

**Complaints Resolution Policy**  
**Viva Cover (Pty) Ltd (“Viva Cover”)**

<b>Table of contents</b>	<ol style="list-style-type: none"> <li>1. Purpose of the policy</li> <li>2. Policy statement</li> <li>3. Definition of a complaint</li> <li>4. Submitting your complaint</li> <li>5. Our complaints procedure</li> </ol>
<b>Definitions/abbreviations</b>	Complaint
<b>Policy ownership and review</b>	<p><b>Policy approval and review roles</b></p> <p>Policy administrative roles</p> <ul style="list-style-type: none"> <li>• Policy Owner: Chanel Haak</li> <li>• Policy approvers: Compliance Officer</li> <li>• Document owner: Wayne Sales</li> </ul> <p><b>Review and approval schedule</b></p> <p>The complaints resolution policy must be reviewed each year by the Risk and Compliance Committee (“RCC”)</p>
<b>Policy control</b>	<p><b>Control history</b></p> <ol style="list-style-type: none"> <li>1. Complaints Resolution Policy v2.0 – DRAFT for RCC to review and comment</li> </ol>
<b>Objective of the policy</b>	The purpose of the Complaint Resolution policy is to inform clients of how they can make use of our complaints resolution system, to their advantage.
<b>Principles of Policy</b>	<p>The policy should set out:</p> <ul style="list-style-type: none"> <li>• The roles and responsibilities of those affected</li> <li>• What reporting and governance structures are required</li> </ul>
<b>Scope of application</b>	All Viva Cover staff, representatives and clients
<b>Roles and responsibilities</b>	<ul style="list-style-type: none"> <li>• It is the role of the RCC to set the Complaints Resolution Policy</li> <li>• It is the role of the RCC ultimately to ensure the Policy is being followed</li> <li>• It is the role of the Head of Operations and the compliance officer to track and manage the process.</li> </ul>
<b>Policy standards and/or requirements</b>	Regular MIS is required to monitor whether the policy is being upheld.

**COMPLAINTS RESOLUTION POLICY FOR  
VIVA COVER (PTY) LTD (“Viva Cover”)  
FSP number: 42787**

**1. Purpose of this policy:**

We are a licensed Financial Services Provider with the authority to provide financial advice and intermediary services in terms of the Financial Advisory and Intermediary Services Act although we only provide intermediary services. As such we have certain specific duties to you, our clients. One of these duties is to offer you a formal complaints resolution system, which will enable you to exercise your rights as provided for in the Financial Advisory and Intermediary Services Act. The purpose of this document is to inform you of how you can make use of our complaints resolution system, to your advantage.

**2. Policy Statement:**

Viva Cover is committed to providing its clients with quality service and undertakes to manage the affairs of its clients in such a way that it would not be necessary to have a complaint about our service, integrity and commitment. However should it happen that a client does have a complaint, we undertake to:

- 2.1 Resolve client complaints in such a way that is fair to our clients, our FSP and our staff;
- 2.2 We undertake to inform all our clients of the procedures established for the internal resolution of their complaints, details of which will be given to them in writing;
- 2.3 We undertake to ensure easy access to our complaints resolution process at our offices, or by way of post, e-mail or telephone;
- 2.4 Empower and properly train our people to deal with complaints, as well as with the escalation of complaints;
- 2.5 If necessary, appoint an independent mediator to resolve the complaint to the benefit of both the client and our FSP;
- 2.6 Deal with complaints in a timely and fair manner, with every complaint receiving proper consideration in a process that is managed appropriately and effectively by the responsible staff member;
- 2.7 Offer appropriate remedy in all cases where a complaint is resolved in favour of a client;
- 2.8 Inform clients of their right to refer their complaints to the FAIS Ombud, should a complaint not be resolved to their satisfaction within six weeks from the date on which the complaint is received
- 2.9 Maintain records of all complaints received for a period of 5 years, which will specify the outcome of all the complaints lodged
- 2.10 If so required, implement follow-up procedures to:
  - (a) Implement remedial actions to prevent similar complaints from occurring
  - (b) Improve services and procedures where necessary

**3. Definition of a complaint:**

Complaint means a specific complaint relating to a financial service rendered to the client on or after the 30th of September 2004, being the commencement of FAIS, alleging that the FSP:

- 3.1 Contravened or failed to comply with a provision of FAIS and that, as a result, the client has suffered or is likely to suffer financial prejudice or damage;
- 3.2 Willfully or negligently rendered a financial service to the client which has caused prejudice or damage to the client, or which is likely to result in such prejudice or damage; or
- 3.3 Treated the client unfairly

The complaint must not be about the investment performance of the product unless the financial performance was guaranteed or the financial performance was so deficient that it creates the presumption that there has been misrepresentation, negligence or mal-administration.

#### 4. Submitting a complaint

PLEASE	THEN	OR	PLEASE NOTE
Give us a chance to resolve the matter. To ensure our focused attention, please use the following contact details:	If complaints about our service are not resolved, we are accountable to the FAIS Ombud. Their contact details are as follows:	If complaints about our products don't get resolved, we are accountable to the Short-Term Insurance Ombud. Their contact details are:	We are also accountable to the Long-Term Insurance Ombud. Their details are:
<b>Viva Cover Postal address</b> Postnet Suite 33, Private Bag X75, Bryanston, 2021	<b>Office of the FAIS Ombud</b> PO Box 74571, Lynnwood Ridge, 0040	<b>Ombudsman for Short-Term Insurance</b> Private Bag X 32334, Braamfontein, 2017	<b>Ombudsman for Long Term Insurance</b> Private Bag X45 Claremont 7735
Call: 086 109 529 Email: <a href="mailto:complaints@vivacover.co.za">complaints@vivacover.co.za</a> <a href="http://www.vivacover.co.za">O.za</a> Fax: 086 154 9541	Call: 0860 324 766 Email: <a href="mailto:info@faisombud.o.za">info@faisombud.o.za</a> Fax: +27 12 348 3447	Call: 011 726 8900 Email: <a href="mailto:info@osti.co.za">info@osti.co.za</a> Fax: +27 11 726 5501	Call: 0860 103 236 Email: <a href="mailto:info@ombud.co.za">info@ombud.co.za</a> Fax: 021 674 0951

If any of our representatives:

- 4.1 did not comply with the Financial Advisory and Intermediary Services Act and you suffered financial prejudice as a result;
- 4.2 intentionally or negligently gave financial advice or rendered an intermediary service to you which caused prejudice or damage, or is likely to cause damage;
- 4.3 treated you unfairly, you must please submit the complaint in writing and forward it to our complaints department.

Please include the following details with your complaint:

- (a) Your name, surname and contact details;
- (b) A complete description of your complaint;
- (c) The name of the person who provided you with financial advice or an intermediary service;
- (d) The date on which the matter complained about occurred;
- (e) All documentation relating to your complaint;
- (f) How you would prefer to receive communication from us regarding your complaint i.e. by e-mail, fax and post. Please provide us with the e-mail address, fax number or address where you would prefer to receive such communication.

#### 5. Our Complaints Procedure:

- 5.1 As soon as we receive your complaint, we will send you an acknowledgement of receipt. Please take into consideration that the method of communication chosen by you will determine how quickly we will receive and respond to your complaint.

- 5.2 We will investigate and attempt to resolve your complaint to your satisfaction within 6 weeks of receipt of your complaint.
- 5.3 If we are unable to resolve your complaint within 6 weeks, or we are unable to resolve the complaint to your satisfaction, you have the right to refer your complaint to the FAIS Ombud or to either the Ombudsman for Short-Term Insurance, or the Ombudsman for Long-Term Insurance, who has been appointed specifically for this purpose.

Please remember however that you must refer the complaint to the Ombud within 6 months from the date of the notice in which we inform you that we cannot resolve the complaint to your satisfaction.

## **6. Risk and Compliance Committee Approval**

The Risk and Compliance Committee has approved the Viva Cover Complaints Resolution Policy.