- e. Admin services such as premium collection;
- f. Policy accessibility, ability to change or switch;
- g. Complaints handling (complaint of a complaint);
- h. Complaints relating to insurance claims, such as a rejection of a merit assessment for litigation (in-Court) cover;
- i. Other complaints.

8. How to lodge 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:

- 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; and
- any other relevant responsibilities of a complainant.

Complaints should be lodged to:

- Dis-Chem Life (Pty) Ltd
- Tel: 080 000 0123
- Email: complaints@dischemlife.co.za
- Address: Atholl Towers, 129 Patricia Road, Sandown, Sandton, Gauteng, 2191
- Postal Address: Atholl Towers, 129 Patricia Road, Sandown, Sandton, Gauteng, 2191

On receipt of a complaint:

- the individual receiving the complaint will acknowledge receipt to the complainant straight away (time period extended in certain circumstances to at most 5 days) and advise the complainant of further steps that Dis-Chem Life will take and expected date of resolution;
- the Head of Research and Development will capture and classify the complaint in the complaint register and keep the register up to date with all developments and activities.

The Operations Team will:

- investigate the complaint further;
- resolve the complaint immediately if possible;
- make recommendations for resolution and obtain approval for a compensation or goodwill payment if relevant;
- revert with findings within 3 weeks from receipt of the complaint; and

- if the investigation and recommendation processes have not been finalized, advise the complainant and provide an expected date of resolution (by latest 3 weeks after receipt of the complaint).

9. The internal complaints handling process

The Dis-Chem Life employee dealing with the complaint will contact the complainant telephonically and proceed as follows:

- i. Ask the complainant what their preferred outcome of the complaint would be? Please refer to the outcomes of a complaint mentioned in clause 6;
- ii. Answer any and all questions to the best of his/her ability;
- iii. Request the complainant's availability/preferred times for follow-up calls and preferred communications medium for feedback (e-mail/ phone call/ SMS etc.);
- iv. Advise the complainant to kindly expect feedback within 7 days, alternatively 3 days where time is of the essence such as where a Court date is involved;
- v. Diarize the file for 3 days to provide feedback to the complainant but commence investigation immediately;
- vi. Should the matter remain unresolved after 3 days have passed and feedback has been provided, to diarize the complaints file in order to give feedback every 14 days;
- vii. The complainant may escalate the matter internally and change the person dealing with the complaint where he/she did not attend to the complaint as per the diary period (to receive feedback/assistance) as mentioned above. The same steps as per clause 8 will be followed to escalate the matter;
- viii. Should the matter be rejected as per clause 6, the complainant can escalate the complaint to the Ombud/ Regulatory Body.

10. Complaints escalation and review process

In the event that the matter/complaint is rejected, the complaint may be escalated to the Insurer directly:

- Guardrisk Life Limited
- Tel: 0860 333 361
- Email: complaints@guardrisk.co.za
- Address: The Marc, Tower 2, 129 Rivonia Road, Sandton, 2146
- Postal Address: PO Box 786015, Sandton, 2146

The complaint can also be lodged with the National Financial Ombud Scheme (NFOS). The procedure for lodging a complaint may be found on the NFOS website (www.nfosa.co.za) or you can obtain it directly from the NFOS using the following contact details:

- Tel: 0860 800 900
- E-mail address: info@nfosa.co.za
- Address: Claremont Central Building, 6th Floor, 6 Vineyard Road, Claremont, 7708

For complaints against the intermediary (e.g. a broker/sales person selling the product) for market related matters the complaint may be lodged with FSCA (Financial Sector Conduct Authority) online via <https://www.fsca.co.za/Pages/Contact-Us.aspx> or via the following contact details:

- Postal address: PO Box 35655, Menlo Park, 0102
- Telephone: +27-12- 428-8000
- Fax number: +27- 12- 346- 6941
- Email: info@fsca.co.za

Alternatively, a complaint may be logged with the FAIS Ombud. A complaint form needs to be completed, which can be downloaded from the FAIS Ombud's website (www.faisombud.co.za). The complaints registration form is also available from the FAIS Ombud at the following contact numbers:

- Telephone: (012) 762 5000
- Sharecall: (086) 066 3274
- E-mail address: info@faisombud.co.za
- Address: 125 Dallas Avenue Menlyn, Waterkloof Glen, Pretoria, 0010
- Postal address: PO Box 41, Menlyn Park, 0063

For complaints relating to the use of personal information, the complaint may be lodged with the Information Regulator using the following information:

- Telephone: (010) 023 5200
- Email address: Popiacomplaints@inforegulator.org
- Postal Address: PO Box 31533, Braamfontein, Johannesburg, 2017

11. Complaints about related/associated entities

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

The complaints process referred to must:

- be proportionate to the nature, scale and complexity of their business and risks;
- be clear on the responsibilities in relation to the handling and reporting of complaints;
- be appropriate for their business model, policies, services, policyholders, and beneficiaries;
- 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;
- not impose unreasonable barriers to complainants; and
- be fully compliant with the Financial Advisory and Intermediary Services Act (FAIS as well as the Policy Holder Protection Rules (PPR's).

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, Dis-Chem Life will forward the complaint to the party concerned, advise the client accordingly, and, where possible, facilitate the resolution process.

12. Recordkeeping and complaint's register

Dis-Chem Life will keep record of the complaint. 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.

13. Complaints Officer

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

The following responsibilities have been assigned to our Complaints Officer:

- monitoring social media platforms for complaints;
- recording and analysing complaints;
- monitoring resolution process deadlines and ensuring that these are complied with;
- recording all client communication that forms part of the resolution process;
- identify trends and provide regular feedback to senior management (at least at each board/executive committee meeting);
- thoroughly investigating complaints;
- regularly liaising with complainants;
- recommending (for each complaint) a suitable resolution to the management of Dis-Chem Life;
- providing general and ad hoc management information in respect of complaints received;
- liaising with the relevant Ombud scheme; and
- 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.

14. Consequences of Non-Adherence

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

15. 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.

16. Review

This policy will be reviewed regularly and as legislation changes.