



Complaints Management Framework

Compass Insurance Company Limited (Compass Insure)

Purpose of the Complaints Management Framework

To provide for the mechanism and process that will enable our customers to escalate dissatisfaction that will be dealt with in accordance with the guidelines and standards set out herein. And to improve organisational effectiveness through learning from client feedback and root cause analysis.

Key Drivers underpinning this Complaints Management Framework

Our board of directors remain ultimately responsible for the implementation, management and monitoring of an effective complaints management process.

Compass Insure is committed to:

- establish, maintain and operate a robust complaints management framework to ensure the effective resolution of complaints and the fair treatment of complainants;
- prioritise complaints to ensure a speedy resolution in an open and transparent manner;
- ensure objectivity by the complaints handling staff in attending to and resolving a complaint;
- ensure consistent delivery of high-quality responses to complaints and insurer accountability;
- analyse complaints to enable us to take measures in eradicating areas of risk and to avoid a recurrence of similar problems;
- align the complaints process with the overall regulatory requirements.

Submitting a complaint

Complaints to be submitted to the Compliance Officer, within Compass Insure, via email: compass-complaints@compass.co.za or by telephone: 011 745 8333.

Complaint resolution procedure

- The complaint will be lodged in our complaints register on the same day that it is made and an acknowledgement of receipt sent to the complainant, within 2 working days, of receipt. The acknowledgement of receipt to the complainant will include the contact details of the person that will be handling the complaint and expected timelines.
- All complaints will be investigated and resolved in a fair, timeous and professional manner and feedback will be provided to the complainant within 10 working days of the date of receipt of the initial complaint - provided that all information required has been provided and/or an investigation has been completed.
- In cases where further information, assessment or investigation is required, agree with the complainant on a reasonable timeframe not exceeding 25 working days of receipt of the complaint.
- A written response will be sent to a complainant or their authorised representative once the complaint is finalised.
- Where a complaint is upheld, any commitment to make a compensation payment, goodwill payment or to take any other action will be carried out without undue delay and within agreed timeframes.
- Where a complaint is rejected, the complainant will be provided with clear and adequate reasons for the decision and be informed of the escalation or review process, including how to use it and any relevant time limits.

Process of managing complaints relating to outsourced business partners

- Each outsourced business partner must establish and adhere to a claims management framework to ensure claims handling and complaints are dealt with in a prompt, professional, efficient and effective manner.
- Where an outsourced business partner has a policy, process or procedures, guide or training manual relating to complaints management, all such documents must comply with, and not contradict, this complaints management framework.
- Outsourced business partners and service providers to ensure complainants face no unreasonable post-sale barriers.
- Unresolved complaints at the outsourced business partner, including dissatisfaction expressed by the client (or the representative on behalf of the client) with the manner in which the claim or complaint was handled, must be escalated to Compass Insure without delay. All correspondence and any information pertaining to the matter must be submitted, in writing, to the Compliance Officer at Compass Insure.
- Each outsourced business partner will have adequate complaints management processes in place to ensure the accurate recording of all complaints and to submit complaints data to the Compliance Officer at Compass Insure, as prescribed and in the format required, that would allow the Compliance Officer to analyse, aggregate and categorise complaints data as prescribed in Rule 18 of the Policyholder Protection Rules.
- The Compliance Officer at Compass Insure will aggregate and analyse complaints reports received from outsourced business partners on a monthly basis. Findings on identified risks, trends and actions taken will be contained in market conduct reports that are presented to executive management and the board.

Quality assurance

The effectiveness of our complaints management processes are underpinned by the following key principles:

- The person, responsible for the investigation and adjudication of the complaint, will:
 - be adequately trained;
 - have an appropriate mix of experience, knowledge and skills in complaints handling, fair treatment of customers, the subject matter of the complaint concerned and relevant legal and regulatory prescripts;
 - not be subject to a conflict of interest;
 - be adequately empowered to make impartial decisions or recommendations;
 - without delay inform the applicable business partners of the complaint to obtain their input thus allowing Compass Insure to conduct the investigation in an open and transparent manner, where possible, without compromising the investigation.
- Complaint reports will be scrutinised and analysed on an ongoing basis and used to manage conduct risk and improve outcomes to policyholders. Where necessary, corrective action will be implemented to prevent similar complaints.
- Findings on identified risks, trends and actions taken will be contained in market conduct reports that are presented to executive management and the Board.
- Regular performance reviews and audit assessments will be conducted to ensure Compass Insure and its outsourced business partners adhere to the principles and processes contained in the complaints management framework as well as the requirements set down by the authorities.