

## THE REWARDSCO GROUP COMPLAINTS POLICY AND PROCEDURES

**Reviewed By: Fathima Dildar**

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### 1. DEFINITIONS

#### 1.1 Complaint

Complaint means an expression of dissatisfaction by a person to a provider or, to the knowledge of the provider, to the provider's service supplier relating to a financial product or financial service provided or offered by that provider which indicates or alleges, regardless of whether such an expression of dissatisfaction is submitted together with or in relation to a client query, that -

- (a) the provider or its service supplier has contravened or failed to comply with an agreement, a law, a rule, or a code of conduct which is binding on the provider or to which it subscribes;
- (b) the provider or its service supplier's maladministration or wilful or negligent action or failure to act, has caused the person harm, prejudice, distress or substantial inconvenience; or
- (c) the provider or its service supplier has treated the person unfairly;

#### 1.2 Complainant

Complainant means a person who submits a complaint and includes a -

- (a) client;
- (b) person nominated as the person in respect of whom a product supplier should meet financial product benefits or that persons' successor in title;
- (c) person whose life is insured under a financial product that is an insurance policy;
- (d) person that pays a premium or an investment amount in respect of a financial product;
- (e) member;
- (f) person whose dissatisfaction relates to the approach, solicitation marketing or advertising material or an advertisement in respect of a financial product, financial service or related service of the provider,

who has a direct interest in the agreement, financial product or financial service to which the complaint relates, or a person acting on behalf of a person referred to in (a) to (f);

### 1.3 Client query

Client query means a request to the provider or the provider's service supplier by or on behalf of a client, for information regarding the provider's financial products, financial services or related processes, or to carry out a transaction or action in relation to any such product or service.

### 1.4 Internal Complaints Review and Escalation Process

Internal Complaints Review and Escalation Process means the system and procedures established and maintained by the FSP in accordance with the General Code of Conduct for the resolution of reportable complaints lodged against the FSP by complainants.

## 2. PURPOSE OF A COMPLAINTS POLICY

In terms of section 17(1)(a) of the General Code of Conduct for Authorised Financial Services Providers and Representatives ("the General Code of Conduct") a provider must establish, maintain and operate an adequate and effective complaints management framework, in order to ensure the effective resolution of complaints and the fair treatment of complainants.

The complaints management framework must be based on the following outcomes:

- Is proportionate to the nature, scale and complexity of the provider's business and risks;
- Is appropriate for the business model, policies, services, and clients of the provider;
- Enables complaints to be considered after taking reasonable steps to gather and investigate all relevant and appropriate information and circumstances, with due regard to the fair treatment of complainants;
- Does not impose unreasonable barriers to complainants; and
- Must address and provide for the matters as contained in Part XI of the General Code of Conduct.

In order to achieve the abovementioned outcomes, the organisation has adopted a complaints policy which outlines the organisation's commitment towards the fair, transparent and effective resolution of complaints. The organisation will also ensure that the Complaints Management Framework is regularly reviewed in order to ensure the effectiveness of same.

## 3. ESTABLISHING A COMPLAINTS MANAGEMENT FRAMEWORK

The organisation is committed towards rendering financial services with the proper due skill, care and diligence and in the best interests of its clients.

Despite the organisation's high service standards there may be instances where a client nevertheless prefers to submit a formal complaint against the organisation. In such instances the organisation will follow the complaints management framework as outlined below.

The FSP is committed towards a transparent and accessible complaints resolution process that is fair to all parties involved. In order to achieve these outcomes, the FSP undertakes as follows:

- The organisation's complaints management framework incorporates the following features, which the organisation is committed to enforcing at all times:
  - Relevant objectives, key principles and the proper allocation of responsibilities for dealing with complaints across the business of the organisation;
  - Appropriate performance standards (internally and where any functions are outsourced) in order for complaints management to ensure objectivity and impartiality;
  - Documented procedures for the appropriate management and categorisation of complaints which include expected timeframes and provides for circumstances under which these timeframes may be extended;
  - Documented procedures which clearly define the escalation, decision-making, monitoring, and oversight processes within the complaints management framework;
  - Appropriate complaint record keeping, monitoring and analysis of complaints, and reporting to executive management, the board of directors and any relevant committee of the board on –
    - Identified risks, trends and action taken in response thereto; and
    - The effectiveness and outcomes of the complaints management framework.
- Appropriate communication with complainants and persons representing complainants on the complaints and the complaints processes and procedures;
- Appropriate engagement between the organisation and the relevant Ombud;
- Compliance with requirements for reporting to the Regulator and public reporting in accordance with part XI of the General Code of Conduct.
- A process for managing complaints relating to the organisation's representatives and service suppliers, insofar as such complaints relate to services provided in connection with the organisation's financial products, financial services or related services, which process will:
  - Enable the organisation to reasonably satisfy itself that the representative or service supplier has adequate complaints management processes in place to ensure the fair treatment of complainants;
  - Provide for the monitoring and analysis by the organisation of aggregated complaints data in relation to the complaints received by its representatives and service suppliers and their outcomes;

- Include effective referral processes between the organisation and its representatives and service suppliers for handling and monitoring complaints that are submitted directly to either of them and require referral to the other for resolution; and
  - Include processes to ensure that complainants are appropriately informed of the process being followed and the outcome of the complaint.
  - The organisation will regularly monitor the complaints management framework.
  - The organisation will resolve client complaints by means of a practical resolution process that is managed effectively.
  - The organisation will train and empower all relevant staff members in order to facilitate and resolve complaints impartially.
  - The organisation will deal with complaints in a timely and fair manner, with each complaint receiving proper due consideration.
  - The organisation will take the necessary steps to investigate and respond promptly to a complainant.
  - The organisation will maintain a record of all complaints for a period of 5 years together with an indication of whether or not the complaint has been resolved.
  - The organisation will investigate, and where necessary, take appropriate action in order to avoid and prevent similar circumstances which gave rise to the complaint.
  - The organisation will ensure the recording of complaints and complaints-related information in an accurate, efficient and secure manner, and will establish and maintain appropriate processes for reporting of complaints related information to its governing body.
  - The organisation is committed to ensuring that its complaints processes and procedures are transparent, visible, and accessible through channels that are appropriate to the organisation's clients.
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#### **4. WHO IS THE REWARDSCO GROUP?**

The Rewardsco Group consists of Rewardsco Investments (Pty) Ltd, registration number 1996/009032/07 as the holding company and its subsidiaries:

- Rewardsco Sales (Pty) Ltd, registration number 2007/006416/07;
- Mondo Connect (Pty) Ltd, registration number 2014/125576/07;
- Jika (Pty) Ltd, registration number 2017/542571/07; and
- Vuka Money (Pty) Ltd, registration number 2014/077231/07.

#### **5. ALLOCATION OF RESPONSIBILITIES**

- The Managing Executive: Customer and the key individual of the organisation will therefore oversee and approve the effectiveness and implementation of the organisation's complaints management framework.
- The internal complaint review and escalation process may be delegated to key personnel within Customer Management, and any queries relating to the aforementioned process must be directed to same.

#### **6. RESPONSIBLE AND ADEQUATE DECISION-MAKING**

- Any person in the organisation that is responsible for making decisions or recommendations in respect of complaints generally or a specific complaint must –
  - Be adequately trained;
  - Have an appropriate mix of experience, knowledge and skills in complaints handling, fair treatment of customers, the subject matter of the complaints concerned and relevant legal and regulatory matters;
  - Not be subject to a conflict of interest; and
  - Be adequately empowered to make impartial decisions or recommendations.

#### **7. TREATING CUSTOMERS FAIRLY**

Treating Customers Fairly (TCF) framework principles are viewed seriously by the Rewardsco Group and all 6 (six) outcomes, as stated below, are practiced at all times. All objectives in interactions with any customer is to deliver excellent customer experiences to be achieved through the ongoing review of all business practices and analysis of complaints. The main

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objective is to be fair in the treatment of all consumers and partners and being compliant, in all aspects, of the 6 (six) outcomes of the TCF framework. These outcomes are:

- You are confident that your fair treatment is key to our culture;
- Products and services are designed to meet your needs;
- We will communicate clearly, appropriately and on time;
- We provide advice which is suitable to your needs and circumstances;
- Our products and services meet your standards and are of an acceptable level; and
- There are no barriers to access our service or to lodge any complaints.

## **8. INTERNAL COMPLAINT ESCALATION PROCESS**

- Through the adoption of this policy, the organisation establishes an appropriate internal complaints escalation process.
- The organisation is committed to ensuring that the procedures within the complaints escalation is not overly complicated and does not impose unduly burdensome paperwork or other administrative requirements on complainants.
- The internal complaint escalation process –
  - follows a balanced approach, which bears in mind the legitimate interests of all parties involved, including the fair treatment of complainants;
  - provides for the internal escalation of complex or unusual complaints at the request of the initial complaint handler;
  - provides for complainants to escalate complaints not resolved to their satisfaction;

## **9. DECISIONS RELATING TO COMPLAINTS**

- The organisation will clearly and transparently communicate the availability and contact details of the relevant Ombud to complainants at the start of the relationship, and in relevant periodic communications. The organisation will also display and make available information regarding the relevant Ombud on its premises and website.

## **10. COMPLAINTS PROCEDURE**

- In line with achieving the Treating Customers Fairly Outcomes, the following underpins the 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.

**Complaints are dealt with as follows:**

The internal complaints escalation 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:

- The date and contents of the complaint is logged in the Complaints Register.
- All complaints must be sent in writing together with any supporting documents by email to the relevant company as follows:

Rewardsco Investments (Pty) Ltd: [customercare@rewards.co.za](mailto:customercare@rewards.co.za)

Rewardsco Sales (Pty) Ltd: [customercare@rewards.co.za](mailto:customercare@rewards.co.za)

Vuka Money (Pty) Ltd: [CustomerCare@vuka.online](mailto:CustomerCare@vuka.online)

Jika (Pty) Ltd: [Customercare@jikaconnect.co.za](mailto:Customercare@jikaconnect.co.za)

Mondo Connect (Pty) Ltd: [customercare@mondo.co.za](mailto:customercare@mondo.co.za)

- Should the complainant not have access to the Internet or Electronic Mail facilities; the below contact number for the relevant company should be used:

Rewardsco Investments (Pty) Ltd: 086 123 6666

Rewardsco Sales (Pty) Ltd: 086 123 6666

Vuka Money (Pty) Ltd: 086 158 6284

Jika (Pty) Ltd: 087 310 9571

Mondo Connect (Pty) Ltd: 086 123 8888

- The relevant customer services personnel 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 will be assigned accordingly.
  - investigate, evaluate and assess the complaint to ascertain whether the complaint can be resolved immediately. If the complaint can be resolved immediately, the necessary action will be taken, and the complainant will be advised accordingly.
- The standard time frame in the Customer Services 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. Where the complaint cannot be resolved 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 there has been receipt of all information required and/or the investigation has been completed. The complainant will be kept informed of the progress at least every **10 working days**.)

- Once the complaint has been resolved, the complainant will be contacted telephonically and advised thereof. In addition, a follow up will be carried out in writing in order to provide written reasons of the outcome.
- Where a complaint is resolved in the complainants favour, a full and appropriate level of redress / corrective action will be offered to the complainant without delay.
- It is encouraged for complainants to approach the relevant entity of the Rewardsco Group with their concerns before escalating a complaint to the insurer/s and/or relevant external dispute resolution entity.
- Should the outcome of the dispute resolution not be in the complainant's favour then the complainant has the right to request the insurer to review any insurance related matters:

Insurance benefits underwritten by **Guardrisk Insurance Company Limited (FSP No. 75)**

**Tel:** 011 669 1000 **Fax:** 012 675 3856

Email : <mailto:info@guardrisk.co.za>

Postal Address : PO Box 786015, Sandton, 2146

Physical Address : 3rd Floor, 102 Rivonia Road, Sandown, Sandton, 2196

Insurance benefits underwritten by **African Unity Life Limited (FSP No. 8447)**

Email : [compliance@africanunity.co.za](mailto:compliance@africanunity.co.za)

Tel : 021 883 8000

Postal Address : PO Box 4061, Durbanville, 7550

Physical Address : Springfield Officepark, 109 Jip de Jager Drive, Belville, 7530

Insurance benefits underwritten by **Dotsure Limited (FSP No. 39925)**

Email : [u2us@dotsure.co.za](mailto:u2us@dotsure.co.za)

Tel : 0861 368 7873

Postal Address : PO Box 9738, George, 6530

Physical Address : 127A York Street, George, 6529

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

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

Email: [info@ombuds.co.za](mailto:info@ombuds.co.za)

Tel: 021 657 5000

Postal Address : Private Bag X45, Claremont, Cape Town, 7735

**FAIS OMBUDSMAN**

Email: [info@faisombud.co.za](mailto:info@faisombud.co.za)

Tel: 012 470 9080

Postal Address : P O Box 74571, Lynwood Ridge, 0040

**THE OMBUDSMAN FOR SHORT TERM INSURANCE ('OSTI')**

Email: [info@osti.co.za](mailto:info@osti.co.za)

Tel: 011 726 8900

Physical Address : PO Box 32334, Braamfontein, 2017

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