

COMPLAINTS POLICY

Purpose of our Complaints Policy

In terms of the General Code of Conduct, Genesis EB Solutions (Pty) Ltd must maintain an internal complaints resolution procedure in the event that a client complains about a financial service rendered by Genesis EB Solutions (Pty) Ltd or a Representative of the Genesis EB Solutions (Pty) Ltd.

Genesis EB Solutions (Pty) Ltd complaints procedure will be based on the following outcomes:

- **Transparency and Visibility:**

Ensuring that complainants have full knowledge of the procedures that will be followed when submitting a complaint.

- **Accessibility of Facilities:**

Ensuring that clients are provided with an easily accessible facility in order to submit a complaint at any of our offices or branches.

- **Fairness:**

Ensuring that the complaint resolution process is fair to both a complainant and Genesis EB Solutions (Pty) Ltd.

In order to achieve the above-mentioned outcomes Genesis EB Solutions (Pty) Ltd has adopted a complaints policy outlining our commitment towards the fair resolution of complaints.

Complaints must be in writing

In order for a complaint to receive the attention that it deserves, we request that your complaint be submitted to us in writing. Please ensure that where the complaint is delivered by hand or by any other means, you obtain and keep proof of delivery.

Procedure to follow

Our internal complaints resolution process is intended to provide fair and effective resolution of complaints. The time periods set-out in this procedure will be adhered to as strictly as possible but may be varied if necessary.

The following step-by-step guideline sets out the procedures we will adopt and shows how a complaint will be dealt with, once received by us:

- ❖ Your complaint and all communications in connection with your complaint must be in writing. All verbal communications made in connection with the complaint must be confirmed in writing.
- ❖ Please indicate the following information:

- Your name, surname and contact details;
 - A complete description of your complaint and the date on which the financial service that led to your complaint was rendered;
 - The name of the person who furnished the financial advice or rendered the intermediary service that led to your complaint and
 - How you would prefer to receive future communications regarding your complaint i.e. by e-mail, fax or post.
- ❖ The complaint will be entered into our Complaints Register, and written confirmation of receipt will be forwarded to you. We will keep record of the complaint and maintain such record for 5 years as required by legislation. Please take into consideration that the method of communication chosen by you will determine how quickly we will respond to your complaint.
- ❖ The complaint will immediately be drawn to the attention of the Senior Manager in charge of the relevant department for allocation to a trained and skilled person who is able to properly respond to your complaint.
- ❖ The complaint will be investigated, and we will revert to you with our preliminary findings within a **legislatively accepted period** from the date of receipt of the complaint. In all instances we will advise you of the reasons for our decisions.
- ❖ The preliminary findings will be discussed with all internal parties concerned, and a proposed solution will be communicated to you within a **legislatively accepted period**. In all instances we will advise you of the reasons for our decisions.
- ❖ If you are not satisfied with our solution, you may refer the complaint to the Compliance Officer of our business. The Compliance Officer may amend the solution or confirm it. Please be informed that certain decisions may have to be approved by the Management Committee of Genesis EB Solutions (Pty) Ltd. In such a case we will communicate that fact to you, as well as the date on which a decision will be taken.
- ❖ If, after having referred the complaint to the Compliance Officer, you are still not satisfied with the outcome, we will regard the complaint as being unsatisfactorily resolved. In such a case, you may approach the office of the Ombud for Financial Services Providers or other related Ombuds or Legal Representatives.
- ❖ The FAIS Ombud is appointed by the Financial Sector Conduct Authority to act as an adjudicator in disputes between Clients and Financial Services Providers. The referral to the office of the Ombud must be done in accordance with the provisions of section 21 of the Financial Advisory and Intermediary Services Act 2002 and the rules promulgated in terms of that section.

- ❖ In instances where we have not been able to arrive at a resolution **within six weeks** after you have submitted your complaint, the matter may automatically be referred to the FAIS Ombud or other related Ombuds or Legal Representatives. The Ombud acts independently and objectively and has jurisdiction in respect of complaints relating to advice or intermediary services, which has arisen after 15 November 2002.
- ❖ You must, if you wish to refer a matter to the Ombud, do so **within six months** from the date of the notice in which we inform you that we are unable to resolve the complaint to your satisfaction. The Ombud will not adjudicate in matters exceeding a value of R800 000.

See required contact details on next page.

Name:	Mrs Amanda Turi	Mr Naresh Suresh Tulsie	Mr Sipho Kabane	Ms.Muvhango Antoinette Lukhaimane	JudgeRon McLaren
Title:	Compliance Officer	FAIS Ombud	Registrar of Medical Schemes	Pension Funds Adjudicator	Ombudsman for Long-term Insurance
Postal Address:	P O Box 522801 Saxonwold 2132	PO Box 74571 Lynwood Ridge 0040	Private Bag X34 Hatfield 0028	P.O. Box 580 Menlyn 0063	Private Bag X45 Claremont Cape Town 7735
Physical Address:	27 Fricker Road, Illovo, Johannesburg, 2196	Sussex Office Park Ground Floor, Block B 473 Lynnwood Road Cnr Lynnwood Road & Sussex Ave, Lynnwood, 0081	Block A, Eco Glades 2 Office Park420 Witch - Hazel Avenue, Eco Park, Centurion, 0157	4th Floor Riverwalk Office Park Block A, 41 Matroosberg Road Ashlea Gardens, Pretoria, 0181	Third Floor, Sunclare Building, 21 Dreyer Street, Claremont, Cape Town, 7700
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Website	www.gencapital.co.za	www.faisombud.co.za	www.medicalschemes.com	www.pfa.org.za	www.ombud.co.za

Internal Complaint Escalation and Review Process

Genesis EB Solutions (Pty) Ltd is committed to ensuring that the procedures within the complaints escalation and review process is not overly complicated and does not impose unduly burdensome paperwork or other administrative requirements on Complainants.

The internal complaint escalation and review process:

- ❖ as specified previously, is allocated to Senior Manager, who is an impartial, senior functionary within the organisation, and is appointed by the organisation in order to manage the internal escalation and review process.
- ❖ Where a complaint has been received or where a client has indicated his, her or its intention to submit a formal complaint with the Genesis EB Solutions (Pty) Ltd, the following procedure will be followed:
 - ✓ Review Genesis EB Solutions (Pty) Ltd Complaints Procedure and furnish the Complainant with a copy of the procedure.
 - ✓ Where the Complainant has previously communicated the grievance verbally, instruct the Complainant to resubmit the complaint in writing.
 - ✓ As soon as the complaint is received in writing, proceed to record the complaint in the Genesis EB Solutions (Pty) Ltd.'s Complaints Register.
 - ✓ Provide the Complainant with written acknowledgement of receipt of the complaint within a legislatively accepted period.
 - ✓ Inform the Senior Manager in charge of the relevant department for allocation to a trained and skilled person who is able to respond to the complaint.
 - ✓ The Senior Manager will investigate the complaint and review the file/transaction which gave rise to the complaint.
 - ✓ The Senior Manager will discuss his or her preliminary findings with all internal parties concerned.
 - ✓ Revert to the Complainant with preliminary findings and request supporting documents and/or additional information from the Complainant where necessary within **a legislatively accepted period**. In all instances provide reasons for any decisions taken and communicate any anticipated deviation from the specified timelines.
 - ✓ Where necessary the matter will be referred to the relevant Product Supplier for a response and the Complainant will be informed of this development.
 - ✓ The Senior Manager will, in consultation with the Management Committee formulate a joint response to the complaint. Where deemed necessary an Independent Mediator will be appointed.
 - ✓ Revert to the Complainant with a proposed solution with the option of escalating the matter to the Managing Director of the business **within fourteen working days** of receipt of the complaint. In all instances provide reasons for any decisions taken and communicate any anticipated deviation from the specified timelines.

- ✓ Where the complaint has not been resolved to the satisfaction of the Complainant, the Senior Manager must inform the Complainant of his, her or its right to escalate matter to the Ombud **within 6 weeks** from date of receipt.
- ✓ The Compliance Officer must update the status of the complaint (once information has been received from the Senior Manager) in the Genesis EB Solutions (Pty) Ltd.'s Complaints Register and file all relevant correspondence for a period of 5 years.
- ✓ If during the course of the enquiry, the Compliance Officer becomes aware that the complaint is of a non-routine or serious nature, the following steps will apply:
 - The Compliance Officer will make a recommendation on how to proceed with the complaint. The Compliance Officer's response may suggest that the matter be referred to the Ombud for adjudication or that the matter be referred for an opinion from an attorney and if so, the attorney's opinion will be sought.
 - The Compliance Officer must review the Genesis EB Solutions (Pty) Ltd.'s Professional Indemnity Cover policy wording and inform the relevant insurers of the complaint and potential claim.
 - Review the reasons that gave rise to the complaint and implement remedial actions in order to avoid and prevent similar complaints in the future.
- ❖ Where a complaint is *upheld*, any commitment by Genesis EB Solutions (Pty) Ltd to make a compensation payment, goodwill payment or to take any other action must at all times be carried out without undue delay and within the agreed timeframes.
- ❖ Where a complaint is *rejected*, Genesis EB Solutions (Pty) Ltd will provide the Complainant with clear and adequate reasons for the decision, as well as suggest that the matter be referred to the Ombud for adjudication or that the matter be referred for an opinion from an attorney and if so, the attorney's opinion will be sought.

Comments and Suggestions

We always welcome comments and suggestions on how to improve our services. If we are not performing up to our Client's expectations in facilitating the resolution of an issue he/she has raised, he/she is most welcome to inform us.