Complaints Management Policy

Beyond Intermediary Services (Pty) Ltd
FSP No.: **51405**
(The Company)

	Date	Author	Description
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CONTENTS

1. Overview

This is the official Complaints Resolution Manual implemented for Beyond Intermediary Services (PTY) LTD.

2. Purpose

The Financial Advisory and Intermediary Services Act (FAIS Act) requires that a financial service provider (i.e. our company) must maintain an internal complaints resolution system and procedure in the event that a customer complains about a financial service rendered by the financial services provider.

Treating Customers Fairly (TCF) Outcome 6 provides that “Customers do not face unreasonable post-sale barriers imposed by firms to change product, switch providers, submit a claim or make a complaint”.

This document not only provides a complaints procedure in conformance with legislative expectations but it also explains the procedure should you wish to complain about any of the financial services rendered by our company, and sets out the process which our company will follow in order to resolve the complaint.

3. Objectives

- To deliver consistent, high-quality and accountable responses to complaints received, across Beyond Intermediary Services.
- To ensure that our complaints procedure is in line with the overall regulatory requirements and Treating Customer Fairly outcomes and industry ‘best practices’.

4. Services Covered

Beyond Intermediary Services provides automated services in Category 1 Long-Term Insurance. Therefore, the scope of the resolution process will pertain to such services rendered.

5. Definitions

“Client” of a financial services provider means any user, former user or beneficiary of one or more of the financial products or services provided by the financial services provider, and their successors in title.

"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;

"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 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);
g) is a customer or prospective customer of the financial services provider concerned and has
h) a direct interest in the agreement, product or service to which the complaint relates; or
i) has submitted the complaint on behalf of a person mentioned in (a), provided that a prospective customer will only be regarded as a complainant to the extent that the complaint relates to the prospective customer's dissatisfaction in relation to the application, approach, solicitation or advertising or marketing material contemplated in the definition of "prospective customer".

"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's has treated the person unfairly;

"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 complainant to compensate the complainant for a proven or estimated financial loss incurred as a result of the provider'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 complainant in terms of the financial product or financial service concerned; or
c) refund of an amount paid by or on behalf of the complainant 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);

"FAIS" means the Financial Advisory and Intermediary Services Act No. 37 of 2002 which was designed to protect customers of financial services providers; regulate the selling and advice-giving activities of the FSP (FSPs); ensure that the consumers are provided with adequate information about the financial product they use and about the people and institutions who sell these financial products and establish a properly regulated financial services profession.

"FAIS Ombud" the FAIS Ombud deals with complaints submitted to the Office by a specific customer against a financial services provider.

"Financial Services Provider" means Beyond Intermediary Services (PTY) LTD with FSP Number 51405 and place of business as 1st Floor, Roland Garros, The Campus, 57 Sloane Street, Bryanston, 2129.

"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 complainant as an expression of goodwill aimed at resolving a complaint, where the provider does not accept liability for any financial loss to the complainant as a result of the matter complained about;

"member" in relation to a complainant means a member of a -

a) pension fund as defined in section 1(1) of the Pension Funds Act, 1956 (Act 52 of 1956);
b) friendly society as defined in section 1(1) of the Friendly Societies Act, 1956 (Act 25 of 1956);
c) medical scheme as defined in section 1(1) of the Medical Schemes Act, 1998 (Act 131 of 1998); or
d) group scheme as contemplated in the Policyholder Protection Rules made under section 62 of the Long-term Insurance Act, 1998, and section 55 of the Short-term Insurance Act, 1998;

"Prospective customer" of a financial services provider means a person who has applied to or otherwise approached the financial services provider in relation to becoming a customer of the financial services provider, or a person who has been solicited by the financial services provider to become a customer or has received marketing or advertising material in relation to the financial institution's products or services.

"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 complainant 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 complainant does not accept or respond to the providers proposals to resolve the complaint;

"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 the 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 complaints; and

"Resolved" in relation to a complaint means that the complaint has been finalised in such a manner that the complainant has explicitly accepted that the matter is fully resolved or that it is reasonable for the financial services provider to assume that the complainant has so accepted. A complaint should only be regarded as resolved once any and all undertakings made by the financial services provider to resolve the complaint have been met.

"Routine Complaints" is where a customer submits an expression of dissatisfaction together with a customer query or relating to a customer query and which further can be resolved internally within a period of fifteen (15) days. Routine complaints are therefore customer queries which have been previously escalated by the customer but now the customer has become dissatisfied with the process being followed to resolve the customer query.

"Serious Complaints" are complaints that contravene regulatory requirements and are likely or may already have caused a customer to suffer financial prejudice.

"Service provider" means another person with whom the financial services provider to whose products or services the complaint relates has an arrangement in relation to the marketing, distribution, administration or provision of such products or services, regardless of whether or not such other person is the agent of the financial services provider.

"TCF" Treating Customers Fairly is an outcome-based regulatory and supervisory approach designed to ensure that specific, clearly articulated outcomes for fairness regarding financial services to customers are delivered on by regulated FSPs. Financial Service Providers are expected to demonstrate that they deliver the required six (6) TCF Outcomes to their customers throughout the product lifecycle, from product design and promotion, through advice and servicing, to complaints and claims handling – and throughout the product value chain.

6. Components

The components of the Beyond Intermediary Services Complaints Management Framework are:

- The Complaints Management Policy
- Complaints Management Framework Register

The Complaints Management Policy provides for the business, staff, and clients with a clear and considered process to manage and resolve client complaints. It explains the steps customers could take when making complaints. It identifies the steps in discussing, considering, addressing, and resolving complaints and indicates some of the solutions offered to resolve complaints.

The Complaints Management Framework Register serves as a formal document in which complaints are recorded in terms of client details, the complaint received, the TCF category the complaint belongs to, the dates that the complaint was dealt with and resolved etc. This allows complaints to be resolved effectively and with due process followed.

7. Review

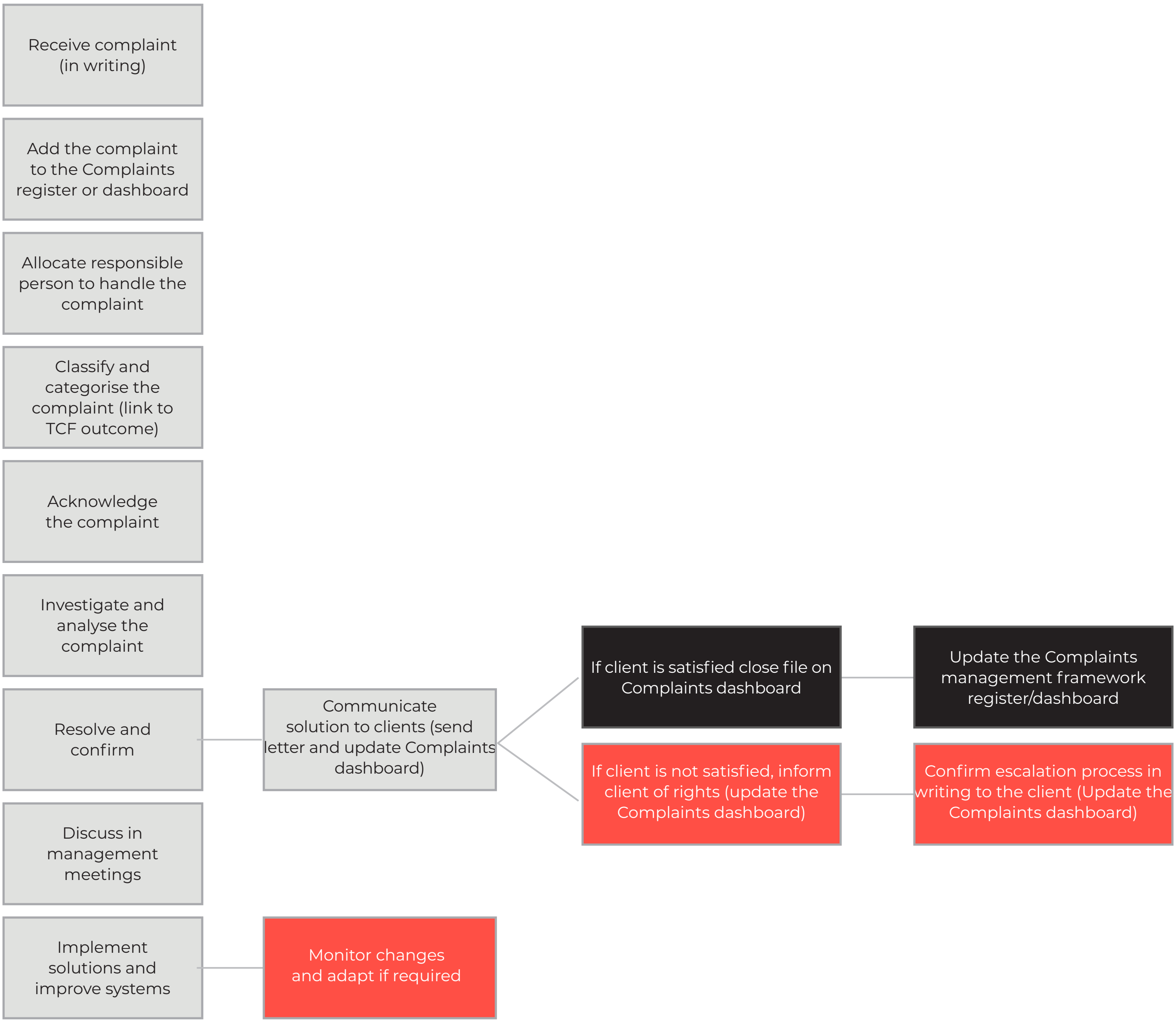
The Beyond Intermediary Services undertakes to review its Complaints Management Framework and document the changes thereto on an annual basis, alternatively whenever there are changes in the business that impact the Complaints Management Framework. A Review Register is set out in Annexure A.

The Key Individual, is responsible for reviewing and updating the Complaints Management Framework.

8. Process Overview

The following key steps must be followed for all customer complaints received by the staff of Beyond Intermediary Services.

The requirements for each step are detailed below.



Detailed complaints resolution process:

Process Step	Step Details
1. Lodge/Receive a Complaint	The client is to submit the complaint to the FSP in writing to the contact details that appear herein. The complaint can be submitted by: • Hand • Post • Fax • Email (If a complaint is submitted telephonically, Beyond Intermediary Services will send the client an email to request the relevant details regarding the complaint. The client needs to respond and provide the requested information in writing (e.g. hand, post, fax or email). • The client must submit sufficient detail of the complaint, this includes their: - Name and surname - Policy number - ID number - Postal address - Financial Advisor - Product Supplier - Product Type: Risk, Investment, Short term, Endowment, Employee Benefits, Disability, Medical Aid, Unit Trust, Wills etc. - Complaint Category: Product features and charges; Information Disclosures; Product performance; Client Services; Access; Changes or Switches; Complaints Handling; Claims; or Other complaints. - Brief detail of the complaint
2. Acknowledge	Beyond Intermediary Services will: • Acknowledge all complaints within 24 hours of receipt. • Where an acknowledgement is made telephonically it will be followed up with a written response whether by SMS or email. • Clearly and transparently communicate the availability and contact details of the relevant Ombud services to complainants (clients) at all relevant stages of the relationship with a client, including at the start of the relationship and in relevant periodic communications. • Ensure all communication with a complainant is in plain language. • Provide, wherever feasible, clients with a single point of contact for submitting complaints. • Promptly inform a complainant of the process to be followed in handling the complaint, including- - Contact details of the person or department that will be handling the complaint; - indicative and, where applicable, prescribed timelines for addressing the complaint; - details of the internal complaints escalation and review process if the complainant is not satisfied with the outcome of a complaint; - details of escalation of complaints to the office of a relevant Ombud and any applicable timeline; and - details of the duties of the provider and rights of the complainant as set out in the rules applicable to the relevant Ombud • Despatch a complaint reference number to the complainant on the acknowledgment of the complaint. • Disclose to the client: - the type of information required from a complainant, if this has not been provided already; - where, how, and to whom a complaint and related information must be submitted, if this has not been provided already; - expected turnaround times concerning complaints; and - any other relevant responsibilities of a complainant. • Despatch the details of the person allocated to the complaint to the complainant within 48 hours from receipt.
3. Allocate a Responsible person	Beyond Intermediary Services will ensure that: • The complaint is allocated and dealt with by a trained staff member. • The person responsible for the clients' complaint will furnish the client with his/her contact details and the reference number of the complaint (if applicable) • The Key Individual has oversight over the complaints allocated to various personnel such as the Complaints Manager.

4. Classify	Beyond Intermediary Services will: • Ensure that all potential issues are captured and classified for escalation, review, and action, as required; • Reduce any complaint, issue or negative client interaction to writing then log and classify for action in the Complaint Management Framework Register; • Where a third party is acting on behalf of a complainant, Beyond Intermediary Services will ensure that such third party delivers a certified or original consent or power of attorney to act on behalf of a complainant: - no further dealings will be pursued with such a third party until the proper authority is obtained, however - the complaint will be taken up directly with the complainant on whose behalf the complaint is made • Formally log all complaints using a relevant process / Complaints Management Framework Register. **RISK** All complaints will be prioritised as follows: **Risk 1** - These are routine complaints with potentially low business impact. • Routine complaints: • require a response to the client within 15 working days; • have the potential of becoming serious or official complaints if disregarded or ignored by the FSP; • require staff to review the complaint and its priority with the Complaints Manager before proceeding to the next step; • requires the Complaints Manager to decide on the appropriate person(s) to carry out subsequent steps, including the investigation. **Risk 2** - These complaints are urgent and can have a serious business impact. Serious complaints: • require a response to the client within 5 - 10 working days; • are logged on media platforms, received from Legal Advisors or immediately evidence contravention of legislation requirements such as failure to conduct a proper needs analysis; • can cause reputational harm to a business and/or may cause financial loss to a client; • need to be handled by the Complaints Manager/Key Individual or a suitable senior person delegated to the task by the Complaints Manager or Key Individual; • Complaints received from third parties and/or Legal Advisors will be responded to within 24 hours: - acknowledge receipt of the complaint; - further requesting authority to act on the complainant's behalf such as a power of attorney or consent by the complainant to deal with the complaint on the complainant's behalf. No information will be divulged to a third party who does not have the proper authority to act on a complainant's behalf. **Risk 3** - These are urgent official complaints received from Authorities e.g. FAIS Ombud. The regulator usually stipulates a response time of 30 days from receipt of the complaint. Urgent official complaints: • are handled by the Complaints Manager/Key Individual. • Alternatively, the investigation of the complaint may be delegated to a suitable senior person selected by the Complaints Manager/Key Individual. • The required draft response and attachments will be collated by such senior person as decided upon by the Complaints Manager/Key Individual. • The Complaints Manager is responsible for compiling the response to the Authority. • The response to the Authority will be made within the stipulated turnaround time stated on the official correspondence.

5. Categorisation	**The FSP will categorise reportable complaints as per the following minimum categories:** • The design of a financial product, financial service, or related service, including the fees, premiums, or other charges related to that financial product or financial service; • Information provided to clients; • Financial product or financial service performance; • Service to clients, including those relating to premium collection or lapsing of a financial product; • financial product accessibility, changes or switches; • Complaints handling; • Insurance risk claims which include non-payment of claims; and • Other complaints which can be additional categories relevant to the FSPs chosen business model, financial products, financial services, and client base that will support the effectiveness of its Complaints Management Framework in managing conduct risks and effecting improved outcomes and processes for its clients
	Group the Complaints The FSP will thereafter: • Categorise, record, and report on reportable complaints by identifying the category to which a complaint closely relates and group complaints accordingly. • Narrow down the categories to the impact on clients • Measure the impact of the complaint by further categorising it according to the following TCF Outcomes **TCF Outcome 1** Includes complaints: • other complaints relating to management issues **TCF Outcome 2** Includes complaints: • relating to the design of a product/service • relating to product features and charges that affect this TCF outcome **TCF Outcome 3** Includes complaints: • relating to unsuitable or inaccurate, misleading, confusing, or unclear information provided to a client throughout the life cycle of a product • This could vary from product information, information provided in advertising or marketing material about a product or service rendered etc. • Beyond Intermediary Services is to include the Conflict of Interest disclosures required by the FAIS General Code of Conduct (Code); Section 4 and 5 of the Code or any other disclosure requirements in terms of the Code or any other legislation in these disclosures **TCF Outcome 5** Includes complaints: • about product performance and service-related issues • relating to a client's disappointment with limitations in a product/service performance of which they were unaware • relating to the inability of a product to meet a client's expectations • related to a Product Supplier's exercise of a right to terminate a product or amend its terms **TCF Outcome 6** Includes complaints: • relating to product accessibility or changes. • relating to handling and complaints relating to claims

6. Investigate	Beyond Intermediary Services will: • Analyse the root cause of the complaint to enable the complaint to be appropriately dealt with and avoid, if possible, its re-occurrence • Identify and clarify internal and external key facts. • Should a complaint relate to product features or services handled solely by a product supplier, this matter will be escalated and appropriately dealt with in conjunction with the product supplier, ensuring that the matter is resolved to the satisfaction of the complainant. • Whenever a complaint is escalated or reviewed ensure that: - A balanced approach is followed, bearing in mind the legitimate interests of all parties involved including the fair treatment of clients - Internal escalation of complex or unusual complaints at the instance of the initial complaint handler is provided for; - Clients may escalate complaints not resolved to their satisfaction - the escalation is allocated to an impartial, senior functionary within the provider or appointed by the provider for managing the escalation or review process of the provider. • Ensure that procedures within the complaints escalation and review process are not overly complicated or impose unduly burdensome paperwork or other administrative requirements on complainants (clients). • Document all areas of interaction and communication. • Ensure accurate, efficient, and secure recording of complaints and complaints-related information. • In respect of each reportable complaint, keep a record of: - All relevant details of the complainant and the subject matter of the complaint; - Copies of all relevant evidence, correspondence, and decisions; - The complaint categorization; - The progress and status of the complaint, including whether such progress is within or outside any set timelines;
	• Concerning reportable complaints categorised on an ongoing basis record the number of complaints: - Received, - Upheld, - Rejected and their reasoning, - Escalated by complainants (clients) to the internal complaints escalation process, - Referred to an Ombud and their outcomes; - and amounts of Compensation payments made, - and amounts of goodwill payments made, - the total number of complaints outstanding. • Ensure complaints information recorded is scrutinised and analysed on an ongoing basis and utilised to manage conduct risks and effect improved outcomes and processes for clients, and to prevent recurrences of poor outcomes and errors. • Obtain consent from the complainant to ensure that no personal information is divulged or processed without the complainant's knowledge or consent. • Keep the complainant appropriately updated on the progress of the investigation.
7. Resolve and Confirm	Beyond Intermediary Services will: • Ensure that the proposed resolution meets the Treating Customers Fairly Outcomes, does not prejudice Beyond Intermediary Services or complainant, and does not involve any unnecessary legal or financial implications. • Document and assess the proposed action agreed upon with the Complaints Manager and/or Key Individual and Representative. • Discuss and review the signed off resolution with the complainant to ensure fairness and clarity and to further ensure that the resolution deals with the root cause of the complaint. • Include recognition and documentation of any underlying issues that have contributed to the complaint and recommendations for actions to prevent the further occurrence in the review.

8. Respond to Client	Beyond Intermediary Services will: • Ensure the complaint process is accessible through channels that are appropriate to Beyond Intermediary Services' clients. • Ensure there are no charges for making use of the complaint process. • Ensure communication is in plain language. • Clearly explain the details of the findings and proposed resolution to the client - within the agreed timeframes. • Where a complaint is upheld, if there has been any commitment by Beyond Intermediary Services to make a compensation payment, goodwill payment, or to take any other action ensure it is carried out without undue delay and within the agreed timeframes. • Where a complaint is rejected, the complainant must be provided with clear and adequate reasons for the decision and must be informed of any applicable escalation or review processes, including how to use them and any relevant time limits. • Send a written acknowledgment of the complaint to the complainant, with contact details of the FAIS Ombud, if the complaint cannot be addressed within three weeks and a single point of contact for submitting complaints. • If within six weeks of receipt of a complaint Beyond Intermediary Services has been unable to resolve the complaint to the satisfaction of a complainant, the complainant may: • refer the complaint to the Office of the FAIS Ombud if he/she wishes to pursue the matter; and • the complainant must do so within six months of receipt of such notification. • Appropriate processes for engagement with the Ombud.
9. Follow up and review	Beyond Intermediary Services will: • Diarise complaints to ensure it remains within the appropriate turnaround times. • Keep complainant appropriately informed of the progress of their complaint. • Keep complainant appropriately informed of causes of any delay in the finalisation of a complaint and revised timelines, should a complaint exceed the turnaround time due to unforeseen and reasonable circumstances. • Keep complainant appropriately informed throughout the complaints process of the resolution being sought. • Conduct a follow-up on the resolution of the complaint, to ascertain whether the client was satisfied with the complaints-handling process and the resolution sought and whether the resolution was proper and fair. • Any negative responses will be actioned in the quarterly review of complaints.
10. Quality Assurance and Close	Beyond Intermediary Services will: • Ensure that the Complaints Manager ensures that all employees of the business have access to the Complaints Management Policy. • Ensure the Key Individual approves and oversees the effectiveness of the implementation of the Complaints Management Framework. • Ensure the responsible person, making a decision or recommendation is adequately trained, has an appropriate mix of experience, knowledge, and skills in complaints handling, fair treatment of customers, subject matter concerned, relevant legal and regulatory matters also not subject to conflict of interest and be adequately empowered to make impartial decisions or recommendations. • Ensure clients will be made aware of the Complaints Management Policy and will have access to the manual upon request. • All complaints will be reviewed quaterly and will be used as TCF Management Information to improve overall TCF outcomes. • Action all complaints to prevent re-occurrence of poor outcomes and errors, where feasible. • Ensure complaints are scrutinised and analysed on an ongoing basis. • Ensure complaints are utilised to manage conduct risks. • Ensure complaints effect improved outcomes and processes for its clients. • Update the Complaints Management Framework Register. • Ensure compliance with any prescribed requirements for reporting complaints information to any relevant designated authority or the public as may be required by the Registrar. • Close the matter.

9. Suppliers

Beyond Intermediary Services will follow the same process as set out above.

10. Decisions Relating to Complaints

Beyond Intermediary Services Institute undertakes to ensure that:

- where a complaint is upheld, any commitment by Beyond Intermediary Services to make a compensation payment, goodwill payment or to take any other action will be carried out without undue delay and within any agreed timeframes.

- where a complaint is rejected, Beyond Intermediary Services will provide the complainant with clear and adequate reasons for the decision and inform the complainant of any applicable escalation or review processes, including how to use them and any relevant time limits.

11. Complaints Escalation and Review Process

11.1. The FSP will use the following process for the escalation and review of complaints:

- Should a complaint relate to product features or services handled solely by a product supplier, this matter will be escalated and appropriately dealt with in conjunction with the product supplier, ensuring that the matter is resolved to the satisfaction of the complainant.
- Whenever a complaint is escalated ensure that:
  - A balanced approach is followed, bearing in mind the legitimate interests of all parties involved including the fair treatment of clients
  - Internal escalation of complex or unusual complaints at the instance of the initial complaint handler is provided for;
  - Clients may escalate complaints not resolved to their satisfaction
  - the escalation is allocated to an impartial, senior functionary within the provider or appointed by the provider for managing the escalation or review process of the provider.
- Ensure that procedures within the complaints escalation and review process are not overly complicated or impose unduly burdensome paperwork or other administrative requirements on complainants (clients).
- Document all areas of interaction and communication.
- Ensure accurate, efficient, and secure recording of complaints and complaints-related information.
- In respect of each reportable complaint, keep a record of:
  - All relevant details of the complainant and the subject matter of the complaint;
  - Copies of all relevant evidence, correspondence, and decisions;
  - The complaint categorization;
  - The progress and status of the complaint, including whether such progress is within or outside any set timelines;
- Concerning reportable complaints categorised on an ongoing basis record the number of complaints:
  - Received,
  - Upheld,
  - Rejected and their reasoning,
  - Escalated by complainants (clients) to the internal complaints escalation process,
  - Referred to an Ombud and their outcomes;
  - and amounts of Compensation payments made,
  - and amounts of goodwill payments made,
  - the total number of complaints outstanding.
- Ensure complaints information recorded is scrutinised and analysed on an ongoing basis and utilised to manage conduct risks and effect improved outcomes and processes for clients, and to prevent recurrences of poor outcomes and errors.
- Obtain consent from the complainant to ensure that no personal information is divulged or processed without the complainant's knowledge or consent.

Keep the complainant appropriately updated on the progress of the investigation.

11.2 The Complaints Manager is responsible for managing the escalation and review process of complaints.

11.3 Complaints may be escalated and/or reviewed in the following instances:

- Where the complaint is of a complex or unusual nature. In such an instance the initial complaint handler may escalate the complaint.
- Complainants may escalate complaints that were not resolved to their satisfaction (Complainants must be notified of this).

12. Record keeping, monitoring and analysis

12.1 Beyond Intermediary Services will follow the process below for: record keeping, monitoring and analysing of complaints.

Beyond Intermediary Services must ensure accurate, efficient and secure recording of complaints and complaints related information. The Complaints Management Framework Register is to be used to record complaints and related information.

The following must be recorded in respect of each reportable complaint:
- all relevant details of the complainant and the subject matter of the complaint,
- copies of all relevant evidence, correspondence, and decisions,
- the complaint categorisation,
- progress and status of the complaint, including whether such progress Is within or outside any set timelines.

Beyond Intermediary Services must maintain the following data, on categorised reportable complaints, on an ongoing basis:

- number of complaints received,
- number of complaints upheld,
- number of rejected complaints and reasons for the rejection,
- number of complaints escalated by complainants to the Internal complaints escalation process,
- number of complaints referred to an ombud and their outcome,
- number and amounts of compensation payments made,
- number and amounts of goodwill payments made,
- total number of complaints outstanding.

Complaints Information that has been recorded, must be scrutinised and analysed by the Compliance Department on an ongoing basis. Beyond Intermediary Services must use this information to manage conduct risks and implement improved outcomes and processes for its clients, and to prevent recurrences of poor outcomes and errors.

12.2. The monitoring and analysis of complaints will be reported by the Compliance Department to the FSP's Key Individual on a monthly basis. The report will include:

- Information on the categorisation of complaints.
- What risks have been identified since the last report.
- What trends have been identified.
- What actions could be taken to manage risks and implement improved outcomes.

12.3. The FSP will keep records of these reports, monitor changes and consider whether the Complaints Management Framework may need to be adapted in response to the findings.

12.4. Responsible person/s

The Complaints Manager will be responsible for the recordkeeping requirements.

The Key Individual and Compliance Department will be responsible for the monitoring requirements.

The Complaints Department and the Compliance Department will be responsible for the analysis requirements.

13. Communication with Complaints

Beyond Intermediary Services will ensure that:

- Its complaint processes and procedures are transparent, visible and accessible through channels that are appropriate to the provider's clients.
- It does not impose any charge for a complainant to make use of complaint processes and procedures.
- All communications with a complainant will be in plain language.
- Wherever feasible, it will provide clients with a single point of contact for submitting complaints.
- The following information is disclosed to a client:
  - the type of Information required from a complainant.
  - where, how and to whom a complaint and related information must be submitted.
  - expected turnaround times in relation to complaints.
  - any other relevant responsibilities of a complainant.
- Within a reasonable time after receipt of a complaint, it will acknowledge receipt thereof and promptly inform a complainant of the process to be followed in handling the complaint including:
  - contact details of the person or department that will be handling the complaint.
  - indicative and, where applicable, prescribed timelines for addressing the complaint.
  - details of the internal complaints escalation and review process if the complainant is not satisfied with the outcome of a complaint.
  - details of escalation of complaints to the office of a relevant ombud and any applicable timeline.
  - details of the duties of the provider and rights of the complainant as set out in the rules applicable to the relevant ombud.
- Complainants will be kept adequately informed of:
  - the progress of their complaint
  - causes of any delay in the finalisation of a complaint and revised timelines, and
  - the FSP's decision in response to the complaint.

14. Engagement with Ombud and reporting

Beyond Intermediary Services must:

- Should there be a complaint raised by the Ombud, it is of utmost importance that the matter is raised and communicated to the Key Individual of Beyond Intermediary Services.
- The Key individual, or a designated department will request relevant information pertaining to the complaint raised by the Ombud from the Complaints Manager in order to obtain records, root cause, complaint management framework register, exchange of previous communications regarding the complaint if possible and any other relevant information that could be obtained.
- Once the investigation has completed within the time frame specified by the Ombud, the Key Individual will provide feedback to the Ombud with all evidence that may be helpful to resolve the complaint.
- At all times, the Ombud contact details will be communicated to clients clearly and transparently at all relevant staged of

the relationship with a client.
- Display and/or make available information regarding the availability and contact details of the relevant Ombud services, at the premises and/or on the company website.
- Maintain specific records and carry out specific analysis of complaints referred to Beyond Intermediary Services by the Ombud and the outcomes of such complaints.
- Monitor determinations, publications, and guidance issued by any relevant Ombud to identify failings or risks in their policies, services, or practices.
- Maintain open and honest communication and co-operation between itself and any Ombud with whom it deals; and
- Endeavour to resolve a complaint before a final determination or ruling is made by an Ombud, or through the business' internal escalation process, without impeding or unduly delaying a complainant's access to an Ombud.

15. Important Contact Details

Beyond Intermediary Services

Post: Private Bag X3, Bryanston, 2021
Email: info@beyondinsurance .co.za
Telephone: 010 036 4033

Guardrisk Life Limited

Post: PO Box 786015, Sandton, 2146
Telephone: 011 669 1000
Email: complaints@guardrisk.co.za

The Ombudsman for Long-term Insurance

Post: Private Bag X45, Claremont, 7735
Telephone: 021 657 5000 / 086 010 3236
Fax: 021 674 0951
Email: info@ombud.co.za

The Financial Sector Conduct Authority (FSCA)

Post: PO Box 35655, Menlo Park, 0102
Telephone: 012 428 8000
Fax: 012 346 6941
Email: info@fsca.co.za

The FAIS Ombudsman

Post: PO Box 74571, Lynnwood Ridge, 0040
Telephone: 012 762 5000
Fax: 012 348 3447
Email: info@faisombud.co.za