

COMPLAINTS MANAGEMENT FRAMEWORK MUA INSURANCE ACCEPTANCES (PTY) LTD

The Complaints management framework created in line with the requirements of the Financial Advisory and Intermediary Services Act 37 of 2002 (FAIS) General Code of Conduct for Authorised Financial Services Providers and Representatives as well as the Policyholder Protection Rules ('PPR') under the Short-Term Insurance Act 53 of 1988. The framework is established to ensure the fair treatment of customers and serves to provide guidance around the recording and handling of complaints with a view to continuously improve MUA's service delivery and to ensure compliance with regulatory requirements.

The establishment and maintenance of the Complaints management framework provides for reasonable complaints management procedures enabling complaints to be effectively considered by following all reasonable steps to gather and investigate relevant and appropriate information regarding the circumstances of the complaint with due regard to the fair treatment of the customer.

A complaint can be laid by a:

- policyholder or the policyholder's successor in title;
- person that pays a premium in respect of a policy;
- potential policyholder whose dissatisfaction relates to the relevant application, approach, solicitation or advertising or marketing material;
- who has a direct interest in the agreement, policy or service to which the complaint relates, or a person acting on behalf of a person referred to in paragraphs.

FAIS Complaint

This is a specific complaint relating to a financial service rendered by a financial services provider or representative to the complainant and in which complaint it is alleged that the provider or representative:

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

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CAPE TOWN

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Corner of Bill Bezuidenhout & Sportica Streets,
Tygervalley, 7530
PO Box 5777, Tygervalley, 7536

DURBAN

1st Floor Units 5 & 6, Aloe Block,
Fairway Green, 3 Abrey Road, Kloof, 3610
PO Box 591, Gillitts, 3603

JOHANNESBURG

Ground Floor, Unit 2, Bruton Office Park,
18 Bruton Road, Bryanston, 2021
PO Box 131152, Bryanston, 2191

MUA Insurance Acceptances (Pty) Ltd (Registration number 2008/011925/07) is an authorised Financial Services Provider (FSP No.: 37947) underwriting on behalf of **Auto & General Insurance Company Limited** (Registration number 1973/016880/06), an authorised Financial Services Provider (FSP No.: 16354)

DIRECTORS DJ Loots (managing) VJ Hayter T Muranda R Farrell

PPR Complaint

This is an expression of dissatisfaction by a complainant to an insurer or, to the knowledge of the insurer, to the insurer's service provider relating to a policy, or service provided or offered by that insurer which indicates or alleges, regardless of whether such an expression or dissatisfaction is submitted together with or in relation to a policy holder query, that:

- the insurer 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 insurer or to which it subscribes;
- the insurer or its service provider's maladministration or wilful or negligent action or failure to act, has caused the person harm, prejudice; distress or substantial inconvenience; or
- the insurer or its service provider has treated the person unfairly.

MUA's board of Directors are responsible for effective complaints management and approve and oversee the effectiveness of the implementation of the complaints management framework adopted by MUA. At an operational level, all staff responsible for making decisions and recommendations in respect to complaints are:

- adequately trained on all internal processes as well as industry processes including Ombudsman engagement;
- adequately experienced, knowledgeable and skilled in complaints handling and possess all the legal and regulatory reference in complaints management;
- aware of instances that could bring light any conflict of interest situation and how this should be avoided or mitigated, and;
- are impartial at all times when making decisions and recommendations.

The complaints resolution procedure is designed to:

- deal with complaints in a timely and fair manner giving effect to the fair customer outcomes;
- provide complainants access to MUA's complaints resolution process via the channels outlined below;
- ensure transparency, accessibility and visibility, providing complainants with full knowledge of complaints procedures and
- establish an internal complaints escalation process and facilitate improvement of service to avoid repeat occurrences giving rise to complaints.

1. Complaint has to be in writing

All complaints must be submitted in writing together with any supporting documents.

2. Complaint areas:

For efficient resolution of complaints, please direct your complaint as applicable:

2.1. Client Services Department

If your complaint relates to service, underwriting or a claim:

Fax: 021 525 6300

email complaints@mua.co.za

2.2. Compliance Department

If your complaint relates to a contravention of any regulatory or statutory requirement regarding the rendering of a financial service:

Fax: 0860 99 99 54

email: compliance@telesure.co.za

3. Procedure for the Internal Resolution of Complaints

The following is a step-by-step guideline of how a complaint will be dealt with, once received by MUA:

- 3.1. On receipt, a complaint will be entered into a central complaints register and a confirmation of receipt thereof will be forwarded to the complainant within 2 (TWO) working days.
- 3.2. Once entered into the central complaints register the complaint is directed to the appropriate department, where it will be allocated to a skilled person specialising in the relevant type of complaint.
- 3.3. The complainant will be informed of the contact details of the person handling the complaint, timeline for addressing the complaint, the internal complaints escalation and review process and details of the Ombud if the complainant is not satisfied with the outcome of the complaint.
- 3.4. The complaint will be investigated and where applicable additional information will be requested and a turnaround timeline will be provided.
- 3.5. In the event that additional information is not required, feedback with findings in writing will be provided to the complainant within 10 (TEN) working days, depending on the complexity of the matter.
- 3.6. Should it not be possible to provide a response within the period aforementioned, the complainant will be advised on the developments and or progress regarding the complaint.
- 3.7. If the complainant is aggrieved with the findings, the complaint will be escalated to the relevant department head and / or to Auto and General (A&G) for consideration where applicable
- 3.8. If the complainant is aggrieved by the final internal findings, the complainant may approach the Ombud.
- 3.9. Should the complaint not be resolved within 30 (THIRTY) working days from receipt of the complaint the relevant Ombud should be approached:

- (A) **The Ombudsman for Short-term Insurance-** provides consumers with a free dispute resolution mechanism. It mediates between subscribing members such as the insurer and policyholders regarding insurance contracts.

The Ombudsman for Short-Term Insurance can be contacted at:

Tel. 011 726-8900 Fax. 011 726-5501 Sharecall: 0860 726 890 E-mail. info@osti.co.za

Postal Address P O Box 32334 Braamfontein, 2017

- (B) **The FAIS Ombudsman** is an independent and impartial dispute resolution tribunal which investigates, considers and disposes of complaints by consumers against Financial Services Providers. For example, the way a policy was sold or how a service was provided.

The FAIS Ombudsman can be contacted at:

0860FAISOM (0860324766)

Tel: 012 470 9080 Fax: 012 348 3447 E-mail address: info@faisombud.co.za

Website: www.faisombud.co.za Postal address: P.O Box 74571 Lynnwood Ridge 0040

MUA shall maintain record of all complaints received which include at a minimum; details of the complainant and reasons for the complaint, complaint category, copies of evidence, correspondence and decisions and progress updates on complaints which will demonstrate adherence with timelines. The record keeping of complaints is designed to ensure that MUA is in a position to provide Auto and General with sufficient detail to report complaints information to the relevant designated authority or to the public as may be required by the Commissioner Records of complaints will be kept for a period of five years after termination of the policy.

All complaints are categorised in line with the various TCF outcomes:

- Outcome 2: Complaints relating to the design of a product or service
- Outcome 3: Complaints relating to information provided
- Outcome 4: Complaints relating to advice
- Outcome 5: Complaints relating to product performance
- Outcome 5(b) Complaints relating to customer service
- Outcome 6(a) Complaints relating to product accessibility, changes or switches
- Outcome 6(b) Complaints relating to complaints handling
- Outcome 6(c) Complaints relating to insurance risk claims
- Outcome 6(d) Complaints relating to non-payment of claims
- Other complaints

The categorisation of complaints enables MUA to analyse complaints received on an ongoing basis ensuring that information is translated into meaningful data which contributes to improved customer outcomes and improvement in complaints handling.

MUA shall maintain the following data in relation to reportable complaints on an ongoing basis:

- number of complaints received;
- number of complaints upheld;
- number of rejected complaints and reasons for the rejection;
- number of complaints escalated by complainants to the internal complaints escalation process;
- number of complaints referred to an ombud and their outcome;
- number and amounts of compensation payments made;
- number and amounts of goodwill payments made; and
- total number of complaints outstanding.



MUA in conjunction with Auto and General (Pty) Ltd maintain effective and transparent relationships with the FAIS and Short term Insurance Ombudsman. Processes are embedded in the complaints management process to facilitate open engagement with the Ombudsman in relation to complaints. This includes communication of the Ombudsman details to the customer for escalation of complaints as well as effective communication with the Ombudsman on the management of escalated complaints.

This complaints management framework shall be reviewed annually.