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13 Baker Street,  
Rosebank, 2196, Johannesburg  
P.O. Box 2730, Houghton,  
2041, South Africa

## COMPLAINTS MANAGEMENT POLICY

### BACKGROUND

In terms of Leppard Underwriting's ("Leppard") Treating Customers Fairly (TCF) policy as well as the Financial Sector Conduct Authority's Policyholder Protection Rules (PPR), Leppard is committed to rendering financial services honestly, fairly, with due skill, care and diligence, and in the interests of its clients, and the general integrity of the financial services industry. One of the instruments to achieve this aim is a Complaints Management Policy, in order to address any perceived poor service by Leppard. This Complaints Management Policy therefore seeks to achieve compliance with the aims of Leppard's own vision, the PPR and TCF principles.

### OBJECTIVE OF POLICY

The purpose of this Policy is to:

- Formalize the procedure for the lodging of complaints by clients of Leppard who are dissatisfied with the financial service rendered by Leppard and to ensure that the procedure is accessible to all clients;
- Enable Leppard to effectively manage and resolve complaints relating to the financial service rendered by it to its clients;
- Enable Leppard to identify and analyse trends and areas of concern in the rendering of its financial service and thereby to ensure that appropriate interventions are put in place at the earliest possible opportunity;
- To ensure that processes are in place to familiarise staff with the appropriate way of dealing with complaints; and
- To ensure that senior management endorse and support the fair, objective and transparent management of complaints and the procedures set out in this document.

### DEFINITIONS (as per the PPR)

**A complaint is:** An expression of dissatisfaction relating to a financial product sold or marketed or financial service of Leppard which alleges that Leppard has:

- (a) treated the client unfairly, or
- (b) prejudiced the client through poor administration, deliberate or negligent acts; or
- (c) failed to comply with an agreement with the client; or
- (d) failed to comply with any applicable law, rule or code of conduct which Leppard is bound by or subscribes to.

Leppard considers the following laws and codes to be applicable in this context (paragraph (d) above): the FAIS Act, FAIS General Code of Conduct and Fit & Proper Regulations, the Insurance Act and the Policyholder Protection Rules as well as the FIA/SAUMA/SAIA Code of Conduct.

The complaint can be lodged by someone representing the client or even by someone Leppard has marketed to and includes an individual member of any scheme business Leppard writes.

All complaints must be handled in accordance with this policy. However, some issues are of such a nature as to be able to be speedily resolved; thus any complaint received and resolved to the clients' satisfaction within five days will not be considered as necessary to report on and will be captured as a "query" in Leppard's complaints management system.

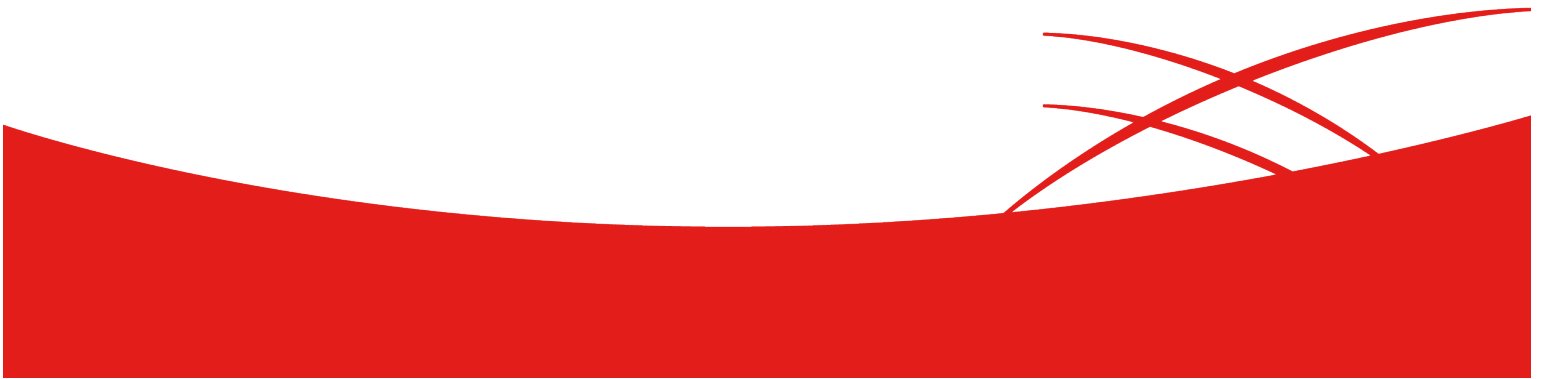
## **RESPONSIBILITIES**

Leppard has appointed Jan Dijkman as the primary person to investigate and resolve any complaints.

Jan Dijkman through his position as Leppard's compliance consultant has appropriate access to the necessary records and sufficient authority to investigate and recommend decisions to resolve complaints. Additionally, he has the necessary experience, knowledge and skills in complaints handling, TCF, Leppard's products and services and the legislative framework.

Leppard does not remunerate Jan Dijkman in relation to any outcome or number of complaints.

Leppard will ensure that no cases of conflict of interest arise in the handling of complaints. Should any person handling a complaint determine that they are in a conflicted position then an alternate person will take over the role in that investigation.



## CATEGORISATION OF COMPLAINTS

Any complaints received will be recorded in Leppard's complaints management system. Leppard will categorise complaints as follows in the complaints management system:

- 1) Query (i.e. a complaint that is resolved within five days)
- 2) Flawed design of the financial product or service (including fees and premiums)
- 3) Information provided
- 4) Advice related
- 5) Financial product or service performance
- 6) Client service (including premium collection and lapsing)
- 7) Product accessibility, changes or switches (including investment redemptions)
- 8) Complaints handling
- 9) Claims (including non-payment of claims)
- 10) Other.

## COMMUNICATION WITH COMPLAINANTS

Leppard is committed to a transparent and accessible complaints process. As such Leppard will:

- Never charge complainants to submit complaints;
- Ensure all communications are in plain language; and
- Provide each complainant with a single contact point for their complaint.

Where to submit a Complaint


On Leppard's website: [www.leppard.co.za](http://www.leppard.co.za)

By e-mail: [complaints@leppard.co.za](mailto:complaints@leppard.co.za)

By post: P O Box 2730, Houghton, 2041 (for attention of Jan Dijkman)

By hand: Leppard and Associates (Pty) Ltd (for attention of Jan Dijkman) 13 Baker Street, Rosebank, 2196, Johannesburg,

To ensure Leppard handles complaints fairly Leppard will request the complainant to provide the following information in writing via the email address/online complaints portal (details above):

- The policy number of the policy in question,
  - The details of the individual who initially dealt with the client (if applicable),
  - An explanation of the client's complaint,
- 

- An explanation of the client's expectation from Leppard, and
- Copies of any relevant documents at the client's disposal.

#### **INTERNAL COMPLAINTS HANDLING PROCESS**

Upon receipt of the complaint Leppard will act as follows:

- Assign the complaint to Jan Dijkman;
- ↓ Jan Dijkman will email acknowledgement of receipt of the complaint within 24 hours of the business day that it is received and confirm their contact details and that further correspondence will be provided within 48 hours, {Draft Letter 1}
- ↓ Jan Dijkman will request information from relevant parties within 48 hours of receipt of the complaint,
- ↓ Jan Dijkman will assess and investigate all the information provided in respect of the complaint within a further 24 hours,
- ↓ Jan Dijkman will contact the complainant to inform them of the progress and request any further information within 72 hours of initial formal receipt of the complaint. Should a resolution or rejection be proposed at this point the details of the internal escalation process and relevant Ombuds' details and all parties' responsibilities will be provided in this correspondence should the complaint be with their jurisdictions (see details below). {Draft Letter 2}
- ↓ Should it not be possible to propose a resolution or rejection with 72 hours, the above step shall inform the complainant of the reason for the delay and note that Leppard will investigate further and provide further feedback within two weeks. The internal escalation process will be provided in this correspondence. {Draft Letter 2}
- ↓ Jan Dijkman will request and review any further information necessary,
- ↓ Should it not be possible to propose a resolution or rejection within the two weeks, Jan Dijkman will inform the complainant of the reason for the delay, inform the complainant that Leppard will continue to investigate further and provide final resolution within four weeks, {Draft Letter 2}
- ↓ Jan Dijkman will request and review any further information necessary,
- ↓ After consultation with the directors of Leppard, Jan Dijkman will propose a resolution or rejection of the complaint.
- ↓ Should any complaint be rejected the correspondence will include the details of the internal escalation process and relevant Ombuds' details and all parties' responsibilities. {Draft Letter 2}

Any further extensions to these timeframes is at the discretion of Glenn Standen, Leppard's Managing Director. In such cases he will liaise with the complainant directly.

## ESCALATION AND REVIEW

Should a complaint not be resolved by the initial complaints handler it will be escalated to an impartial, senior functionary within Leppard. Similarly, should a complainant wish to escalate a complaint beyond the initial complaints handler it will also be escalated to an impartial, senior functionary within Leppard.

When reviewing any complaint, the complaints handler will ensure they take a balanced and fair approach to ensure the interests of all parties are addressed. Should they be unsure they will liaise with their immediate manager who may then escalate the claim to [Our MD] should they see fit to do so.

## DECISIONS:

Where Leppard commits to any payment in regard to any complaint Leppard will make the payment within 5 business days or the within the number of days as agreed with the complainant.

Where Leppard rejects a complaint Leppard will provide the complainant with clear and adequate reasons for the decision as well as the options they have to take the issue further and the applicable time limits as described in Leppard's complaints handling process above and encapsulated in Leppard's draft letters.

The details of the relevant Ombuds' and Adjudicators' offices are as follows:

**The Insurance Ombudsmans** office incorporates both the Ombudsman for Short-term Insurance as well as the Ombudsman for Long-term Insurance. Therefore, if the complaint is against the insurer (Lombard Insurance Company Ltd) it must be lodged with the **Ombud for Short-Term Insurance**, who can be contacted through the following:

Telephone: 0860 103 236 or 0860 726 890

Website: [www.insuranceombudsman.co.za](http://www.insuranceombudsman.co.za)

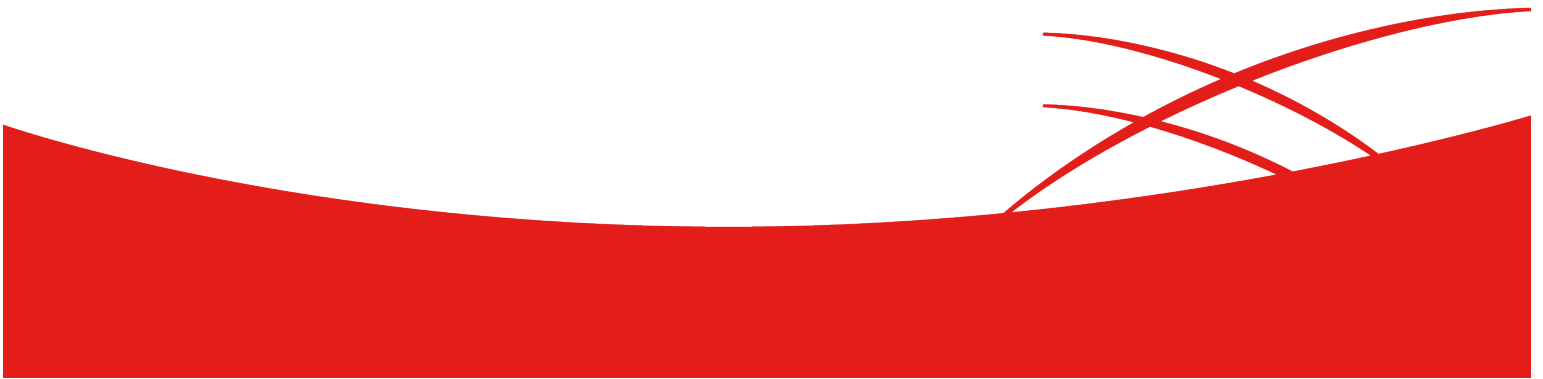
Email: [info@insuranceombudsman.co.za](mailto:info@insuranceombudsman.co.za)

Physical address: Sunnyside Office Park, 5th Floor, Building D, 32 Princess of Wales Terrace, Parktown.

Jurisdiction limits - Short-term: R 3.5 million for general complaints excluding homeowners, R 6.5 million for homeowners, complaint cannot be under litigation or under contemplation of litigation with an attorney, a complaint regarding a claim cannot have exceeded the prescription period of the Prescription Act, 1969.

## The FAIS Ombud

If the complaint is against the intermediary (Leppard or your broker) it must be



lodged with the **FAIS Ombud**. A complaints registration form may be downloaded from the FAIS Ombud's website ([www.faisombud.co.za](http://www.faisombud.co.za)) or obtained from the FAIS Ombud:

Telephone: 012 762 5000 or 012 470 9080

Website: [faisombud.co.za](http://faisombud.co.za)

Physical address: Sussex Office Park, Ground Floor, Block B, 473 Lynnwood Road, Cnr Lynnwood and Sussex Avenue, Pretoria, 0081

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

Jurisdiction limits: Complaints must be in regard to events occurring on or before 30 September 2004, limited to R 800 000, complaint cannot be under litigation or under contemplation of litigation with an attorney, in terms of the FSOS Act the FAIS Ombud may not deal with a complainant who has a net asset value, annual turnover, or annual income of more than R 8 million.

#### **RECORDS OF COMPLAINTS:**

Leppard understands the importance of accurate and reliable information regarding complaints and will ensure that it is kept securely as part of Leppard's record keeping procedures and policy.

Leppard's complaints management system records the following information in terms of all complaints:

- 1) Name, applicable policy number and contact details of the complainant and their representative,
- 2) Copies of all relevant evidence, correspondence and decisions,
- 3) The category of the complaint,
- 4) Status of the complaint,
- 5) Date stamps of actions including interactions with complainants.

Leppard's complaints management system enables Leppard to draw the following information:

- 1) Number of complaints received,
- 2) Number of complaints decided in favour of the client (in part or completely),
- 3) Number of complaints rejected,
- 4) The reasons for rejected complaints,
- 5) Number of complaints escalated by complainants,
- 6) Number of complaints referred to an Ombud,
- 7) Results of complaints referred to an Ombud,
- 8) Number of compensation payments made (i.e. where Leppard was at fault),
- 9) Amount of compensation payments made,
- 10) Number of goodwill payments made (i.e. where Leppard was not at fault but choose to resolve the complaint in this manner),

- 11) Amount of goodwill payments made,
- 12) Number of complaints outstanding.

This information will be sent to Glenn Standen, Leppard's Chief Executive Officer at the beginning of the second week of every month.

As part of Leppard's ongoing efforts to enhance Leppard's services, the Leppard EXCO and Board will review the complaints information at each of their meetings (7 times a year) and take any rectifying action they feel is necessary.

This information enjoys the protections of Leppard's POPIA policy.

#### **ENGAGEMENT WITH THE OMBUD:**

Leppard is aware of the vital role the various Ombuds and Adjudicators play in creating fair outcomes for policyholders, intermediaries and providers in the financial services industry. As such Leppard's engagement with their offices and representatives will always be honest, professional and transparent.

To ensure Leppard's clients have access to the Ombuds, the details of those relevant to Leppard's business are included in Leppard's disclosure document which is provided to our clients and on our website. As noted in this document Leppard will also provide the information to complainants during the complaints process.

Should a complainant approach the Ombud directly and not inform Leppard of their complaint Leppard will follow the procedures as prescribed by the relevant Ombud in dealing with their complaint.

Leppard receives regular updates via the websites of the FAIS Ombud ([www.faisombud.co.za](http://www.faisombud.co.za)) and Insurance Ombuds ([www.insuranceombudsman.co.za](http://www.insuranceombudsman.co.za)). The cases are reviewed by Jan Dijkman each month to determine if there are any possible adjustments to Leppard's business.

#### **TRAINING:**

Leppard undertakes to create awareness and understanding of the Policy by –

- Distributing the Policy amongst its staff;
- Including reference to the Policy in the HR Policies and Practices document;
- Providing adequate training regarding the Policy to all staff;
- Ensuring that the Policy is accessible to all staff at any time.

#### **REVIEW:**



This Policy will be reviewed in the event of any legislative changes necessitating such review or alternatively annually in December and reissued if necessary.

- The purpose of the annual review will be to –
  - monitor the effectiveness of the Policy and to adapt the Policy where it seems to have been ineffective;
  - monitor internal compliance with and awareness of the Policy;
  - refine the processes and procedures in the Policy where necessary;
  - ensure compliance with applicable legislation.

*Last updated November 2022*





**{Draft Letter 1}**

[Individual/Company Name]

[Postal Address]

[Suburb]

[City]

[Postal Code]

Dear [Individual/Company Name],

Complaint Regarding Policy Number [?]

We acknowledge receipt of your complaint submitted on [Date].

We are currently investigating the circumstances and will attempt to resolve it as soon as possible. Please note that we endeavour to resolve all complaints within 72 hours of receipt of all the information relating to the complaint but dependent on the circumstances it may take up to six weeks to do so. We will inform you of progress of the investigation as often as possible.

Should you have any further information or have any questions please contact me.

Yours sincerely,



**{Draft Letter 2}**

[Individual/Company]  
[Postal Address]  
[Suburb]  
[City]  
[Postal Code]

Dear [Individual/Company Name]

**Complaint Regarding Policy Number [?]**

We are writing to confirm the status of your complaint submitted on [Date].

(a) Thank you for the information provided previously, it has been most useful. Please note that we require the following information to be able to continue with our enquiries:

[??]

Please provide it as soon as possible to enable us to resolve your complaint as quickly as possible.

(b) After careful consideration we are pleased to inform you that we are able to resolve your complaint in your favour and would propose we [pay you/[Company] R ??? as appropriate redress of your complaint. / resolve your complaint by ???]. Please confirm if this is acceptable and we will carry out the payment/resolution as soon as possible.

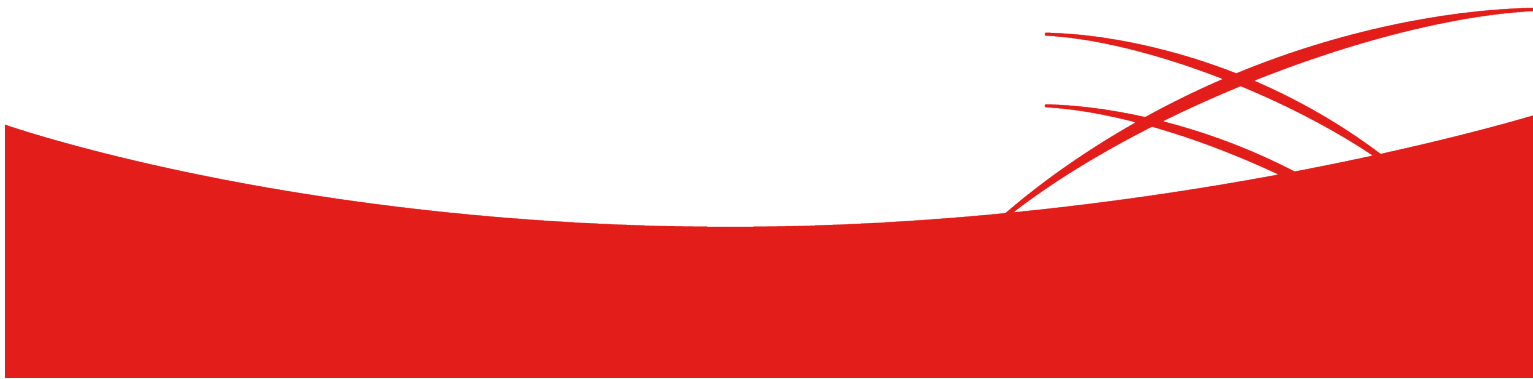
Should you not be satisfied with the resolution proposed please let us know and we will escalate this issue to [Our MD] immediately.

(c) After careful consideration of your complaint, regrettably we are unable to resolve it in your favour.

[Reason for rejection of complaint]

You have the option of lodging a complaint with the FAIS Ombud or the Insurance Ombudsman's office within six months of this letter. You also have the right to pursue any other avenue of law, should you wish to do so.

The FAIS Ombud deals with complaints regarding the intermediary (Leppard or your broker)



The FAIS Ombud

Telephone: 012 762 5000 or 012 470 9080

Website: [faisombud.co.za](http://faisombud.co.za)

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

The Insurance Ombudsmans office incorporates both the Ombudsman for Short-term Insurance as well as the Ombudsman for Long-term Insurance and can be contacted through the following:

Telephone: 0860 103 236 or 0860 726 890

Website: [www.insuranceombudsman.co.za](http://www.insuranceombudsman.co.za)

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

Yours sincerely,

