



COMPLAINTS RESOLUTION
POLICY AND PROCEDURE

for

NATSURE (Pty) Ltd

BACKGROUND AND PURPOSE OF THIS DOCUMENT:

The Financial Services Conduct Authority (FSCA) and Natsure regards complaints as a very important source of management information that would reveal where customers are experiencing poor customer outcomes. The fair treatment of customers and how to achieve them have now been embedded in our regulatory framework through amendments to the Policyholder Protection Rules (PPR's), Rule 18 of the Long Term and Short Term PPR's specifically. We have embedded these rules in our Complaints Management approach as well as our Complaints Policy.

Natsure is a licensed Financial Service Provider (FSP: 4578 & 50704) with the authority to provide financial advice and intermediary services in terms of the Financial Advisory and Intermediary Services Act, 37 of 2002. ("FAIS"). The formal Complaints Resolution Policy and Procedure is set out below to assist you in the event of a Complaint.

DEFINITIONS AND TERMINOLOGY:

- Definition of a complainant: Complainant – is a person/ someone acting on their behalf, who has a direct interest in the agreement, policy or service, and includes a:
 - policyholder or their successor in title;
 - beneficiary or their successor in title;
 - person that pays a premium;
 - member of a group scheme or; and
 - potential policyholder or potential member of a group scheme - whose dissatisfaction relates to the relevant application, approach, solicitation, advertising or marketing material.
- Complaint: an expression of dissatisfaction to an insurer / their service provider (to the knowledge of the insurer) relating to a policy or service which indicates / alleges, that:
 - The insurer or their service provider failed to comply with an agreement, a law, a rule, or a code of conduct;
 - The insurer or their service provider's maladministration or wilful / negligent action or omission, caused the person harm, prejudice, distress or substantial inconvenience;
 - the insurer or its service provider has treated the person unfairly;
 - regardless whether submitted together with or in relation to a policyholder query.
- Rejected: means that a complaint was not upheld – Insurer regards the complaint as finalised after advising the complainant that it does not intend to take any further action to resolve the complaint – Incl. complaints regarded as unjustified or invalid / where the complainant does not accept or respond to proposals to resolve the complaint.
- Compensation payment: to compensate a complainant for a proven or estimated financial loss incurred as a result of the insurer's wrongdoing - insurer accepts liability for having caused the loss concerned – excluding:
 - goodwill payment;
 - payment contractually due in terms of a policy; or
 - refund of an amount which was not contractually due.
- Goodwill payment: a payment (monetary or in the form of a benefit or service as an expression of goodwill aimed at resolving a complaint, where the insurer does not accept liability for any financial loss to the complainant.
- Reportable complaint: any complaint (as per the definition above) unless:
 - upheld immediately by the person who initially received the complaint;

- upheld within the insurer's ordinary processes for handling policyholder queries, provided that such process does not take more than five business days from the date the complaint is received; or
- submitted to or brought to the attention of the insurer in such a manner that the insurer does not have a reasonable opportunity to record such details of the complaint.
- Upheld: that a complaint has been finalised wholly or partially in favour of the complainant and:
 - the complainant has explicitly accepted that the matter is fully resolved; or
 - it is reasonable for the insurer to assume that the complainant has so accepted; and
 - all undertakings made by the insurer to resolve the complaint have been met or the complainant has explicitly indicated its satisfaction with any arrangements.

This does not necessarily conclude that every act or omission of Natsure / the Underwriting Manager / the Broker as an intermediary or representative may give rise to a complaint in terms of the Act. Contraventions in terms of the Act or in terms of any service that we perform must be wilfully or negligence or cause financial loss or prejudice to a client.

OUR COMMITMENT TO YOU:

- Our Complaints Policy and Procedures will be made available to you on request.
- We will attend to, and resolve any complaint timeously and fairly.
- All relevant staff will be trained with regard to the resolution of complaints in accordance with the relevant provisions of FAIS.
- Records of all complaints will be kept for a minimum period of 5 years. Please note that this is a statutory recordkeeping requirement in terms of FAIS, and as such, all your personal information (as per the Protection of Personal Information Act – POPI) submitted will similarly be held for this period. The information will be made available to/processed by our staff where required, as well as our compliance practice for audit purposes, the Regulator (FSB) and any Ombud who has jurisdiction. It is our business practice to retain records indefinitely so that we can identify possible trends and avoid similar complaints going forward, therefore we will keep this information in accordance with our internal policies.
- Corrective measure will be taken to ensure that problems and shortcomings identified will not happen again.

OBLIGATIONS OF OUR REPRESENTATIVES:

- Our Representatives must adhere to the requirements of FAIS at all times; and
- Our Representatives must ensure that all complaints received are forwarded to the Natsure Compliance Officer.

PROCEDURE WHEN SUBMITTING A COMPLAINT:

A Complaint Lodgment Form is available on the Natsure website: www.natsure.co.za or you may telephonically contact Natsure to lodge a complaint as per the contact details stipulated on page 5 of this document.

The completed form can be tendered by means of mail, fax or electronically to the addresses provided at the end of this document.

The following information must be provided in order for us to assist:

- Your name, surname and contact details;
- A complete description of your complaint;
- Date the event occurred;
- The name of the person who provided you with the financial service;
- The date on which the event occurred;
- All documentation relating to your complaint; and
- Method of preferred communication.

PROCEDURE WHEN WE HAVE RECEIVED YOUR COMPLAINT:

When we receive your complaint, we will:

- Acknowledge receipt, in writing, within 48 HOURS and add your complaint to our internal complaints register.
- Your complaint will be allocated to an appropriate person for further investigation.
- We may ask for additional information if needed.
- We will investigate, attempt to resolve and respond within 15 days of receiving your complaint, or after receiving any additional information we require. Please note that it might take longer to respond on exceptional or more complex cases.
- If we require further time to investigate the complaint, this will be communicated to you in writing.
- We will let you have our response in writing with full reasons. Please note that certain decisions may have to be approved by the Board or Management Committee of the Company. In such a case, we will communicate that fact to you, as well as the date on which a decision will be taken.
- In the event of us not being able to resolve the complaint or if you are not satisfied with our response, the complaint may be pursued, within a six (6) month's period, with the FAIS Ombud, or any other Ombud who has jurisdiction, contact details below. Alternatively, you may approach your own legal counsel.
- With regards to any business placed with Guardrisk Insurance Company, all complaints will automatically be escalated to Guardrisk through the online Porthole.
- With regards to any business placed through a Managing Agent on behalf of Lloyd's, complaints will be escalated after internal review to the relevant Compliance teams.
- In addition, all complaints must be notified to the Managing Agent immediately on receipt, so that the Managing Agent can fulfil its reporting responsibilities to Lloyd's. The Managing Agent's requirements for complaint handling are set out in the binding authority.

NOTE:

We are required to be provided with a six week period within which to resolve any complaint, before the FAIS Ombud will have jurisdiction.

OMBUD COMPLAINTS:

- The FAIS Ombud will not adjudicate in matters in excess of R800 000.
- Should your complaint result in a possible claim in excess of the determined amount above, Natsure will and may not request you to waive your rights.
- If you already instituted action in a court of law in respect of this complaint the Ombud will not consider the complaint.
- If the complaint was not resolved through conciliated settlement, the Ombud may make a determination which has the same legal status of a civil court judgement.
- An award of costs may be made against the person complained against.
- An award of costs may be made against a complainant if the conduct of the complainant was improper or unreasonable, or if the complainant caused an unreasonable delay in the finalisation of the investigation.

CONTACT INFORMATION TO LODGE COMPLAINTS:

Natsure:

Tel: (012) 364-0831
Fax: 086 517 2928
Email: tersiad@natsure.co.za
Website: www.natsure.co.za
Postal: Natsure
PO Box 72767
Lynnwood Ridge
Pretoria
0040
Physical: Block A, Block@Nature
472 Botterklapper Street
The Willows
Pretoria
0041

Compliance Officer: Masthead (Pty) Ltd

Tel: (012) 424 3400
Fax: (012) 424 3426
Email: sburger@masthead.co.za
Website: www.masthead.co.za
Postal: Masthead (Pty) Ltd
Building 6, Ground Floor
180 Garsfontein Road
Ashlea Gardens, Pretoria
0081
Physical: Building 6, Ground Floor
180 Garsfontein Road
Ashlea Gardens
Pretoria
0081

Guardrisk Insurance Company:

Tel: (011) 669 1000
Fax: (011) 669 1931
Email: compliance@guardrisk.co.za
Website: www.guardrisk.co.za
Postal: Guardrisk Insurance Company
PO Box 786015
Sandton
2146
Physical: 102 Rivonia Street
Sandown
Sandton
2146

Lloyd's:

Tel: +44 (0)20 7327 5693
Fax: n.a.
Email: complaints@lloyds.com
complaints@tokiomarinekiln.com
Website: www.lloyds.com/complaints
Physical: Fidentia House
Walter Burke Way
Catham Maritime
Chatham
Kent
ME4 4RN

Short-Term Insurance Ombud:

Tel: 0860 726 890
Fax: (011) 726 5501
Email: info@osti.co.za
Website: www.osti.co.za
Postal: Short-Term Insurance Ombud
PO Box 32334
Braamfontein
Johannesburg
2017
Physical: Block B, First Floor
One Sturdee Avenue
Cnr of Bolton Road &
Baker Road
Rosebank

FAIS Ombud:

Tel: 0860 324 766
Fax: (012) 348 3447
Email: info@faisombud.co.za
Website: www.faisombud.co.za
Postal: FAIS Ombudsman
PO Box 74571
Lynnwood Ridge
Pretoria
0040
Physical: Ground Floor, Block B
Sussex Office Park
Cnr of 473 Lynnwood Road &
Sussex Avenue, Lynnwood
Pretoria

In the event of us not reverting to you within the time periods indicated above, kindly contact Tersia Davey, Managing Director, for an explanation as to why we have not yet communicated with you. Please do not accept any communication from any person until it has been confirmed in writing.

APPROVAL:

The Complaints Policy and Procedure has been reviewed and approved by MANCO and will come into immediate force.



Tersia Davey

MANAGING DIRECTOR

