

Internal Complaints Resolution Policy and Procedure (Short-Term Insurance Business – South Africa)

1. Purpose and Regulatory Context

Credora Financial Services (Pty) Ltd (“Credora”) is committed to delivering financial services with integrity, transparency, and accountability.

As stated in the original policy, “Credora is committed to rendering financial services with integrity, transparency, and accountability.”

This Complaints Management Framework (“the Framework”) is established in compliance with:

- FAIS Act, 2002
- FAIS General Code of Conduct – Section 17
- Policyholder Protection Rules (PPR), 2017 – Rule 18
- FSCA Treating Customers Fairly (TCF) Outcome 6
- POPIA
- Any directives or reporting requirements issued by the FSCA

The Framework ensures that Credora maintains a fair, transparent, accessible, and effective process for receiving, categorising, investigating, resolving, and reporting complaints.

2. Definitions

2.1 Complaint

A complaint is any expression of dissatisfaction—whether justified or not—submitted by a complainant relating to a financial service or policy provided by Credora or its service providers, alleging that:

- Credora or its service provider contravened a law, rule, agreement, or code of conduct;
- Credora or its service provider’s maladministration, negligence, or error caused prejudice, harm, distress, or inconvenience; Credora or its service provider treated the complainant unfairly.
- This aligns with the original definition:

2.2 Complainant

In line with PPR Rule 18.2 and FAIS GCOC Section 17, a complainant includes:

- A current or former policyholder or client;
- A person who pays a premium or any person acting on behalf of such a person;
- A policyholder’s spouse, dependent, beneficiary, or successor in title;
- A potential policyholder whose dissatisfaction relates to advertising, marketing, solicitation, or application processes;
- Any person who submits a complaint to a service provider to the knowledge of Credora.

This expands the original wording, which included “current or former client... spouse, dependent or beneficiary, potential client” but omitted premium payers and successors.

3. Governance and Oversight

In accordance with PPR Rule 18.2–18.4 and FAIS GCOC Section 17(4):

3.1 Board of Directors

The Board is responsible for:

- Approving the Complaints Management Framework;
- Overseeing its implementation and effectiveness;
- Ensuring adequate resources, training, and systems;

- Receiving regular complaints reports and trend analyses.

3.2 Key Individuals

Responsible for:

- Ensuring compliance with FAIS and PPR requirements;
- Monitoring performance standards;
- Ensuring conflicts of interest are avoided or mitigated.

3.3 Complaints Officer

Responsible for:

- Receiving, logging, acknowledging, and tracking complaints;
- Ensuring communication with complainants is clear and timely.

3.4 Complaints Manager

Responsible for:

- Conducting investigations;
- Performing root-cause analysis;
- Recommending corrective action;
- Ensuring fair outcomes.

3.5 Staff Remuneration and Conflicts of Interest

- Complaints handling staff may not be incentivised based on complaint outcomes.
- Remuneration must not create conflicts of interest.
- Staff must operate independently and objectively.

4. Guiding Principles

Credora commits to:

- Fairness, accessibility, and transparency;
- Confidentiality and POPIA compliance;
- Objective and timely investigation;
- No unreasonable barriers to lodging complaints;
- Continuous improvement based on complaint insights.

This aligns with the original principle:

5. How to Lodge a Complaint

Complaints may be submitted via:

- Email: complaints@credora.co.za
- Post/Delivery: 194 Bancor Avenue, Colab Building, Menlyn Maine, Pretoria
- Telephone: 012 881 4580 (verbal complaints will be reduced to writing)

Complaints should include:

- Policy or claim number;
- Description of dissatisfaction;
- Supporting documents;
- Preferred contact details.

No fee is charged.

6. Complaints Categorisation (Taxonomy)

Required under PPR Rule 18.5.

Credora will categorise complaints at minimum into:

1. Product design / policy terms
2. Advice-related complaints
3. Intermediary service complaints
4. Claims handling / repudiation
5. Premium administration / billing

6. Service provider conduct
7. Tied to advertising, marketing, or disclosure
8. Fraud, misrepresentation, or unethical conduct
9. Complaints relating to TCF outcomes

Additional categories may be added based on business model and emerging trends.

7. Complaints Handling Process

Step	Action	Responsible	Timeframe
1	Complaint received, logged, acknowledged	Complaints Officer	Within 24 hours
2	Complaint allocated for investigation	Key Individual	Within 48 hours
3	Investigation & root-cause analysis	Complaints Manager	5–10 working days
4	Findings & proposed resolution	Management	Within 15 working days
5	Written outcome communicated	Complaints Officer	
6	Internal escalation (if requested)	Senior Management	Within 15 days
7	External escalation (NFOSA)	Client / Credora	Within 6 months

8. Internal Escalation & Review Process

Required under PPR Rule 18.6 and FAIS GCOC Section 17(5).

A complainant may request:

- Internal review by a senior manager not involved in the original decision;
- Reassessment where new evidence becomes available;
- Escalation to the Key Individual or Board Committee (where appropriate).

Credora must:

- Inform complainants of internal escalation options;
- Provide timelines and contact details;
- Ensure independence and fairness in the review.

9. Decisions and Communication Requirements

In line with PPR Rule 18.7 and FAIS GCOC Section 17(7)–(8):

9.1 Decision Types

- Upheld (wholly or partially)
- Rejected (with reasons)
- Goodwill settlement

9.2 Written Outcome Must Include

- Clear reasons for the decision;
- Details of any redress or corrective action;
- Internal escalation options;
- External escalation rights and time limits;
- NFOSA contact details.

This strengthens the original wording:

10. External Escalation – NFOSA

Credora must provide complainants with details of the National Financial Ombud Scheme: National Financial Ombud Scheme of South Africa (NFOSA)

✉ info@nfosa.co.za

🌐 www.nfosa.co.za

This replaces OSTI and FAIS Ombud references.

11. Record-Keeping and Reporting

In line with PPR Rule 18.8 and FAIS GCOC Section 17(8):

Credora will maintain complaint records for five years, including:

- Complainant details;
- Policy/claim numbers;
- Category of complaint;
- Dates received, acknowledged, and resolved;
- All evidence and correspondence;
- Decision and reasons;
- Amounts paid (compensation/goodwill);
- Whether escalated internally or externally;
- Final outcomes.

11.1 Reporting

Credora will:

- Submit any prescribed reports to the FSCA;
- Provide regular complaints reports to the Board;
- Maintain statistics on volumes, trends, root causes, and TCF outcomes.

12. Review of the Framework

The Framework will be reviewed annually or sooner if:

- Regulatory changes occur;
- FSCA directives require amendments;
- Complaint trends indicate systemic issues.

This expands the original statement:

13. Contact Details

Credora Financial Services (Pty) Ltd

FSP No. 43148

194 Bancor Avenue, Colab Building, Menlyn Maine, Pretoria

Tel: 012 881 4580

Email: complaints@credora.co.za

Office Hours: Monday–Friday 08:00–16:30