



COMPLAINTS MANAGEMENT FRAMEWORK

PURPOSE

The purpose of this policy is to formalise the process in which dissatisfaction by a client is lodged, acknowledged, investigated, resolved and to ultimately lead to overall improvement/s within our organisation.

1. INTRODUCTION

PrestGroup is committed to high service standards in the rendering of financial services. Treating our Customers Fairly is central to PrestGroup's culture and as such it is important for us to formalise the process in which dissatisfaction is lodged, acknowledged, investigated and resolved to ultimately ensure fair treatment to our clients.

The objective is to ensure effective standards of complaints management in order to:

- Ensure fair outcomes for customers;
- Protect and enhance the PrestGroup's reputation;
- Allow for effective reporting, 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 complaint communication) and for recording customer complaints in a centralised manner;
- Improve organisational effectiveness through learning from client feedback and root cause analysis;
- Ensure effective management of complaints, in line with this framework;
- Ensure effective engagement between PrestGroup 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 a complaint.

This framework provides general principles to guide the way complaints are managed within PrestGroup and will be reviewed on an annual basis by our external compliance officer and will be signed off and implemented by the Key Individual of PrestGroup with the assistance of Legal & Compliance Department.

2. DEFINITIONS

2.1. **'Advice'** means, subject to subsection (3)(a) of the Financial Advisory and Intermediary Services Act, 37 of 2002, (hereafter, FAIS Act), any recommendation, guidance or proposal of a financial nature furnished, by any means or medium, to any client or group of clients:-

- In respect of the purchase of any financial product;
 - In respect of the investment in any financial product;
 - On the conclusion of any other transaction, including a loan or cession, aimed at the incurring of any liability or the acquisition of any right or benefit in respect of any financial product; or
 - On the variation of any term or condition applying to a financial product, on the replacement of any such product, or on the termination of any purchase of or investment in any such product, and irrespective of whether or not such advice:-
 - Is furnished in the course of or incidental to financial planning in connection with the affairs of the client; or
 - Results in any such purchase, investment, transaction, variation, replacement or termination, as the case may be, being effected;
- that results in the purchase, by the Complainant, of any product based on the advice.

2.2. **'Business Day'** means any day except a Saturday, Sunday, or public holiday.



2.3. **'Client Query'** means a request to the provider or the provider's service supplier by or on behalf of a client, for information regarding the provider's financial products, financial services or related processes, or to carry out a transaction or action in relation to any such product or service.

2.4. **'Complainant'** means a person who submits a complaint and includes a:-

- (a) Client;
- (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; 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).

2.5. **'Complaint'** means an expression of dissatisfaction by a person to a provider or, to the knowledge of the provider, to the provider's service supplier relating to a financial product or financial service provided or offered by that provider which indicates or alleges, regardless of whether such an expression of dissatisfaction is submitted together with or in relation to a client query, that:-

- (a) The provider or its service supplier 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;
- (b) The provider or its service supplier's maladministration or willful or negligent action or failure to act, has caused the person harm, prejudice, distress, or substantial inconvenience; or
- (c) The provider or its service suppliers has treated the person unfairly.

2.6. **'Compensation payment'** means a payment, whether in monetary form or in the form of a benefit or service, by or on behalf of a provider to a complainant to compensate the complainant for a proven or estimated financial loss incurred as a result of the provider's contravention, non-compliance, action, failure to act, or unfair treatment forming the basis of the complaint, where the provider accepts liability for having caused the loss concerned, but excludes any:-

- (a) Goodwill payment;
- (b) Payment contractually due to the complainant in terms of the financial product or financial service concerned; or
- (c) Refund of an amount paid by or on behalf of the complainant to the provider where such payment was not contractually due; and includes any interest on late payment of any amount referred to in (b) or (c).

2.7. **'Goodwill payment'** means a payment, whether in monetary form or in the form of a benefit or service, by or on behalf of a provider to a complainant as an expression of goodwill aimed at resolving a complaint, where the provider does not accept liability for any financial loss to the complainant as a result of the matter complained about.

2.8 **'Member'** in relation to a complainant means a member of a:-

- (a) Pension fund as defined in section 1(1) of the Pension Funds Act, 52 of 1956;
- (b) Friendly society as defined in section 1(1) of the Friendly Societies Act, 25 of 1956;
- (c) Medical scheme as defined in section 1(1) of the Medical Schemes Act, 131 of 1998;
- (d) Group schemes as contemplated in the Policyholder Protection Rules made under section 62 of the Long-term Insurance Act, 1998, and section 55 of the Short-term Insurance Act, 1998.

2.9. **'Policyholder query'** means a request to the insurer or the insurer's service provider by or on behalf of a policyholder, for information regarding the insurer's policies, services, or related processes, or to carry out a transaction or action in relation to any such policy or service.

2.10. **'Rejected'** in relation to a complaint means that a complaint has not been upheld and the provider regards the complaint as finalised after advising the complainant that it does not intend to take any further action to resolve the complaint and includes complaints regarded by the provider as unjustified or invalid, or where the complainant does not accept or respond to the provider's proposals to resolve the complainant.

2.11. **'Reportable complaint'** means any complaint other than a complaint that has been:-

- (a) Upheld immediately by the person who initially received the complaint;
- (b) Upheld within the provider'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 the provider in such a manner that the provider does not have a reasonable opportunity to record such details of the complaint as may be prescribed in relation to reportable complaints.

2.12. **'Upheld'** means that a complaint has been finalised wholly or partially in favour of the complainant 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 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.

2.13 **'Complaints Management'** means the management of the entire lifecycle of a complaint. This starts with the ease of process for the client to lodge complaints and the associated communication. It includes the way complaints are handled, recorded, resolved and quality controlled; the way people involved in complaints management processes are managed and trained; the way decisions are made; the way clients' trust is restored; the way the reports are compiled and analysed; and ultimately the way business learns from the feedback gleaned from complaints and takes corrective and proactive action accordingly.

2.14. **'Complaints Management Head'** the individual appointed by the Managing Director to serve as head of the complaints management function within PrestGroup. The role of the Complaints Management Head and the terms of their appointment as amended is determined by the Managing Director.

2.15. **'Complaints Reporting Process'** is the process in which the complaint is manually recorded into the internal Complaints Register to record, classify, route, escalate, and resolve individual complaints received by the business. In relation to the Complaints Management function as a whole, the system is used by the business to monitor, analyse, and report on PrestGroup's performance in relation to Complaints Management.

2.16.. **'Complaints Handling'** the process of attending to and resolving complaints including ongoing interaction with Complainants. It is expected that this process meets certain minimum standards.

2.17. **'Complaint Handling Staff'** any person that is responsible for making decisions or recommendations in respect of complaints generally or a specific complaint, this person must:-

- Be adequately trained;
- Have an appropriate mix of experience, knowledge and skills in complaints handling, fair treatment of customers, the subject matter of the complaints concerned and relevant legal and regulatory matters;
- Not be subject to a conflict of interest; and
- Be adequately empowered to make impartial decisions or recommendations.

2.18.. **'Evidence'** means the information PrestGroup has obtained in order to review, adjudicate and resolve a complaint and shall include all information submitted by an entity as well as from the Complainant and shall be stored and recorded on the complaints management system or other repositories for storing and recording information. This shall include, but is not limited to, claims forms, administration documentation, sales and other recordings, application forms, policy documentation, premium payment history etc.

2.19. **'FAIS Complaint'** means a specific complaint, submitted by a Complainant to the FAIS Ombudsman or PrestGroup/ the Insurer for purposes of resolution by PrestGroup/the Insurer, relating to a financial service rendered by PrestGroup or its representative to the Complainant on or after the date of commencement of the FAIS Act, and in which complaint it is alleged that PrestGroup or its representative has:-

- (a) Contravened or failed to comply with a provision of the FAIS Act and that as a result thereof the Complainant has suffered or is likely to suffer financial prejudice or damage;
- (b) Willfully or negligently rendered a financial service to the Complainant which has caused prejudice or damage to the Complainant or which is likely to result in such prejudice or damage; or
- (c) Treated the Complainant unfairly.

2.20. **'FAIS Ombud Complainant'** means a client who submits a complaint to the FAIS Ombudsman in relation to the application of a policy and includes advice rendered.

2.21. **'Intermediary Service'** means, subject to subsection (3)(b) of the FAIS Act, any act other than the furnishing of advice, performed by a person for or on behalf of a client or product supplier:-

- The result of which is that a client may enter into, offers to enter into or enters into any transaction in respect of a financial product with a product supplier; or
- With a view to:-



- Buying, selling or otherwise dealing in (whether on a discretionary or non-discretionary basis), managing, administering, keeping in safe custody, maintaining or servicing a financial product purchased by a client from a product supplier or in which the client has invested;
- Collecting or accounting for premiums or other moneys payable by the client to a product supplier in respect of a financial product; or
- Receiving, submitting, or processing the claims of a client against a product supplier.

2.22. **'Non-Complainant'** customers who have been treated fairly and who did not submit a complaint.

2.23. **'NFO'** refers to the Ombudsman for Short Term Insurance.

2.24. **'NFO Complaint'** for the purposes of this policy, a complaint submitted to the NFO in relation to any other matter other than the application of a policy relating to advice rendered.

2.25. **'Outsourcing Agreement'** mean any arrangement of any form between PrestGroup and another person, whether that person is regulated or supervised under any law or not, in terms of which that party performs a function that is integral to the nature of PrestGroup business, which would otherwise be performed by PrestGroup in conducting insurance business, and includes rendering services under a binder agreement, but excludes rendering services as intermediary.

2.26. **'Reports/Reporting'** means any periodic or ad-hoc reports (and related documents) obtained from the complaints management system and other sources in the business which shall be used for analysis, monitoring, submissions to regulatory authorities, and the making of recommendations to the business.

3. KEY PRINCIPLES AND STANDARDS FOR EFFECTIVE COMPLAINTS MANAGEMENT

The following principles and standards shall apply to the complaints management processes within PrestGroup:-

- 3.1. **Accessibility** – PrestGroup makes complaints reporting visible to customers on all key documents provided to them as well as on its website.
- 3.2. **Client-centricity** – complaint handling staff are expected to demonstrate the right attitude toward every client.
- 3.3. **Quality of investigation** – PrestGroup will take reasonable steps to gather and investigate all relevant information and circumstances when handling complaints.
- 3.4. **Timely resolution** – PrestGroup's quality standards recognise that all complaints must be resolved in a timely manner and in line with timelines set out in this framework.
- 3.5. **Consistent and objective decision-making** – PrestGroup will ensure that employees and decision-makers avoid bias when handling complaints so that principles of fairness and objectivity are upheld.
- 3.6. **Independent review** – PrestGroup will provide additional opportunities for independent review of complaints in line with escalation and review process contained in this framework. Where required, segregation of duties and escalation procedures will be utilised to maintain and safeguard independence of employees responsible for handling complaints.
- 3.7. **Confidentiality of client information and data** – as far as possible, PrestGroup will maintain the confidentiality of customers' personal information and comply with the relevant legislation to ensure that internal controls are in place for safeguarding of data.
- 3.8. **Accuracy of record-keeping** – complaints must be accurately, efficiently, and securely recorded.
- 3.9. **Communication before, during and after complaint** – PrestGroup will provide customers with clear upfront communication concerning how they can complain and how their complaint will be handled.
- 3.10. **Quality Assurance** – PrestGroup will ensure that there is an appropriate quality assurance in place to monitor that the standards referred to in this framework are adhered to.
- 3.11. **Meaningful Management Information and Analysis** – useful management information reports pertaining to complaints will be developed and implemented, subject to regulatory requirements and business needs.



4. ALLOCATION OF RESPONSIBILITIES

The table below outlines the roles and responsibilities of the stakeholders responsible for governance of the framework:

Responsibility	Structure	Interest, Duties & Responsibilities
Supervision	Key Individual (hereafter, KI)	The KI is ultimately responsible for the requirements of this framework but delegates some functions to managers, and any other employees as required.
	Legal and Compliance	<p>Legal & Compliance must approve changes to this framework and monitor adherence to this framework. Legal & Compliance is responsible for:</p> <ul style="list-style-type: none"> Ensuring that all committees, forums, and individuals who have responsibility under the policy fulfil their responsibilities in a timely and diligent manner. Governance of the applicable assurance provider's assessment of compliance with a framework. Assigning and monitoring remediation of any non-compliance or other findings by the assurance provider.
Operational Implementation	Key Individual	Approves and oversees the effectiveness of this framework.
	Legal and Compliance	<p>Assists the Key Individual by:</p> <p>Implementing the requirements of this framework;</p> <ul style="list-style-type: none"> Providing on-going guidance to the business on matters relating to this framework; Monitoring on-going operating effectiveness of the framework; and Reporting to the business PrestGroup's performance and adherence in relation to requirements, procedures and standards set out in this framework.
	Complaint Handlers	Implement, communicate, and ensure that all complaints are managed in accordance with this framework.
Consulted	Compliance	<p>Compliance is responsible for:</p> <ul style="list-style-type: none"> Reviewing adherence to the requirements outlined by this framework; Ensuring that this framework remains in line with legislation.
Informed	Key Individual	Is kept informed of complaints received and whether or not there was compliance with this framework in the resolution thereof.



5. COMPLAINT MANAGEMENT PROCESS AND CATEGORISATION OF COMPLAINTS

All complaints must be centralised and send to complaints@prestgroup.co.za. Alternatively a complainant may phone our office on telephone number (011) 453 9002 to lodge a complaint. All communication with complainants must be in plain language.

PrestGroup will ensure that regular monitoring is done on compliance with as well as the effectiveness of this framework generally.

6. PROCESS FOR COMPLAINTS RELATING TO A PRESTGROUP ERROR, EMPLOYEE OR SERVICE

6.1. The complaint channels above will be monitored by the complaint handling staff on a daily basis.

6.2. Each complaint received by internal departments must be logged with the legal and compliance department within **24 hours** after receipt.

6.3. Each complainant will be recorded on the complaints register within **48 hours** after receipt.

6.4. The following details will be captured in respect of each reportable complaint:-

- All relevant details of the complaint and the subject matter of the complaint;
- Copies of all relevant, evidence, correspondence and decisions;
- The complaint categorisation as set out below:
 - (i) Complaints relating to 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;
 - (ii) Complaints relating to information provided to clients;
 - (iii) Complaints relating to advice;
 - (iv) Complaints relating to financial product or financial service performance;
 - (v) Complaints relating to service to clients, including complaints relating to premium or investment contribution collection or lapsing of a financial product;
 - (vi) Complaints relating to financial product accessibility, changes or switches, including complaints relating to redemptions of investments;
 - (vii) Complaints relating to complaints handling;
 - (viii) Complaints relating to insurance risk claims, including non-payment of claims; and
 - (ix) Other complaints categories relevant to our business model, policies, services, and client base.
- PrestGroup will categorise, record and report on reportable complaints by identifying the category contemplated above to which a complaint most closely relates and group complaints accordingly.
- If necessary, the complaint will be referred to the insurer.

6.5. An acknowledgement of receipt will be sent to the complainant on the day that the complaint is recorded but within 48 hours and the acknowledgement will contain the following information:-

- Contact details of the person or department that will be handling the complaint;
- Indicative 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; and
- Details of escalation of complaints to the office of a relevant ombud where applicable.

6.6. A decision will be made on each complaint as soon as is reasonably possible but within a period not exceeding a maximum of **15 working days** after taking reasonable steps to gather and investigate all relevant and appropriate information and circumstances, with due regard to the fair treatment of complainants.

6.7. Each complainant must be kept adequately informed of the progress of their complaint, causes of any delay in the finalisation of a complaint and revised timelines.

6.8. PrestGroup will ensure that customers who are financially prejudiced as a result of our contravention, non-compliance, action, failure to act, or unfair treatment are fairly compensated.

6.9. A written response will be sent to a complainant or their authorised representative once the complaint is finalised.

6.10. Where a complaint is upheld, any commitment 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.



6.11. Where a complaint is rejected, the complainant will be provided with clear and adequate reasons for the decision and be informed of the escalation or review process, including how to use it and any relevant time limits.

PrestGroup shall make available in our office and on our website details of information required from complainants regarding;

- Where, how and to whom the complaints and related information must be submitted;
- Expected turnaround times in relation to complaints; and
- Any other relevant responsibilities of complainants.

PrestGroup will analyse complaints reports extracted from the complaint register on a monthly basis. Findings on identified risks, trends and actions will be contained in market conduct reports that are presented to executive forums and management.

7. RECORD KEEPING, MONITORING AND ANALYSIS OF COMPLAINTS

PrestGroup ensures accurate, efficient, and secure recording of complaints and complaints-related information. The following is recorded in respect of each reportable complaint:-

- (i) All relevant details of the complainant and the subject matter of the complaint;
- (ii) Copies of all relevant evidence, correspondence and decisions;
- (iii) The complaint categorisation as set out above (section 6 subsection 4);
- (iv) Progress and status of the complaint, including whether such progress is within or outside any set timelines.

PrestGroup maintains the following data in relation to reportable complaints categorised in accordance with section 6 subsection 4 on an ongoing basis:-

- (i) Number of complaints received;
- (ii) Number of complaints upheld;
- (iii) Number of rejected complaints and reasons for the rejection;
- (iv) Number of complaints escalated by complainants to the internal complaints escalation process;
- (v) Number of complaints referred to an ombud and their outcome;
- (vi) Number and amounts of compensation payments made;
- (vii) Number and amounts of goodwill payments made; and
- (viii) Total number of complaints outstanding.

PrestGroup will scrutinise and analyse the complaints information on an ongoing basis and will utilise the information to manage conduct risks and effect improved outcomes and processes for its clients, and to prevent recurrences of poor outcomes and errors.

8. SOCIAL MEDIA COMPLAINTS

Social media complaints are monitored by the PrestGroup's marketing team. The said complaints will be centralised to the complaint channels as noted above. The relevant complaint handling staff member will log the complaint immediately and liaise with management to formulate a response that will be posted to the relevant social media platform as soon as possible. The complaint will then be investigated and handled in accordance with the policy as set out above.

9. COMPLAINTS ESCALATION AND REVIEW PROCESS

All received complaints will be referred to management for consideration by the PrestGroup staff member who received the complaint. Complex or unresolved complaints may be referred to top management if required. The centralised complaints email address is set up to automatically divert through to PrestGroup's Managing Director.

The person will acknowledge receipt of the complaint escalation within **48 hours** and inform the referrer of:

- Details of information required from referrer;
- Where, how and to whom the complaints and related information must be submitted;
- Expected turnaround times to finalise the complaint escalation or review;
- Any other relevant responsibilities of the referrer.



The person will inform the referrer of the outcome of the referral within **15 working days** after receipt of the complaint. The person responsible will ensure that decisions are impartial and will have due regard to the fair treatment of customers at all times.

10. PROCESS OF NOTIFYING THE RELEVANT INSURER OF COMPLAINTS

- We at PrestGroup take responsibility to handle all complaints received appropriately and ensure that we are compliant with all relevant rules and regulations. This includes any requirements to acknowledge complaints, provide information to the complainant and meet applicable time limits.
- We undertake to notify the relevant insurer within 14 days of receipt of the complaint by using the processes and procedures as determined by the applicable insurer.
- We undertake to send a copy of all formal and serious matters regarding complaints and their responses, as well as the original complaint to the relevant insurer within 48h of the response being issued.

In the event of a any legal proceedings, any documetation received will immediately be send to the relevant insurer.

The client may also at any time, lodge a complaint with the relevant insurer. Details of the insurer, the policy and contact details are disclosed on all policy documents as required by law.

11. ENGAGEMENT WITH OMBUD SERVICES

PrestGroup clearly and transparently communicates the availability and contact details of the relevant Ombudsman schemes to customers on all applicable disclosure documentation. Although PrestGroup cannot control when a client will escalate a complaint to the respective Ombudsman, PrestGroup will always:

- Maintain open and honest communication and co-operation between ourselves and any Ombud with whom we deal; and
- Endeavour to resolve a complaint before a final determination or ruling is made by an Ombud, without impeding or unduly delaying a complainant's access to an Ombud.

PrestGroup will maintain specific records and carry out specific analysis of complaints referred to the Ombudsman and their outcomes. Furthermore, PrestGroup monitors determinations (whether involving our business or others), publications and guidance issued by the relevant Ombudsman with a view to identify failings of risks in PrestGroup's products, services or practices and to be aware of such rulings or determinations in relation to claims process and interpretation of policy provisions across the board.

12. COMPLAINTS REFERRED TO THE OFFICE OF THE OMBUDSMAN IN RESPECT OF FINANCIAL SERVICES RENDERED BY PRESTGROUP IN ACCORDANCE WITH THE FAIS ACT

As an FSP we are obliged to maintain an Internal Complaints resolution process which includes the maintenance of a comprehensive complaints' framework outlining our commitment to and procedures for internal resolution of complaints which are required to be handled in accordance with the FAIS Act.

Communication and Escalation Process pertaining to 'FAIS' related complaints

Internal Communication

The table in section 4 above outlines the roles and responsibilities of the stakeholders responsible for governance of this framework.

- Each governance structure specified above will receive routine feedback and communication related to the functioning of this framework on a periodic basis;
- Ad-hoc or non-routine communication may be performed from time to time.

External Communication

Reporting to the Financial Sector Conduct Authority (hereafter, FSCA) must be done on an annual basis in respect of all FAIS complaints received for the reporting period, or as requested by the FSCA.

Elements of a Complaint: Pertaining to 'FAIS' related complaints

In terms of the FAIS Act, a complaint must relate to a financial service rendered by PrestGroup to the complainant, in which it is alleged that PrestGroup:

- Has contravened or failed to comply with the FAIS Act and that as a result thereof the complainant has suffered or is likely to suffer financial prejudice or damage;



- Has willfully or negligently rendered a financial service to the complainant which has caused prejudice or damage to the complainant or which is likely to result in such prejudice or damage; or
- Has treated the complainant unfairly.

The elements of a complaint are:-

- It must be in respect of advice and/or intermediary services provided at any time after the 1st of October 2004; and
- The complainant must have suffered, or is likely to suffer, a financial loss as a result of failure on the part of PrestGroup to comply with the FAIS Act; or
- The complainant must have suffered, or is likely to suffer, financial loss as a result of PrestGroup having willfully or negligently rendered advice and/or intermediary services to the complainant, which has caused prejudice or damage to the complainant, or which is likely to result in such prejudice or damage; or
- PrestGroup treated the complainant unfairly.

PrestGroup's FAIS Complaints Resolution Principles

The following are PrestGroup's principles which must be followed by all employees involved in the management and resolution of FAIS complaints:

- This framework will at all times be available to complainants upon request, and/or may be accessed at any time through the PrestGroup website. The availability of the said document will be made known in relevant business documents and/or communications to complainants.
- FAIS complaints must be submitted in writing and must contain all relevant information and copies of all relevant documentation must be attached thereto.
- All FAIS complaints will be logged with the internal legal and compliance officer by the complaint handling staff member within **24 hours** after receipt and relevant management will be made aware of the matter;
- Management will send a written acknowledgement of receipt to the complainant within **24 hours**.
- Management will assess the merits of the complaint to make a determination, either wholly or partially in favour of the complainant or the company.
- PrestGroup shall have **6 weeks** in which to respond to a complaint received from the FAIS Ombudsman.
- All attempts to resolve the complaint will be undertaken and the final decision will be communicated to the complainant in writing once a final decision is made.
- Such outcome must also be communicated to the FAIS Ombudsman.
- As stipulated in the FAIS Act, where a complaint cannot be resolved within six (6) weeks of receipt, PrestGroup will send a written correspondence to the complainant informing the complainant that they may refer the complaint to the Office of The Ombudsman for Financial Services Providers within **six (6) months** of the date of the final correspondence from PrestGroup.
- In the event of a dismissal of a complaint by PrestGroup, the complainant, if unsatisfied with the dismissal, may pursue further proceedings before the Office of The Ombudsman for Financial Services Providers in respect of such complaint.
- Where a complainant remains unreasonable, and/or rejects any offer made, this too must be communicated to the FAIS Ombudsman. Any offer made that is accepted by the complainant must also be communicated to the FAIS Ombudsman.
- There will be adequate training of all relevant staff, including imparting and ensuring full knowledge of the provisions of the FAIS Act, the Rules of the Office of The Ombudsman for Financial Services Providers and the FAIS Act General Code of Conduct, with regard to the management and resolution of FAIS complaints.

Internal analysis will be done on trends to avoid re-occurrence of similar FAIS complaints, and/or to improve services and complaints systems and procedures where necessary.

For complaint against PrestGroup as FSP/Intermediary, complaint to be lodge with the FAIS Ombud with details below:

FAIS Ombud details:

- Physical address: Baobab House, Eastwood Office Park, Lynnwood Road, Pretoria
- Postal address: PO Box 74571, Lynnwood Ridge, 0040
- Contact number: Tell: +(0) 12 470 9080
- Fax no: 012 348 3447
-
- Website: www.faisombud.co.za

13. COMPLAINTS REFERRED TO THE NATIONAL FINANCIAL OMBUD SCHEME (NFO)



- For complaints against the insurer, please lodge complaint with the National Financial Ombud Scheme (NFO)

NFO details:

- Physical address: 1 Sturdee Avenue, 1st Floor, Block A, Rosebank, Johannesburg, 2196
- Postal address: PO Box 32334 , Braamfontein, 2017
- Contact number: Tel: +27 (0) 11 726 8900 / Share Call: 0860 726 890
- Fax no: +27 (0) 11 726 5501
- Website: www.NFO.co.za

- NFO complaints will be referred to the relevant insurer for resolution.
 - PrestGroup undertakes to be of assistance to all parties involved to ensure that the complaint is handled in accordance with Policyholder Protection Rules (hereafter, PPR) and the guidelines and definitions stipulated in the Terms of Reference for the NFO.
 - Specifically, turnaround times for resolving complaints and the quality standards applied to such Ombudsman complaints must adhere to the stipulations and requirements prescribed by the NFO as applicable.
 - In accordance with this policy, where PrestGroup is involved in handling a complaint that has been referred to the NFO the following procedures shall apply
 - The NFO submits complaints directly to PrestGroup who in turn will advise the relevant insurer of complaint. Responses are to be directed to the office of the NFO unless directed by the office of the NFO to respond directly to the complainant. In each instance, full details of the decision together with all supporting documentation must be submitted back to the NFO with **2 weeks** from the submission date. The NFO prefers that, where possible, the respective insurer or entity resolves the matter without mediation.
 - PrestGroup will abide by the determinations (and related appeal processes) made by the Ombud. If the Ombud rule against PrestGroup, PrestGroup has the right to appeal the decision.
 - A complaint may also be lodge with the **Financial Services Conduct Authority** online www.fsca.co.za/Pages/Contact-Us
- Please note the following regarding the office of the Ombud:
 - The Ombud will generally decline to investigate a complaint if a period of more than 3 years has expired since the act or omission which resulted in the complaint.
 - The Ombud will generally decline to investigate a complaint, if proceedings have been instituted by the complainant in any court relating to the complaint
 - Should the complainant not lodge the complaint with the Ombud, the complainant may pursue any other avenue of law which is available to it.
 - The Ombud will generally only investigate a complaint where the financial loss suffered by the complainant is equal to or less than the regulated monetary limits as per legislation. This amount is subject to review from time to time.
 - The Ombud may decline to investigate a complaint if there is reasonable grounds to believe that a more appropriate dispute resolution process is available or in cases where it will be more appropriate to deal with the complaint in Court.
 - The Ombud will only proceed to investigate a complaint if it has informed every other interested party of the receipt of such complaint, has provided particulars of such complaint to those parties and has provided those parties with the opportunity to respond.
 - The Ombud may follow and implement any procedure which it deems fit and may allow any party the right of legal representation.
 - The Ombud may make recommendations to the parties and if accepted by the parties, such recommendation will have the effect of a final determination.
 - The Ombud will in any case, where a matter has not been settled or a recommendation has not been accepted by the parties, make a final determination which may include dismissal of the complaint or upholding of the complaint. If a complaint is upheld:
 - The complainant may be awarded compensation; or
 - PrestGroup/Insurer may be ordered to take certain steps; or
 - The Ombud may make any other order which a Court may make.



ROLES, RESPONSIBILITIES AND CONTACT DETAILS

ROLE	RESPONSIBILITY	EMAIL ADDRESS
General		complaints@prestgroup.co.za
Managing Director	Riaan Grobbelaar	riaan@prestgroup.co.za
Marine Department		
Marine Director	Leonie van Rooyen	leonie@prestgroup.co.za
Marine Divisional Director	Susan Duvenage	susan@prestgroup.co.za
Marine Divisional Director	Jean Roos	jean@prestgroup.co.za
Commercial Department		
Commercial Divisional Director	Cecile Myburgh	cecile@prestgroup.co.za
Financial Department		
Financial Director	Gawie Badenhorst	gawie@prestgroup.co.za
Legal and Compliance	Leonette Kruger	leonette@prestgroup.co.za

A handwritten signature in black ink, appearing to read 'L Kruger'.

Leonette Kruger
Legal and Compliance



POLICY DETAILS

Policy Name	Complaints Resolution Policy
Effective Date	01/10/2019
Date of Last Revision	01/01/2024
Administrator Responsible	Leonette Kruger
Contact Information	leonette@prestgroup.co.za
Applies to	Clients, All Departments and staff
	Management
Version	4
Author	Leonette Kruger