

## THE UNLIMITED GROUP (PTY) LIMITED- COMPLAINT POLICY

### 1. INTRODUCTION

All licensed financial service providers (FSP's) are required to have systems in place for the purpose of timeous and efficient resolution of complaints within the specified timeframes.

As part of our overall approach we are fully committed to treating our policyholders fairly. We endeavour to deliver fair outcomes to our policyholders and take responsibility for our company representatives. We further recognise that our employees, irrespective of their role, are critical in delivering a positive customer experience and ensuring that our policyholders are treated fairly. Our culture and values encourage and support our employees in this undertaking.

### 2. DEFINITIONS

#### ▪ **Complaint**

Complaint means a specific complaint relating to a financial service rendered by the FSP or representative or agent to the complainant on or after the date of commencement of the FAIS Act, and in which complaint it is alleged that the FSP or Representative or agent:

- *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*
- *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*

#### ▪ **Complainant**

A complainant means a specific customer who submits a complaint to the FSP for purposes of resolution by the FSP.

### 3. COMPLAINTS POLICY

In recognition of our obligations under the FAIS Act, the Consumer Protection Act and the Treating Customers Fairly Outcomes, The Unlimited is committed to the following in respect

of dealing with complaints:

- To ensure the adequate protection of policyholders.
- To ensure the complainant is treated fairly in the assessment of complaints.
- To ensure that all complaints are recorded in a Complaints Register.
- To ensure that the complaints data is analysed in order to identify and address any recurring or systemic problems and potential and operational risks, by:
  - Analysing the causes of individual complaints so as to identify root causes common to the different types of complaints;
  - Considering whether such root causes may also affect other processes or products, including those not directly complained of; and
  - Correcting, where reasonable to do so, such root causes.
- To resolve the complainant's complaint in a timely and fair manner.
- To resolve the complaint in a manner that is objectively reasonable towards the complainant, the business and its personnel.
- To avoid conflicts of interest between the complainant and the company, its employees and its representatives.
- To ensure that the complainant knows the complaints policy and procedure that is followed.
- To provide an outcome in writing.
- To be transparent at all times and to keep the complainant informed of resolution procedures.
- To ensure the complainant has access to the complaints procedure.
- If the complaint is not resolved the complainant will be advised of further steps available (i.e. the OSTI, FAIS Ombud).

#### **4. COMPLAINTS SUPPORT**

In order to achieve the abovementioned objectives, The Unlimited will, at all times, ensure that the following is in place:

- Enough manpower and resources are available to facilitate an effective and fair resolution process.
- Complaints must be lodged in writing by the complainant and such records of the complaint must be retained for 5 years. The outcome of the complaints will be retained for 5 years as well. There will be adequate storage facilities in place to adhere to this

requirement.

- Staff dealing with complaints must have adequate training and expertise.
- If any complaint is resolved in favour of a complainant, the redress will take place without any delay.
- There must be an internal follow-up procedure to avoid recurrences of complaints.

## **5. COMPLAINTS PROCEDURE**

In line with achieving the Treating Customers Fairly Outcomes, the following underpins our complaints procedure:

- On request, written information regarding the complaints-handling process is provided.
- The following information will be provided to the complainant in a clear and up-to-date manner:
  - type of information to be provided by the complainant;
  - identity and contact details of the person or department to whom the complaint should be directed;
  - the process that will be followed when handling a complaint;
  - estimated timelines;
  - the availability of an ombudsman or alternative dispute resolution (ADR) mechanism;
  - further handling of the complaint.

### **We deal with complaints as follows:**

- Our internal complaints resolution process is intended to provide fair and effective resolution of complaints. The time periods set-out in this procedure will be adhered to as strictly as possible but may be varied if necessary. The following step-by-step guideline sets out the procedures we will adopt and shows how a complaint will be dealt with, once received by us:
  - The date and contents of the complaint is logged in the Complaints Register.
  - All complaints should be submitted in writing to:
    - Email : [info@theunlimited.co.za](mailto:info@theunlimited.co.za)
    - Postal Address : Private Bag X7028, Hillcrest, 3650
    - Physical Address : 1 Lucas Drive, Hillcrest, 3650

All supporting documents must be attached to the complaint to enable us to attend to concerns timeously.

- Should the complainant not have access to the Internet or Electronic Mail facilities; the below contact number should be used:
- Telephone : 0861 99 0000
- We will acknowledge receipt of the complaint in writing within **24 hours** of receipt, and give the complainant the name(s) and contact details of the person / department responsible for the resolution of the complaint. The complaint is assigned accordingly.
- We will Investigate, evaluate and assess the complaint to ascertain whether the complaint can be resolved immediately. If the complaint can be resolved immediately, we take the necessary action and advise the complainant accordingly.
- The standard time frame in our Customer Care department for the resolution of complaints is 7 to 14 working days. (Where a thorough investigation will be conducted including listening to the sales call or any other telephonic customer interactions through to calculating any refunds due). Where we are unable to resolve a complaint within **7 to 14 working days** due to more complicated circumstances; feedback will be provided to the complainant within **21 working days** of the date of receipt of the initial complaint – provided that we received all information required and/or our investigation has been completed. We will keep the complainant informed of our progress at least every **10 working days**.
- Once we have resolved the complaint, the complainant will be contacted telephonically and advised thereof. In addition, we will follow up in writing in order to provide written reasons of the outcome.

Where a complaint is resolved in the complainants favour, we will ensure that a full and appropriate level of redress / corrective action is offered to the policyholder without delay.

- Should the outcome of the complaint not be in the complainants favour then the complainant has the right to request us to have the matter reviewed by an alternative representative of the company.
  - We will treat such requests as a dispute;

- We will provide the complainant with the Name and Contact Details of the company representative that will be tasked to facilitate the dispute resolution process;
  - When a decision has been reached; the complainant will be provided with written feedback of such decision and reasons for same.
  - The time frames as stated above will apply in this regard.
- Should the outcome of the dispute resolution not be in the complainants favour then the complainant has the right to request the insurer to review any insurance related matters:

Insurance benefits underwritten by **SANTAM STRUCTURED INSURANCE LIMITED**

- Email : SSL.complaints@santam.co.za
- Tel : (011) 784-9858
- Postal Address : PO Box 659652, Benmore, 2010
- Physical Address : 7th Floor, Alice Lane Building 3, Corner Alice Lane and 5th Street, Sandton, 2196

Insurance benefits underwritten by **CENTRIQ**

- Email : info@centriq.co.za
- Tel : 011 268 6490
- Postal Address : PO Box 55674, Northlands, 2116
- Physical Address : The Oval, 2nd Floor, West Wing, Wanderers Office Park, 52 Corlett Drive, Illovo, 2196

We encourage complainants to approach us with their concerns before escalating a complaint to the insurer/s and/or relevant external dispute resolution entity.

However, should the complainant not be satisfied with the outcome of our dispute resolution, then the complainant has the right to have such a decision / process reviewed by an independent entity, being:

**THE OMBUDSMAN FOR LONG TERM INSURANCE ('OLTI')**

Postal Address : Private Bag X45  
Claremont, Cape Town  
7735

Fax number : (021) 674 0951  
Telephone number : (021) 657 5000  
Share call number : 0860 726 890  
E-mail Address : info@ombud.co.za  
Website : www.ombud.co.za

Click on the link provided for easy electronic submission of a complaint to the OLTi:  
<http://www.ombud.co.za/complaints/submit-a-complaint>

### **THE FAIS OMBUDSMAN**

If the complaint relates to advice as contemplated in the Financial Advisory and Intermediary Services Act, 37 of 2002 as amended, the complainant may submit a complaint to the Financial Advisory and Intermediary Services (FAIS) Ombud at:

Postal Address : P. O. Box 74571  
Lynnwood Ridge  
0040  
Physical Address : Eastwood Office Park, Baobab House,  
Ground Floor, Corner Lynnwood Road  
and Jacobson Drive, Lynnwood Ridge,  
0081  
Telephone number : (012) 470-9080 / (012) 762 5000  
Fax number : (012) 348-3447  
E-mail Address : info@faisombud.co.za  
Website : www.faisombud.co.za

Click on the link provided for easy electronic access to the required form/s to be completed:  
<http://www.faisombud.co.za/howtocomplain>

### **THE REGISTRAR OF LONG TERM INSURANCE**

Telephone : (012) 428-8000  
Fax: : (012) 422-2979  
Website : [www.fsb.co.za](http://www.fsb.co.za)

**THE REGISTRAR OF SHORT TERM INSURANCE**

Telephone : (011) 726 8900  
Fax: : (012) 726 5501  
Website : [info@osti.co.za](mailto:info@osti.co.za)

- The complainant will be advised of their right to seek legal redress as well as having 6 months from receipt of notification to refer the matter to the Ombud.
- The relevant register is updated with all developments.