RODEL RISK SOLUTIONS (PTY) LTD
Reg. No.: 2018/388129/07
FSP No.: 49974

Complaints Policy & Resolution

Contents

Complaints Policy & Resolution

1. INTRODUCTION

Rodel Risk Solutions FSP 49974 (Rodel Risk) takes any compliant seriously and this compliant policy formalises the procedures required to properly handle and effectively resolve any complaint received.

The policy also ensures that we understand the root cause of a complaint, which will assist us with improving our policies and procedures to reduce complaints in the future.

2. DEFINITIONS

Client: person or group of people, policyholder or potential policyholder.

Policyholder query: is a request to Rodel Risk or an insurer by client for information regarding the insurer's policies, services or related processes. It can also refer to a request to carry out a transaction or action in relation to a policy or service.

Complainant refers to a person who submits a complaint:

1. Policyholder or a policyholder's successor in title
2. Beneficiary or the beneficiary's successor in title
3. A person that pays a premium in respect of a policy
4. A potential policyholder

Complaint is the expression of dissatisfaction by a client to Rodel Risk or an insurer in respect of its products or services that:

1. Failed to comply with an agreement, code of conduct, rule or law
2. Caused the complainant harm, prejudice, distress or substantial inconvenience
3. Treat the complainant unfairly

Reportable complaint is a complaint other any of the following:

1. An Upheld immediately complaint by the person who initially received the complaint
2. Upheld within the company's ordinary process for handling customer queries in relation to the type of agreement, product or service complained about only if that process does not take more than fifteen business days to be completed from the date the complaint is received
3. Brought to the attention of the company where the company does not have reasonable opportunity to record the details of the complaint as may be prescribed in relation to reportable complaints

Upheld means that a complaint has been finalised, either fully or partially, in favour of the complainant

1. The complainant has accepted that the matter and has been resolved in full;
2. It is reasonable for Rodel Risk to assume that the complaints has been accepted;
3. All steps taken by Rodel Risk to resolve the complaint have been met, and/ or the complainant has indicated their satisfaction with any arrangements to ensure such steps will be met by the company within an acceptable time to the complainant.

Complaints Policy & Resolution

Rejected with regard to a complaint, means that the complaint has not been upheld and Rodel Risk regards the complaint as finalised after advising the complainant that it does not intend to take any further steps to resolve the complaint including complaints regarded by Rodel Risk as unjustified or invalid, or where the complainant does not accept or respond to the company's proposals to resolve the complaint.

Compensation payment is a payment whether monetary or in the form of a benefit or service by or on behalf of Rodel Risk to a complainant to compensate the complainant for a proven financial loss incurred as a result of Rodel Risk's contravention, non-compliance, action, failure to act or unfair treatment resulting in the reason for the complaint. This excludes any loss concerning:

1. Goodwill payment
2. Payment contractually due to the complainant in terms of a policy
3. Refund of an amount paid by or on behalf of the complainant to the company where such payment was not contractually due.
4. This includes any interest on late payment in 1 or 2 above.

Goodwill payment refers to a payment whether monetary or in the form of a benefit or service by or on behalf of the company as an expression of goodwill aimed at resolving the complainant where Rodel Risk does not accept liability for any financial loss to the complainant as a result of the matter complained about.

3. OBJECTIVES

Rodel Risk undertakes to manage an effective complaints management system that can:

1. Ensure we treat our clients fairly.
2. A complaint is properly assigned with defined time frames for response and resolution.
3. Report and analyse complaint data to identify trends relevant to complaints.
4. Efficiently resolve complaints in appropriate turnaround times.
5. Manage our complaints effectively.
6. Will identify Rodel Risk as a company that takes the needs of their clients seriously and continually strive for service excellence.
7. Allows for analysis reporting to the regulator.

Complaints Policy & Resolution

4. RECORD KEEPING, MONITORING AND ANALYSIS OF COMPLAINTS

1. All documentation received with regards to a complaint will be saved for a period of five years.
2. All reportable complaints are recorded in a complaints management system and are appropriately assigned for resolution.
3. Information relating to the complaint is recorded in the complaints management system which includes voice recordings, e-mails and other supporting documentation relevant to the complaint.
4. Each complaint received will have an allocated file name which will be reflected on all complaints responses.
5. All complaints recorded will be centralised for:
   - Easy and effective reporting
   - Handling & follow up
   - Conclusion & reporting
   - Identification of complaint causes & the development of corrective measures to policies and procedures.
   - Analysis of complaints and the reporting thereof to the regulators

5. COMPLAINT CATEGORIES

1. Policy design or service
2. Information provided to policyholders
3. Advice
4. Service to policyholders
5. Policy accessibility (ability to make changes, or switches)
6. Complaints handling
7. Claims and non-payment of claims

Complaints Policy & Resolution

6. COMPLAINTS MANAGEMENT PROCESS

INITIAL COMPLAINT

- Rodel Risk receives notification of the complaint.
- If the complaint received is a reportable complaint it is registered in the complaints management system, and a file name is allocated.
- The complaint is reported to Key Individual and Managing Director
- The Managing Director will contact the client and acknowledge the complaint within 24 hours of receiving the complaint and advise the client of the process that will be followed with regard to the complaint.
- An investigation is undertaken to resolve the complaint.
- Complaints need to be resolved within 4 weeks of receiving the complaint.
- Any delays experienced need to be communicated regularly with the complainant to ensure the complainant is aware of the complaint status, and actions being taken in order to resolve the complaint.
- Once the investigation is completed the Managing Director will contact the client by telephone or mail in the event that the complaint is easily resolved.
- The complaints management system is updated with regard to the status of the complaint and the outcome thereof.

COMPLAINT ESCALATION

- In the event that the complainant is not satisfied with the outcome of the complaint, they may request that the complaint be escalated to the independent arbitrator.
- The Managing Director will provide all the information regarding the complaint, the outcome as well as the reason for the decision in writing for further escalation to an independent arbitrator within 3 working days of receiving the clients request to escalate the complaint to the independent arbitrator.
- The independent arbitrator will confirm the receipt of the complaint received for arbitration with Rodel Risk Solutions as well as the client within 2 working days of receiving the complaint.
- The status of the complaint will be updated in the complaints management system.
- The independent arbitrator will investigate the complaint, evidence provided as well as the written communication received by the client.
- Any delays experienced in resolving the complaint will be communicated regularly with the complainant to ensure the complainant is aware of the complaint’s status, and actions being taken in order to resolve the complaint.
- The independent arbitrator will take reasonable steps to keep Rodel Risk Solutions informed as to the progress relating to the complaint as well as their communication with the client in so ensuring that Rodel Risk Solutions is aware that the complaint is still in the process of being resolved.
- The independent arbitrator will respond to the complainant advising the complainant as to the outcome of the complaint, including the reasons for the decision made. The complainant will additionally be provided with the contact details for the relevant ombudsman’s office for further escalation.
- The outcome provided to the complainant by the independent arbitrator will be communicated to Rodel Risk Solutions.
- The status of the complaint will be updated in the complaints management system in line with the outcome provided by the independent arbitrator.

Complaints Policy & Resolution

- The independent arbitrator has the authority to override previous decisions with regard to the complaint.
- The independent arbitrator's response will be provided formally in writing and will provide the following information irrespective of the decision or outcome of the complaint concerned:
  - (a) Contact details of the relevant ombudsman's office.
  - (b) The response from the insurer's compliance manager including the details for decision made relevant to the complaint.
  - (c) The decision made by the independent arbitrator and reasons for the decision made.

COMPLAINT RESPONSE REQUIREMENTS
All complaint responses provided by Rodel Risk Solutions or the independent arbitrator to the complainant must ensure the following:

(a) Communication to the complainant that is clear and straight forward.
(b) Objectivity and not subject to a conflict of interest.
(c) Strict adherence to the required established time frames for responses
(d) Treating the Customer Fairly must be applicable at all times.
(e) Feedback needs to be provided regularly to complainant during the entire process of the complaint resolution.

7. RESOLUTION TIME FRAMES

Registering a complaint
All complaints received irrespective of the format the complaint has been received in must be registered within the complaints management framework within 24 hours of receipt.

Acknowledging a complaint
Registered complaints need to be acknowledged with the complainant within 24 hours of registering the complaint. The acknowledgement of the complaint can be done by e-mail or by telephone.

Complaint investigation & resolution
All complaints need to be resolved within 4 weeks of receipt of the complaint from the complainant. Should there be any delay in resolving a complaint Rodel Risk Solutions will communicate with the complainant advising them of the delay, and the reason for the delay being experienced.

Social media complaints that have been resolved will be communicated by Managing Director, who will post the response with regard to the complaint.

8. DECISIONS RELATING TO COMPLAINTS

In the event of a complaint being upheld, any commitment provided by Rodel Risk Solutions to make a compensation, or any such action the action will be carried out without delay and within a time frame agreed upon with the complainant