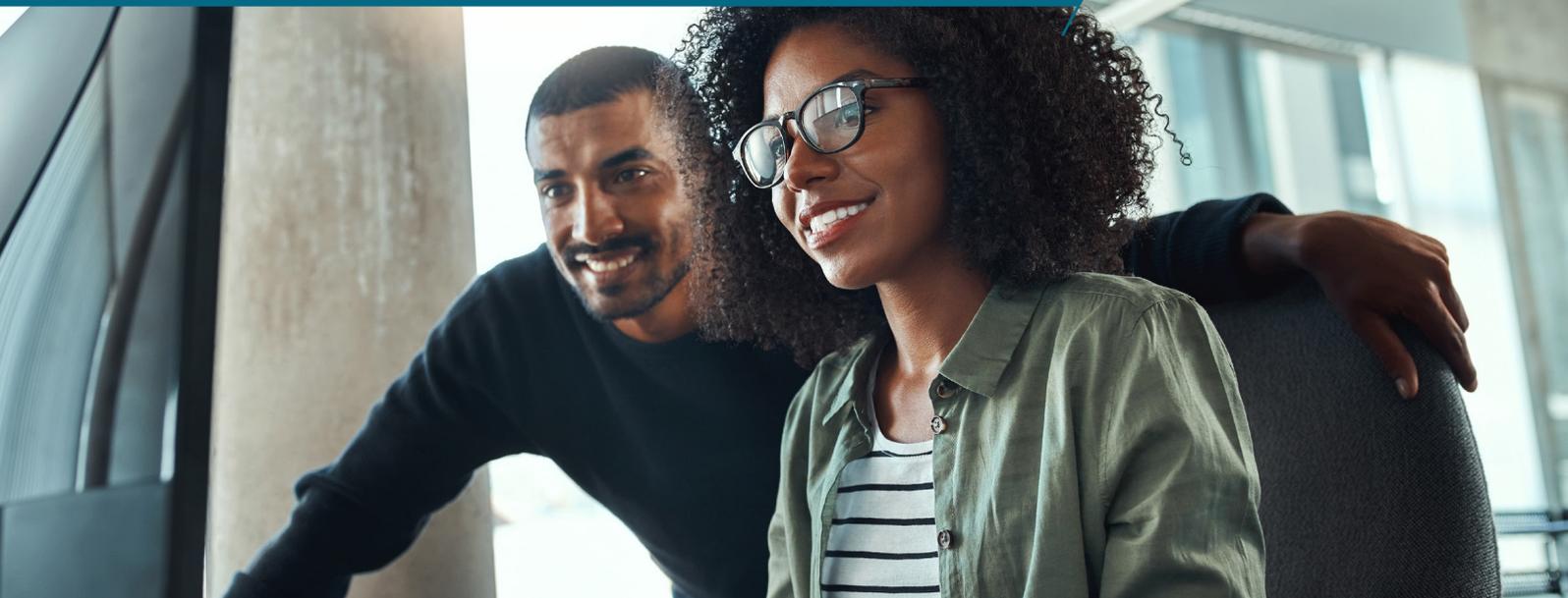


Complaints Management

Policy & Procedure Manual



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1. Introduction

Easy Debit Payment Solutions (Pty) Ltd “Easy Debit” has established a “framework” for both the management of complaints that seeks to comply with the amendments to the General Code of Conduct published in General Notice 706 of 2020 and the provisions of the Financial Advice and Intermediary Act 2002 “FAIS” on the management of complaints in order to ensure that complaints are resolved effectively and that our clients are treated fairly.

In the spirit of promoting the highest standards of professional and ethical behaviour, as well as upholding the principles of treating customer fairly, this framework was adopted by Easy Debit management, who resolved that each overseeing individual or manager, sales/service consultant and staff member of Easy Debit should comply with the requirements of this framework.

Easy Debit has established and maintains a system for complaint management that:

- is proportionate to the nature, scale and complexity of the business and risks;
- is appropriate for the business model, policies, services and to our clients;
- enables Complaints to be considered after taking reasonable steps to gather and investigate all relevant information and circumstances, with due regard to the fair treatment of Clients; and does not impose unreasonable barriers to Clients.

2. Definitions

2.1. “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 services;

2.2. “Client” 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 person’s successor in title;

- (c) Person whose life is insured under a financial product that is an insurance framework
- (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);

2.3. “Compliant” 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 services 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 provider has treated the person unfairly;

2.4. “Compensation payment” means a payment, whether in monetary form or in the form of a benefit or service, by or on behalf of a provider to a client to compensate the client for a proven or estimated financial loss incurred as a result of the provider or employer’s contravention, non-compliance, action, failure to act, or unfair treatment forming the basis of the complaint, where the provider accepts liability for having caused the loss concerned; but excludes any:

- (a) goodwill payment

- (b) payment contractually due to the client in terms of the financial product or financial service concerned; or
- (c) refund of an amount paid by or on behalf of the client to the provider where such payment was not contractually due; and includes any interest on late payment of any amount referred to in (b) or (c);

2.5. "Framework" means this Complaints Management Framework.

2.6. "Goodwill payment" means a payment, whether in monetary form or in the form of a benefit or service, by or on behalf of a provider to a client as an expression of goodwill aimed at resolving a complaint, where the provider does not accept liability for any financial loss to the client as a result of the matter complained about;

2.7. "Internal complaint resolution system and procedures" in relation to an FSP and a client, means the system and procedures established and maintained by the FSP in accordance with the General Code of Conduct for the resolution of complaints by clients;

2.8. "Member" in relation to a complaint means a member of a:

- (a) Pension fund as defined in section 1(1) of the pension Funds Act, 1956
- (b) Friendly society as defined in section 1(1) of the friendly societies Act, 1956
- (c) Medical scheme as defined in section 1(1) of the Medical Scheme Act, 1998; or
- (d) Group scheme as contemplated in the Framework Protection Rules made under section 62 of the Long-term Insurance Act, 1998, and section 55 of the Short-term Insurance Act, 1998;

2.9. "Ombud" means the Ombud for Financial Services Providers, commonly referred to as the FAIS Ombud, referred to in section 20(2) of the FAIS Act;

2.10. "OSTI" refers to the Ombudsman for Short Term Insurance;

2.11. "Rejected" in relation to a complaint means that a complaint has not been upheld and the

provider regards the complaint as finalised after advising the client that it does not intend to take any further action to resolve the complaint and includes complaints regarded by the provider as unjustified or invalid, or where the client does not accept or respond to the provider's proposals to resolve the complaint;

2.12. "Reportable complaint" means any complaint other than a complaint that has been:

- (a) Upheld immediately by the person who initially received the complaint;
- (b) Upheld within the provider's ordinary processes for handling client queries in relation to the type of financial product or financial service complained about, provided that such process does not take more than five business days from the date complaint is received; or
- (c) Submitted to or brought to the attention of the provider in such a manner that the provider does not have a reasonable opportunity to record such details of the complaint as may be prescribed in relation to reportable complaint;

2.13. "Resolution" or "internal resolution" in relation to a complaint and an FSP means the process of resolving of a complaint through and in accordance with the internal complaint resolution system and procedures of the provider;

2.14. "Rules" means the Rules on Proceedings of the Office of the Ombud for Financial Services Providers, 2002; and

2.15. "Upheld" means that a complaint has been finalised wholly or partially in favour of the client and that:

- (a) the client has explicitly accepted that the matter is fully resolved; or
- (b) it is reasonable for the provider to assume that the client has so accepted; and
- (c) all undertakings made by the provider to resolve the complaint have been met or the client has explicitly indicated its satisfaction with any arrangements to ensure such undertakings will be met by the provider within a time accepted to the client.

3. Objectives and Scope

3.1. Objectives

The objective of this framework is to govern and guide Easy Debit and its employees to achieve rational outcomes when managing complaints in accordance with the FAIS Act and to:

- align the actions of the employees of Easy Debit with the prescriptions of the law as regulated by the Financial Sector Conduct Authority (“FSCA”)
- ensure that clients are provided with the best possible support for complaint resolution and;
- ensure that Complaints are resolved in a timeous manner.

3.2. Scope

All Easy Debit employees will be governed by this framework and the aim of this framework is to provide principles to guide the handling of complaints and to affirm the procedures needed for the complaint management process.

4. Basic Principles

Easy Debit is committed to maintain an internal complaint resolution system and procedures based on the following principles:

- (a) Maintenance of a comprehensive complaints framework that outlines the Easy Debit’s commitment to and system and procedures for internal resolution of complaints;
- (b) Transparency and visibility, ensuring that clients have full knowledge of the procedures for resolution of their complaints;
- (c) Accessibility of facilities, ensuring the existence of easy access to such procedures at the office of Easy Debit open to clients, or through ancillary postal, fax, telephone or electronic helpdesk support; and
- (d) Fairness, ensuring that a resolution of a complaint can during and by means of the resolution process be affected which is fair to both clients and Easy Debit and its staff.

5. Responsibilities and Accountability

The Directors of Easy Debit has delegated responsibility and accountable for the implementing and management of this framework to the:

- Operations Manager;
- Key Individual “KI”; and
- Internal Compliance Officer.

The operations manager and KI will approve and oversee the implementation of the framework and ensure that adequate resources are allocated to the handling of complaints and that any individuals who deal with complaints are:

- adequately trained, appropriately qualified and experienced in complaints handling;
- not be subject to a conflict of interest; and
- be adequately empowered to make impartial decisions or recommendations.

Together with the internal compliance officer, the operations manager is responsible for ensuring that all complaints lodged are handled in accordance with this framework.

6. Complaints Escalation and Review Process

The internal complaint review and escalation process is delegated to the Operations Manager, the KI and Internal Compliance Officer, and any queries concerning the process must be addressed to the same.

Whenever a client is not satisfied with the outcome of a complaint, the clients have the right to have the decision reviewed by the operations manager, the KI and/or internal compliance officer who has the requisite skills, knowledge, experience, seniority and authority to deal with the review or escalation process.

7. Categories of Complaints

Reportable complaints are categorised as being general and those that are in line with the outcomes of the TCF. The categorisation of complaints is listed below:

General complaints categories:

- Communication
- Operational
- Product performance

TCF related categories:

- Design of products and services
- Information provided to clients
- Advice
- Products or service performance
- Service to clients
- Product accessibility
- Complaints handling

8. Record Keeping, Monitoring and Analysis

Easy Debit will ensure that complaints are recorded accurately and efficiently. In an ongoing basis, Easy Debit will maintain the following details on reportable complaints:

- received, upheld, outstanding / rejected (and reasons for the rejection);
- escalated to the internal complaint's escalation process; and
- referred to an Ombud and their outcome.

Information on complaints will be scrutinised on an ongoing basis. In order to monitor the risk of conduct and the efficacy of the complaint process; trends, risks and remedial actions will be considered.

Easy Debit undertakes to maintain for a period of five (5) years, a record of the complaints received along with an indication of whether or not such complaints have been resolved.

9. Process to Submit a Complaint

9.1. Lodging of Complaints

Any client who feels that he/she has been prejudiced in any way by Easy Debit or its employees may

submit their complaints via any of the following channels along with relevant supporting documentation:

Website: <https://www.easydebit.co.za/contact-us>.

Email: complaints@easydebit.co.za

Telephone: 011 866 0000

Postal: 13 Padstow St, Raceview, Alberton, 1449.

Procedure

- All complaints must be submitted in writing and must include all relevant information and copies of relevant documentation.
- All complaints will be entered into our formal complaints register within 24hrs of receipt.
- We will promptly acknowledge, in writing, to the client receipt of such complaint within 48hrs and furnish the client with details of the contact person who will be involved with the investigation and resolution of the complaint.

9.2 Resolution of complaints

- All complaints will be handled in a timely and equitable manner, with each complaint receiving sufficient consideration in a properly and efficiently managed process.
- Non-routine serious complaints will be handled by senior staff with requisite skills, knowledge, experience, seniority and authority to resolve the matter as soon as possible.
- Easy Debit undertakes to inform the client of the outcome of the investigation relating to the complaint within six (6) weeks of receipt of the initial written complaint.
- In a circumstance where the complaint is resolved in favour of and to the satisfaction of the consumer, we ensure that the client is offered a full and appropriate degree of redress without any further delays.
- In a circumstance where the complaint is not resolved to the satisfaction of the client, we will ensure that the client is made aware of their rights regarding the resolution/dismissal of the complaint in order to pursue further action at the office of the Ombudsman.

10. Referral to Ombudsman

In circumstances where a complaint relates to a financial service rendered by Easy Debit or employees of Easy Debit and where it is alleged that

- the complaint has not been resolved within 6 weeks of receipt; or
- where the complaint has been dismissed; or
- where the client is not satisfied with the results of the investigation into the complaint,

we will ensure that the client is made aware of their rights in terms of the FAIS Act or any other statute. This includes providing the client with a detailed written report on the complaint investigation and its conclusions, as well as contact information for the Ombud for Financial Services Providers, where the client will have six (6) months from the date of Easy Debit's notification to refer the matter to the Ombuds. The contact details for the Ombuds are as follows:

FAIS Ombuds

Postal Address: PO Box 74571, Lynnwood Ridge, 0040
Telephone: (012) 470-9080 / 0860 324 766
Fax: (012) 348-3447
E-mail: info@faisombud.co.za
Website: www.faisombud.co.za

Ombuds of Short-term Insurance "OSTI"

Postal Address: P O Box 32334, Braamfontein, 2017
Telephone: (011) 726-8900 / 0860 726 8900
Fax: (011) 726-5501
E-mail: info@osti.co.za
Website: www.osti.co.za

Before submitting a complaint to the FAIS Ombuds, the client must -

- endeavor to resolve the complaint with Easy Debit of which the responding party has six (6) weeks in which to resolve the complaint with the client.
- refer the matter to the FAIS Ombudsman within six (6) months of receipt of Easy Debit notification;
- ensure the complaint does not constitute a monetary claim in excess of R800,000.00 unless the Easy Debit has agreed in writing to this limitation being exceeded.

11. Framework Review

The Complaints Handling Procedure Manual shall be reviewed periodically, but at least annually, by management and shall record any changes thereto. A copy of the Framework or any changes thereto will be published on Easy Debit website.

12. Non-Compliance with the Framework

Any disciplinary action resulting from a violation of this framework will be taken in compliance with the Easy Debit disciplinary code and grievance procedure. An internal investigation will be undertaken when an individual is suspected of violating the procedures. Civil and/or criminal disciplinary action against the employee may be taken, depending on the outcome of the investigation.