

# Complaints Management Framework

Innovation Group South Africa

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PREPARED BY: Customer Service

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## Revision history

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1.1	Approved	01 April 2021	Customer Service	Annual review
1.2	Approved	06 May 2021	Customer Service	Update resolution TAT
1.3	Approved	11 July 2022	Customer Service	Annual review and update of TAT
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1.5	Approved	04 June 2024	Customer Service	Annual review and Updating Ombuds Complaints details
1.6	Approved	11 July 2025	Customer Service	Annual review, updating complaints classification and Ombuds complaints details for Non-regulated products.

## Sign-off

Version	Date	By	Title	Signature
1.6	18 July 2025	B. Mariga	GM Customer Operations	
1.6	28 July 2025	K. Kruger	Executive Operations	

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## 1. Purpose

This framework outlines the principles and processes for effective complaints management at Innovation Group South Africa. It is aligned with global best practices and is underpinned by the Treating Customers Fairly (TCF) principles

## 2. Scope

The framework promotes a culture of compliance and stakeholder engagement. It applies across all legal entities of Innovation Group including:

- Innovation FSP (Pty) Ltd
- Innovation Group Distribution (Pty) Ltd
- Innovation Risk Services (Pty) Ltd
- Innovation Group Services (Pty) Ltd

## 3. Principles

The aim is guided by the following principles:

- Customer Focus
- Accessibility and Transparency
- Responsiveness
- Alignment with TCF Outcomes and Policyholder Protection Rules
- Continuous Learning and Improvement
- Risk Awareness and Mitigation

## 4. Definitions

### Complaint

An expression of dissatisfaction made to a service provider, relating to a policy or service offered, regardless of whether it is submitted alongside a policyholder query.

### Complainant:

A person who submits a complaint, including:

- A policyholder or their successor in title
- A beneficiary or their successor in title
- A premium payer
- A prospective customer dissatisfied with marketing, advertising, or sales practices.
- A representative acting on behalf of any of the above

### Policyholder Query

A request for information or action related to a policy or service, submitted by or on behalf of a policyholder.

## 5. Allocation of responsibilities

Individuals responsible for handling or making decisions on complaints must:

- Be adequately trained in complaints handling.
- Possess relevant knowledge, experience, and skills.
- Understand customer fairness, complaint subject matter, and applicable legal/regulatory frameworks.
- Be free from conflicts of interest.
- Be sufficiently authorised to make impartial decisions or recommendation.

## 6. Complaints Handling Approach

The complaints handling process follows a structured, customer-centric approach:

### 6.1. Receive and Acknowledge

Upon receipt of a complaint, the complainant is promptly acknowledged. The process is explained to manage expectations. Acknowledgement times vary by communication channel.

### 6.2. Gather Information

Relevant information is collected to assess and resolve the complaint. The complainant is informed of any additional documentation or input required.

### 6.3. Resolve or Escalate

Based on the nature of the complaint, it is either resolved within the Complaints Function's mandate or escalated to the appropriate department.

### 6.4. Review and Decide Solution

Decisions are made in alignment with TCF principles, ensuring fairness to the complainant and mitigating reputational risk to the organisation.

### 6.5. Feedback and Areas of Concern

Once resolved, the outcome is communicated clearly to all stakeholders. Any systemic issues or areas of concern are flagged for further action.

### 6.6. Corrective Action

Relevant stakeholders are required to implement corrective actions or process enhancements based on the complaint outcome.

### 6.7. Continuous Improvement

Complaint insights are shared across departments to drive continuous improvement and enhance the overall customer experience.

## 7. Complaints Escalation and Review

The complaints process includes a formal escalation and review mechanism to ensure fairness and transparency:

- All complaints are reviewed impartially, with due consideration for the interests of all parties involved.
- Complex or exceptional complaints are escalated internally for further review.
- Complainants may escalate unresolved complaints for further investigation.
- Clear communication is maintained with complainants or their authorised representatives throughout the process.
- The framework is reviewed annually to ensure continued relevance and effectiveness.

## 8. Decisions

Complaint outcomes are determined based on a range of factors, including policy terms, fairness, and regulatory compliance.

### 8.1. Rejected Complaints:

A complaint is considered rejected when it is not upheld and is deemed finalised by the administrator or insurer. Reasons for rejection include:

- **Invalid:** The complainant fails to respond within 7 days, does not provide required documentation, or cannot be reached via available contact methods.
- **Unjustified:** The complaint lacks merit, policy terms have been met, and no further action is possible.

### 8.2. Upheld Complaints:

A complaint is upheld when resolved wholly or partially in favour of the complainant:

- **Wholly Upheld:** The outcome fully supports the complainant's position.
- **Partially Upheld:** A mutual resolution is reached between the complainant and the service provider.

Types of resolutions include:

- **Compensation Payment:** Monetary or service-based compensation for proven financial loss due to service failure or regulatory breach.
- **Payment Contractually Due:** A justified claim where the complainant should have received assistance from the outset.
- **Payment Not Contractually Due:** A discretionary payment made due to poor handling or negligence, such as refunding premiums.
- **Goodwill Payment:** A voluntary payment made in exceptional circumstances, even if the policy does not cover the issue.

## 9. Complaints Channels and Response Times

The framework ensures accessibility across multiple customer touchpoints. All communication is conducted in plain language and during business hours (08:00–16:30, Monday to Friday).

Table 9.0: Channel and Response Times

CHANNEL	DESCRIPTION	RESPONSE TIME
Phone call	Complaint logged at point of contact when complainant called	Immediate
Social media	Logged via: <ul style="list-style-type: none"> <li>Facebook</li> <li>Hello Peter</li> <li>Twitter</li> </ul>	30 minutes
Innovation Group website	Logged via Innovation Website	30 minutes
Email	Email sent to complaints mailbox	60 minutes

## 10. Complaints Classification

Complaints are categorised into two primary types:

- **Service Complaints:** Relating to the quality, timeliness, or delivery of services.
- **Sales Complaints:** Relating to the sales process, advice, or marketing practices.

Each complaint is further aligned to the Treating Customers Fairly (TCF) outcomes:

**TCF Outcome 1** – Customers must feel confident that they are dealing with an institution where TCF is at the core of their culture.

**TCF Outcome 2** – Products and services in the retail market which are sold and marketed are designed according to the needs of the customers identified and targeted accordingly.

**TCF Outcome 3** – Customers are provided with clear information and kept appropriately informed before, during and after point of sale.

**TCF Outcome 4** – Advice is suitable and according to the customer's circumstances.

**TCF Outcome 5** – Service is of an acceptable standard and products perform as customers have been led to expect.

**TCF Outcome 6** – Customers do not face unreasonable post-sale barriers when they want to change a product, switch providers, submit a claim or make a complaint.

## 11. Complainant Responsibilities

To ensure an effective and fair complaints process, complainants are expected to:

- Provide all relevant and accurate information when lodging a complaint.
- Understand that complex complaints may require additional time to resolve, and that they will be kept informed of progress throughout the process.

## 12. Reporting of Complaints both Regulated and Non- Regulated.

Complaints data is reported on a weekly, monthly, quarterly, and annual basis to relevant departments. These reports are used to:

- Identify trends and areas for improvement.
- Drive training, coaching, and disciplinary actions where necessary.
- Enhance processes and customer experience.

The complaints process is supported by an internal quality framework that includes regular assessments and coaching to address identified issues.

Legal and Ombudsman Complaints are analysed in detail, and proactive measures are implemented to prevent recurrence.

For Regulated products, if a complainant is dissatisfied with the outcome, they may escalate the matter to the National Financial Services Ombud Scheme (NFOSA). Innovation Group does not impose any barriers to this escalation.

National Financial Services Ombud Scheme of SA (NFOSA)

Postal address: PO Box 74571, Lynwood Ridge, 0040.

Tell: 0860 800 900

Fax: 011 388 8250

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

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

For Non-Regulated products, if a complainant is dissatisfied with the outcome, they may escalate the matter to the Ombudsman for Financial Service Providers (FAIS Ombud), and for matters relating to Repairs/Mechanics/ Panel beaters and Dealerships, they may escalate to the Motor Industry Ombudsman of South Africa (MIOSA). Innovation Group does not impose any barriers to this escalation.

Ombudsman for Financial Service Providers (FAIS Ombud),

Postal address: PO Box 41, Menlyn Park, 0063.

Tel: 012 762 5000

Share call: 086 066 3274.

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

Motor Industry Ombudsman of South Africa (MIOSA)

Postal address: PO BOX 32334 Braamfontein, 2017.

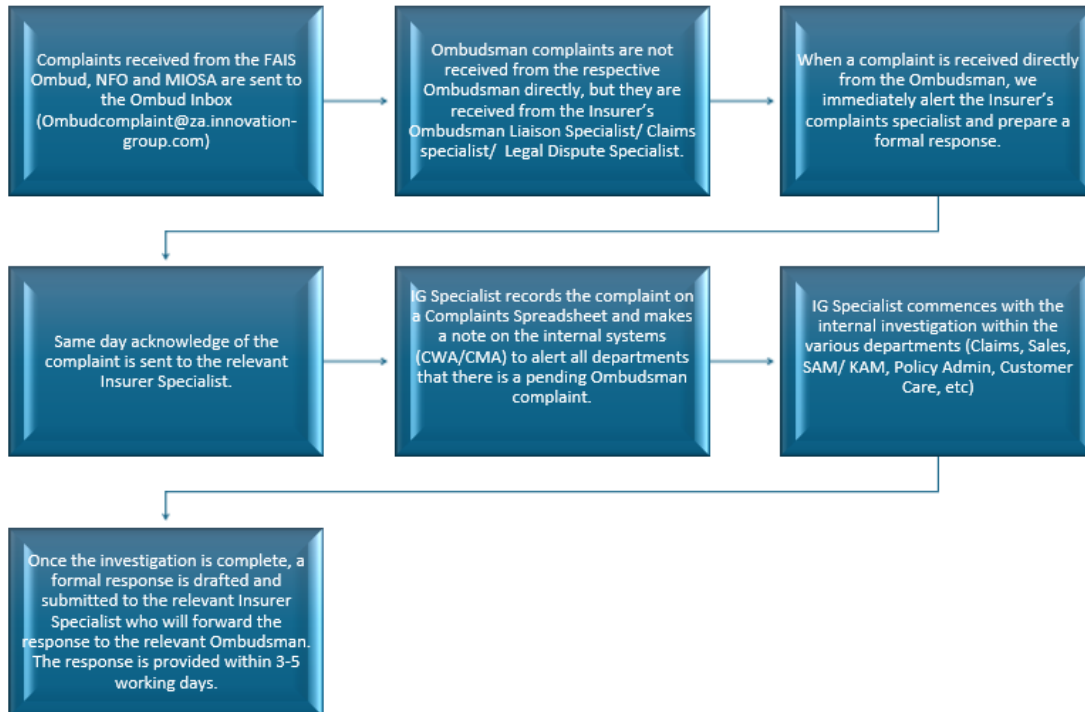
Tel: 010 590 8378

Fax: 086 630 6141

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



### 13. Ombudsman Process



## 14. Record keeping

All complaints are logged in a centralised complaints management system, providing a single view across all departments. This ensures:

- Consistent tracking and resolution
- Accurate reporting
- Compliance with regulatory requirements