

## COMPLAINTS PROCESS FRAMEWORK

|                         |                                                                               |
|-------------------------|-------------------------------------------------------------------------------|
| <b>FSP NAME</b>         | Groups Are Us (Pty) Ltd                                                       |
| <b>FSP NUMBER</b>       | 45735                                                                         |
| <b>FSP ENTITY</b>       | Credit Life And Funeral Cover Insurance                                       |
| <b>PHYSICAL ADDRESS</b> | Groups Are Us Building<br>34 Newton Street<br>Newton Park<br>Gqeberha<br>6055 |
| <b>TELEPHONE NO</b>     | 041 004 0114                                                                  |
| <b>POLICY DATE</b>      | 31 March 2025                                                                 |
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## 1. OVERVIEW

This is the official Complaints Resolution Manual implemented for Groups Are Us (Pty) Ltd t/a Groups R Us.

## 2. PURPOSE

The Financial Advisory and Intermediary Services Act (FAIS Act) requires that a financial service provider must maintain an internal complaints resolution system and procedure in the event that a customer complains about a financial service rendered by the financial services provider.

Treating Customers Fairly (TCF) Outcome 6 provides that “*Customers do not face unreasonable post- sale barriers imposed by firms to change product, switch providers, submit a claim or **make a complaint***”

This document not only provides a complaints procedure in conformance with legislative expectations but it also explains the procedure should you wish to complain about any of the financial services rendered by the FSP, and sets out the process which the FSP will follow in order to resolve the complaint.

## 3. OBJECTIVES

- a) To deliver a **consistent, high-quality** and **accountable** response to complaints.
- b) To ensure that our complaints procedure is in line with the overall regulatory requirements and Treating Customers Fairly outcomes and industry ‘best practises’.

## 4. DEFINITIONS

### a) “Complaint”

means an expression of dissatisfaction by a complainant, relating to a product or service provided or offered by the financial services provider, or to an agreement with the financial services provider in respect of its products or services and indicating that -

- i) the financial services provider 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 services provider or to which it subscribes;
- ii) the financial services provider or its service provider’s maladministration or wilful or negligent action or failure to act, has caused the complainant harm, prejudice, distress or substantial inconvenience; or
- iii) the financial services provider or its service provider has treated the complainant unfairly.

and regardless of whether such an expression of dissatisfaction is submitted together with or in relation to a customer query.

### b) “Complainant”

means a person who has submitted a specific complaint to the financial services provider or its service provider and who –

- i) is a customer or prospective customer of the financial services provider concerned and has

- ii) a direct interest in the agreement, product or service to which the complaint relates; or
  - iii) has submitted the complaint on behalf of a person mentioned in (a), provided that a prospective customer will only be regarded as a complainant to the extent that the complaint relates to the prospective customer's dissatisfaction in relation to the application, approach, solicitation or advertising or marketing material contemplated in the definition of "prospective customer".
- c) **"Customer"**  
of a financial services provider means any user, former user or beneficiary of one or more of the financial products or services provided by the financial services provider, and their successors in title.
- d) **"Customer query"**  
means a request to the financial services provider by or on behalf of a customer or prospective customer, for information regarding the financial products, services or related processes, or to carry out a transaction or action in relation to any such product or service.
- e) **"FAIS"**  
means the Financial Advisory and Intermediary Services Act No. 37 of 2002 which was designed to protect customers of financial services providers; regulate the selling and advice-giving activities of FSP (FSPs); ensure that the consumers are provided with adequate information about the financial product they use and about the people and institutions who sell these financial products and establish a properly regulated financial services profession.
- f) **"FAIS Ombud"**  
the FAIS Ombud deals with complaints submitted to the Office by a specific customer against a financial services provider.
- g) **"Financial Services Provider"**  
means Groups Are Us (Pty) Ltd t/a Groups R Us with FSP No 45735 and place of business situated at 34 Newton Street, Newton Park, Gqeberha, 6055.
- h) **"Prospective customer"**  
of a financial services provider means a person who has applied to or otherwise approached the financial services provider in relation to becoming a customer of the financial services provider, or a person who has been solicited by the financial services provider to become a customer or has received marketing or advertising material in relation to the financial institution's products or services.
- i) **"Routine complaints"**  
is where a customer submits an expression of dissatisfaction together with a customer query or relating to a customer query and which further can be resolved internally within a period of 15 days. Routine complaints are therefore customer queries which have been escalated by the customer previously but now the customer has become dissatisfied with the process being followed to resolve the customer query.

j) **“Serious complaints”**

are complaints that contravene regulatory requirements and are likely or may already have caused a customer to suffer financial prejudice.

k) **“Service provider”**

means another person with whom the financial services provider to whose products or services the complaint relates has an arrangement in relation to the marketing, distribution, administration or provision of such products or services, regardless of whether or not such other person is the agent of the financial services provider.

l) **“Resolved”**

in relation to a complaint means that the **complaint has been finalised** in such a manner that the complainant has explicitly accepted that the matter is fully resolved or that it is reasonable for the financial services provider to assume that the complainant has so accepted. A complaint should only be regarded as resolved once any and all undertakings made by the financial services provider to resolve the complaint have been met.

m) **“TCF”**

Treating Customers Fairly is an outcomes based regulatory and supervisory approach designed to ensure that specific, clearly articulated fairness outcomes for financial services customers are delivered by regulated financial service providers (FSPs). FSPs are expected to demonstrate that they deliver the required 6 TCF Outcomes to their customers throughout the product life cycle, from product design and promotion, through advice and servicing, to complaints and claims handling – and throughout the product value chain.

## 5. PROCESS OVERVIEW

The following key steps must be followed for all customer complaints received by the staff of Groups R Us:



The requirement for each step is detailed below.

## 6. PROCESS

### 6.1. HOW TO MAKE A COMPLAINT?

- a) If you as customer or prospective customer has a complaint against the FSP, it must be submitted to us in writing. It can be submitted either by hand, post, or email at the contact details that appear in this document.
- b) If you are unable to submit a written complaint, you may also submit your complaint via calls to our dedicated Call Centre. All calls will be recorded.
- c) We will keep a record of the complaint, and maintain such record for 5 years after resolution/completion of the complaint, as required by legislation.

### 6.2. WHO WILL HANDLE YOUR COMPLAINT?

- a) Once your complaint has been received it will be allocated to and dealt with by adequately trained staff.
- b) The person responsible for your complaint will contact you and provide you with any feedback related to your complaint, or request additional information needed to address your complaint.
- c) The Compliance Officer will have oversight over the complaints allocated to various personnel and you may direct any queries to the complaints manager whose details are recorded in this document.

### 6.3. RECEIVE AND CLASSIFY

- a) We will ensure that all potential issues are captured and classified for escalation, review and action as required.
- b) Any complaint, issue or negative customer interaction must be reduced to writing by being logged and classified for action.
- c) A third party acting on behalf of a complainant must deliver a certified or original consent or power of attorney to act on behalf of a complainant, or must provide verbal consent (on recorded call, if complaint is handled telephonically) for the third party to act on behalf of the complainant. Should such third party fail to deliver a consent or power of attorney, no further dealings will be pursued with such third party until the proper authority is obtained. The complaint will however be taken up directly with the complainant on whose behalf the complaint is made.
- d) All complaints must be formally logged using the manual GRU Complaints Register (Annexure A). The complaints register is uploaded to the relevant insurer monthly. The Complaints Register is maintained and updated by the Compliance Officer on a regular basis.

### 6.4. RISK

All complaints will be prioritised as follows:

- a) Risk 1 - routine complaints, potential low business impact. This requires a response to the customer within 15 working days.
  - Routine complaints have the potential of becoming serious or official complaints should they be disregarded or ignored by a financial services provider.
  - The staff member logging the complaint should review the complaint and its priority with the Complaints Manager before proceeding to the next step.

- The Complaints manager will decide on the appropriate person(s) to carry out subsequent steps, including the investigation
- b) Risk 2 - urgent, serious business impact. This requires a response to the customer within 5-10 working days.
- Serious complaints are complaints logged on media platforms, received from legal advisors or immediately evidence contravention of legislation requirements such as failure to conduct a proper needs analysis.
  - These complaints from the outset may cause reputational harm to a financial services provider and/or may cause financial loss to a customer.
  - These complaints should ideally be handled by the Complaints Manager/Key Individual or suitable senior person delegated to the task by the Complaints Manager/Key Individual.
  - Complaints from third parties and/or legal advisors will be responded to within 24 hours, acknowledging receipt of the complaint and further requesting authority to act on the complainants behalf such as a power of attorney or consent by the complainant to deal with the complaint on the complainant's behalf.
  - No information will be divulged to a third party who does not have the proper authority to act on a complainant's behalf.
- c) Risk 3 - urgent official complaints received from regulators e.g. FAIS Ombud or National Financial Ombud (NFO). The regulator usually stipulates a response time of 30 days from receipt of the complaint.
- Official complaints should be handled by the Complaints Manager/Key Individual.
  - The investigation of the complaint may be delegated to a suitable senior person selected by the Complaints Manager and the required draft response and attachments may be collated by such senior person.
  - The Complaints Manager will be ultimately responsible for compiling the response to the regulator.
  - The response to the Regulator should be made within the stipulated turn-around time.

## 6.5. CATEGORISATION

Note to members: The categories provided below act merely as a guideline for categorisation of complaints for logging on the Complaints Register.

Complaints will be categorised according to whether it's nature, e.g. service, product related, features, performance, advice given etc.

These categories are then narrowed down to its impact on customer. The impact of the complaint is measured by further categorising it according to the following TCF Outcomes:

### 6.5.1. TCF Outcome 2

These are complaints relating to the **design of a product or service**. The categories which affect TCF outcome 2 would be product features and charges.

### 6.5.2. TCF Outcome 3

These complaints relate to unsuitable, or inaccurate, misleading, confusing or unclear **information provided to a customer** throughout the life cycle of a product. This could vary from

advice, product information, information provided in advertising or marketing material about a product or service rendered etc. These disclosures would include the conflict of interest disclosures required by the General Code of Conduct of FAIS (Code); Section 4 and 5 of the Code or any other disclosure requirements in terms of the Code or any other legislation.

#### 6.5.3. TCF Outcome 4

These are complaints which relate to the **advice given (if advice was given)** to a customer by an advisor which was misleading, inappropriate and/or tainted with conflicts of interest which was not disclosed. Inappropriate advice given as a result of lack of knowledge, skill or experience on the part of the advisor of the product or service being rendered, would also be included here. The failure to conduct a needs analysis and to consider the customers financial position, goals or life stage would also amount to a contravention of suitable advice requirements and any complaint in association herewith would fall into this category.

#### 6.5.4. TCF Outcome 5

Complaints in this category pertain to **product performance and service-related issues**. This would include complaints relating to customer's disappointment with limitations in a product or service performance of which they were unaware as well as the inability of a product to meet a customer's expectations. Complaints related to a product supplier's exercise of a right to terminate a product or amend its terms, would also be included in this category.

#### 6.5.5. TCF Outcome 6

These complaints relate to **product accessibility or changes, complaints** relating to complaints handling and complaints relating to claims would be categorised here. If a clients faces an unreasonable barrier to change their product switch providers, submit a claim or submit a complaint, the complaint will fall within this category.

Other categories may be developed which are appropriate to this outcome and will be incorporated into the policy and attached to the Complaints Register (Annexure A).

### 6.6. ACKNOWLEDGE

- a) All complaints must be acknowledged within 24 hours of receipt of the complaint.
- b) Where an acknowledgement is made telephonically, it must be followed by a written response whether by sms or email, as far as it is possible.
- c) The details of the person allocated to the complaint and details of relevant staff able to assist the complainant must be made available to the complainant within 48 hours from receipt of the complaint.

### 6.7. INVESTIGATE

- a) The investigation will be driven by analysing the root cause of the complaint to enable the complaint to be appropriately dealt with and to avoid, if possible, its reoccurrence.
- b) This may require that both internal and external key facts are identified and clarified.
- c) Should a complaint relate to product features or services handled solely by a product supplier, this matter will be escalated and appropriately dealt with in conjunction with the product supplier, ensuring that the matter is resolved to the satisfaction of the complainant.
- d) All areas of interaction and communication will be documented and where

appropriate, consent obtained from the complainant to ensure that no personal information is divulged or processed without the complainant's knowledge or consent.

- e) During the investigation process the complainant will be kept appropriately updated of the progress of the investigation.

#### 6.8. RESOLVE AND CONFIRM

- a) Ensure that the proposed resolution meets Treating Customers Fairly Outcomes, does not prejudice the financial services provider or complainant and does not involve any unnecessary legal or financial implications.
- b) The proposed action will be documented and discussed and agreed upon with the Complaints Manager and/or affected Key Individual and Representative.
- c) The signed off resolution will then be discussed and reviewed with the complainant to ensure fairness and clarity and to further ensure that the resolution deals with the root cause of the complaint.
- d) The review should include recognition and documentation of any underlying issues that have contributed to the complaint and recommendations for actions to prevent further occurrence.

#### 6.9. RESPOND TO CUSTOMER

- a) The details of the findings and proposed resolution should be clearly explained (in written or verbal form as appropriate) to the customer- within the agreed timescales (as stipulated above in clause 6.4).
- b) Where a complaint cannot be addressed within **three weeks** by the financial services provider, it must as soon as reasonably possible after receipt of the complaint send to the complainant a written acknowledgment of the complaint with contact references of the FAIS Ombud or National Financial Ombud (NFO).
- c) If within **six weeks** of receipt of a complaint. Groups Are Us (Pty) Ltd t/a Groups R Us has been unable to resolve the complaint to the satisfaction of a complainant, the complainant may:
  - refer the complaint to the Office of the FAIS Ombud or National Financial Ombud (NFO) if he/she wishes to pursue the matter; and
  - the complainant **MUST** do so within **six months** of receipt of such notification.

#### 6.10. FOLLOW UP AND REVIEW

- a) Complaints should be diarised to ensure it remains within the appropriate turnaround times.
- b) Should a complaint exceed the turn-around time due to unforeseen and reasonable circumstances, the complainant must be kept appropriately informed of the reasons for the delay and a speedy resolve will continuously be sought
- c) A complainant will be kept appropriately informed throughout the complaints process of the resolution being sought.
- d) Upon resolution of the complaint, the allocated person handling the complaint must obtain whether the customer was satisfied with the complaints handling process and the resolution sought and whether the resolution was proper and fair.
- e) Any negative responses from complainants must be handled accordingly.

#### 6.11. QUALITY ASSURANCE AND CHECKS

- a) The Complaints Manager will ensure that all employees of Groups Are Us (Pty) Ltd t/a Groups R Us have access to this Complaints Process Framework.
- b) Customers will be made aware of the Complaints Process Framework and will have access to the manual upon request.
- c) All complaints will be reviewed monthly and would be further utilised as TCF Management Information utilised to improve overall TCF outcomes.
- d) All complaints will be actioned with the aim of preventing reoccurrence, where feasible.

#### 7. IMPORTANT CONTACT DETAILS

| Groups Are Us (Pty) Ltd t/a Groups R Us |                                                                                                                                             |
|-----------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| Telephone:                              | 086 127 3342                                                                                                                                |
| Email:                                  | <a href="mailto:info@groupsrus.co.za">info@groupsrus.co.za</a> / <a href="mailto:compliance@groupsrus.co.za">compliance@groupsrus.co.za</a> |
| Website:                                | <a href="http://www.groupsrus.co.za">www.groupsrus.co.za</a>                                                                                |
| Physical Address:                       | 34 Newton Street,<br>Newton Park,<br>Gqeberha,<br>6055                                                                                      |

| FAIS Ombudsman    |                                                                                                |
|-------------------|------------------------------------------------------------------------------------------------|
| Telephone:        | 012 762 5000                                                                                   |
| Sharecall:        | 086 066 3274                                                                                   |
| Email:            | <a href="mailto:info@faisombud.co.za">info@faisombud.co.za</a>                                 |
| Website:          | <a href="http://www.faisombud.co.za">www.faisombud.co.za</a>                                   |
| Physical Address: | Menlyn Central Office Building,<br>125 Dallas Avenue,<br>Waterkloof Glen,<br>Pretoria,<br>0010 |
| Postal Address:   | PO Box 41,<br>Menlyn Park,<br>0063                                                             |

| National Financial Ombudsman (NFO) |                                                        |
|------------------------------------|--------------------------------------------------------|
| Telephone:                         | 086 080 0900                                           |
| Whatsapp:                          | +27 66 473 0157                                        |
| Email:                             | <a href="mailto:info@nfosa.co.za">info@nfosa.co.za</a> |
| Physical Address 1:                | 110 Oxford Road,<br>Houghton Estate,<br>Johannesburg,  |

|                     |                                                                                                            |
|---------------------|------------------------------------------------------------------------------------------------------------|
|                     | Gauteng,<br>2198                                                                                           |
| Physical Address 2: | 6 <sup>th</sup> Floor, Claremont Central Building,<br>6 Vineyard Road,<br>Claremont,<br>Cape Town,<br>7700 |

| <b>Registrar of Long-Term Insurance</b> |                                                                                                                 |
|-----------------------------------------|-----------------------------------------------------------------------------------------------------------------|
| Telephone:                              | 012 428 8000 / 080 020 2087                                                                                     |
| Fax:                                    | 012 346 6941                                                                                                    |
| Email:                                  | <a href="mailto:info@fsca.co.za">info@fsca.co.za</a>                                                            |
| Website:                                | <a href="http://www.fsca.co.za">www.fsca.co.za</a>                                                              |
| Physical Address:                       | Riverwalk Office Park, Block B,<br>41 Matroosberg Road,<br>Ashlea Gardens,<br>Extension 6,<br>Pretoria,<br>0081 |
| Postal Address:                         | PO Box 35655,<br>Menlo Park,<br>0102                                                                            |

## 8.1. ANNEXURE A

## Instructions

| No. | Priority | Complaint Ref No | Customer Name | Customer Address | Financial Advisor | Complaints Administrator | Date received<br>(NS_yyyy/mm/dd) | Date Acknowledged<br>(NS_yyyy/mm/dd) | Product Supplier          | Product Type      |
|-----|----------|------------------|---------------|------------------|-------------------|--------------------------|----------------------------------|--------------------------------------|---------------------------|-------------------|
|     |          |                  |               |                  |                   |                          |                                  |                                      | Sanlam Developing Markets |                   |
|     |          |                  |               |                  |                   |                          |                                  |                                      | Sanlam Developing Markets |                   |
|     |          |                  |               |                  |                   |                          |                                  |                                      | Sanlam Developing Market  | Funeral Insurance |
|     |          |                  |               |                  |                   |                          |                                  |                                      | Sanlam Developing Markets |                   |
|     |          |                  |               |                  |                   |                          |                                  |                                      | Sanlam Developing Market  | Funeral Insurance |

| Complaint Category  | TCF Outcome to be addressed | Brief detail of complaint | Complaint Accepted - Yes Rejected - No | Complaint Resolved | Resolution Date (NB: yyyy/mm/dd) | T/A Time | Past Due | Past due date | Action taken if complaint is accepted or Reason for rejected claim | Client satisfied | Proof of client satisfaction received |
|---------------------|-----------------------------|---------------------------|----------------------------------------|--------------------|----------------------------------|----------|----------|---------------|--------------------------------------------------------------------|------------------|---------------------------------------|
| Product Performance | TCF Outcome 5               |                           |                                        |                    |                                  |          | #VALUE!  | 0             |                                                                    |                  |                                       |
| Advice              | TCF Outcome 4               |                           |                                        |                    |                                  |          | #VALUE!  | 0             |                                                                    |                  |                                       |
| Advice              | TCF Outcome 4               |                           |                                        |                    |                                  |          | #VALUE!  |               |                                                                    |                  |                                       |
| Other complaints    | TCF Outcome 1               |                           |                                        |                    |                                  |          | #VALUE!  | 0             |                                                                    |                  |                                       |
| Advice              | TCF Outcome 4               |                           |                                        |                    |                                  |          | #VALUE!  | 0             |                                                                    |                  |                                       |
| Advice              | TCF Outcome 4               |                           |                                        |                    |                                  |          | #VALUE!  | 0             |                                                                    |                  |                                       |
|                     |                             |                           |                                        |                    |                                  |          | #VALUE!  | 0             |                                                                    |                  |                                       |
| Advice              | TCF Outcome 4               |                           |                                        |                    |                                  |          | #VALUE!  | 0             |                                                                    |                  |                                       |

[illegible]