

COMPLAINTS **MANAGEMENT POLICY**

OLD MUTUAL INSURE LIMITED

DO GREAT THINGS



OLD MUTUAL
INSURE



We at Old Mutual Insure value our Customers/ Brokers/ 3rd parties/ suppliers (herein after referred to as the 'Complainant' and we hereby state our commitment to handling **all** complaints effectively and timeously.

First and foremost, the General Code of Conduct issued under the Financial Advisory and Intermediary Services Act 37 of 2002 (FAIS Act) sets out the requirements for the maintenance of a complaints policy.

Secondly to this, the SAIA Code of Conduct requires from its members to adhere to certain minimum standards regarding complaints handling procedures.

In addition to this, the Financial Services Board (FSB) introduced a policy of Treating Customers Fairly (TCF). This regulation will ensure that the following fairness outcomes are delivered.

Outcome 1: Customers are confident that they are dealing with firms where the fair treatment of customers is central to the firm's culture.

Outcome 2: Products and services marketed and sold in the retail market are designed to meet the needs of identified customer groups and are targeted accordingly.

Outcome 3: Customers are given clear information and are kept appropriately informed before, during and after the time of contracting.

Outcome 4: Where customers receive advice, the advice is suitable and takes account of their circumstances.

Outcome 5: Customers are provided with products that perform as firms have led them to expect, and the associated service is both of an acceptable standard and what they have been led to expect.

Outcome 6: Customers do not face unreasonable post-sale barriers to change product, switch provider, submit a claim or make a complaint.

This document, in line with the applicable regulatory and industry requirements, serves to establish an effective internal complaints management system and procedures.

Policy Statement

Old Mutual Insure is committed to:

- dealing with complaints in a timely and fair manner, with each complaint receiving due consideration in a process that is managed appropriately and effectively;
- providing complainants with easy access to our complaints resolution process via any of our branches, postal and fax services, telephone, e-mail and the Old Mutual Insure website;
- ensuring that the internal complaints process is transparent and visible so that complainants have full knowledge of what procedures to follow in order for their complaints to be resolved;
- ensuring that where a complaint is resolved in favour of the complainant, a full and appropriate level of redress is offered to the complainant, without delay;

- making available adequately trained staff that possess the necessary skills and expertise to handle complaints effectively;
- Establishing a mechanism for the escalation of complaints up to Senior Management and Board level. These complaints will be monitored by the Compliance Department;
- implementing internal follow-up procedures to ensure improvement of service and avoidance of those occurrences that give rise to complaints (Senior Management and Board will be regularly informed on trends);
- Ensuring that records of complaints are maintained for a period of 5 years. Providing compensation to customers who have been substantially affected by failures in our service delivery. The award of compensation will be considered, at the discretion of Old Mutual Insure, where financial loss or severe inconvenience is caused by our service delivery failure. Compensation may be financial or non-financial.

Old Mutual Insure defines a complaint and a query as follows:

A complaint is an expression of dissatisfaction by a complainant, oral or written, about the service or product that we have/are providing to them. We will use the following as guidelines to establish if an issue is a complaint:

1. Are we outside our SLA? Have we fallen short of the standards that we have set ourselves and communicated to our Customers?
2. Does the issue require escalation of decision?
3. Does the complainant clearly state that they are dissatisfied or want to complain?
4. When our Customers tell us that they are not happy about our service or product and want a response from us.
5. When the complainant uses any of the complaints channels, e.g. complaints@ominsure.co.za, Called the CEO's office to complain, Hellopeter, Formal letter of complaint, called the complaint number, logged a complaint on our website.

A query

1. Involves a customer or broker asking about details on a policy (e.g. wrong address, errors in the policy) and is dealt with and resolved immediately
2. A question for e.g. when will my claim be paid? How long will it take to resolve my issue? How far are you in processing my claim? How did you arrive at the settlement amount?

Categories of Complaints

There are two categories of complaints:

1. A **General Complaint as defined above.**
2. In particular, the FAIS Act defines a complaint as follows:
A specific complaint relating to a financial service rendered by a financial services provider or representative to the complainant on or after the date of commencement of the Act, and where it is alleged that the provider or representative has:
 - (a) contravened or failed to comply with a provision of the Act and that as a result thereof the complainant has suffered or is likely to suffer financial prejudice or damage;



(b) wilfully 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;

(c) Treated the complainant unfairly.

A complaint will therefore only qualify as a **FAIS Complaint** if it complies with one or more of the requirements in the above definition. These complaints will most likely have to do with matters relating to the giving of advice and rendering of intermediary services that are covered in the FAIS General Code of Conduct.

OLD MUTUAL INSURE COMPLAINTS RESOLUTION PROCEDURE

Customer Complaints

Old Mutual Insure recognises that every Customer / Broker/ 3rd party/supplier (herein after referred to as the 'Complainant' has a right to complain. Our complaints handling process affords you the opportunity to do so. Your feedback is valued as it allows us to continuously improve our service and processes, and affords us the opportunity to change bad experiences into positive ones.

How to complain to Old Mutual Insure

- Your complaint must be in writing (letter, fax, e-mail or website) or telephonically with an official of Old Mutual Insure.
- Provide: Name and Address Details and Policy Number, Claim Number or ID number of the insured.
- Be specific about the complaint and provide all the important facts (including events) that may have a bearing on the complaint.
- Provide copies of all documents that have relevance to the complaint (i.e. letters, quotations, previous correspondence etc.).
- Provide proof of any losses sustained where applicable.
- Specify a solution / remedial action you believe is required to resolve your complaint.

Our Contact Details

The contact details for the Old Mutual Insure Customer Care Centre are as follows:

Postal address: PO Box 1120, Johannesburg, 2000

E-mail: complaints@ominsure.co.za

Telephone: 0860 634357

Fax number: +27 (0)11 374-3089

Website: www.ominsure.co.za under the "Contact Us" option.

Our Complaint Process

All complaints will be acknowledged in writing and sent to you either via post, e-mail or fax, depending on the communication method chosen by yourself.

1. Once the complaint has been received, it will be allocated to the appropriate area for resolution. A letter of acknowledgement for the receipt of the complaint will be despatched within two (2) business days.

Please note that as delivery of e-mails to Old Mutual Insure cannot be guaranteed, should no acknowledgement of a complaint submitted be received within three (3) business days, kindly contact Old Mutual Insure's Customer Complaints department in the Customer Experience Area (details above) to follow up.

2. Where a complaint cannot be addressed within fifteen (15) business days of receipt thereof, Old Mutual Insure will inform you accordingly.
3. You will be notified of the outcome of your complaint in writing. If the outcome of the complaint is not favourable to yourself, full written reasons will be provided within six (6) weeks of receipt of your complaint.
4. If within six weeks of receipt of your complaint Old Mutual Insure has been unable to resolve the complaint to the satisfaction of yourself, and if you wish to pursue the matter further, your complaint may be lodged with the **Ombudsman for Short-term Insurance**.

4.1. The contact details for the Ombudsman for Short Term Insurance are as follows:

Postal Address	Tel. : (011) 726-8900
P O Box 32334	Tel. : 0860 726 890
Braamfontein	Fax : (011) 726-5501
2017	E-mail : info@osti.co.za

5. In the same circumstances as per the above, but **specifically** where complaints:
 - 5.1. relate to a financial service rendered by Old Mutual Insure or a representative (Broker/ intermediary) of Old Mutual Insure and where it is alleged that Old Mutual Insure or our representative:
 - (a) has 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; or
 - (b) has wilfully or negligently rendered a financial service to the complainant which has, or which is likely to, cause prejudice or damage to the complainant; or
 - (c) has treated the complainant unfairly;

And

- 5.2. Does not constitute a monetary claim in excess of R800,000 unless Old Mutual Insure has agreed in writing to this limitation being exceeded, or the complainant has abandoned the amount in excess of R800, 000. Then:
 - (a) The complaint may be referred to the **FAIS Ombudsman**; and
 - (b) The complainant should:
 - i. refer the matter to the FAIS Ombudsman within six months of receipt of Old Mutual Insure's notification; and



II. Produce to the Ombudsman Old Mutual Insure's final response as well as the complainant's reasons for disagreeing with such final response.

5.3. The contact details for the FAIS Ombudsman are as follows:
Customer Contact Division, The FAIS Ombudsman
Celtis House, Eastwood Office Park
Lynnwood, Pretoria

Postal Address:
PO Box 74571
Lynnwood Ridge
0040

Tel. : (012) 470-9080
Tel. : 0860 324 766
Fax : (012) 348-3447
E-mail : info@faisombud.co.za