Insurancewise Complaints Resolution Systems and Services (Pty)Ltd

FSP 32023

Insurancewise 'Treating Customers Fairly' (TFC') policy

Introduction

Insurancewise recognises that the fair treatment of customers is not a separate or occasional obligation, but a permanent feature of how a responsible financial services business should be conducted. In practical terms, this means fairness should be visible in the way products are selected and presented, the way advice is given, the way service is rendered after sale, and the way complaints, claims and client concerns are handled when something goes wrong.

The Treating Customers Fairly approach was developed (2011) to address a longstanding imbalance between financial institutions and ordinary customers. Financial institutions typically hold greater expertise, greater resources and greater access to information than the clients who must decide whether a financial product is suitable, affordable and aligned to their needs. In many cases the consequences of a poor decision or an unfair process are not immediately visible, but only emerge months or years later, when prejudice is more difficult to reverse

Insurancewise accepts that fairness must therefore be built into the full client relationship and not limited to the point of sale. A business may communicate politely and still produce unfair outcomes if its product selection is weak, its disclosures are unclear, its incentives are misaligned, its after-sales service is poor, or its complaints processes create unnecessary barriers. For that reason, this policy adopts a broad approach to fairness that applies across the entire product life cycle and across all functions that influence client outcomes.

This policy also aligns with the General Code of Conduct under FAIS, which requires providers at all times to render financial services honestly, fairly, with due skill, care and diligence, and in the interests of clients and the integrity of the financial services industry. It further reflects the Code's requirements

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on clear communication, suitability of advice, avoidance and mitigation of conflicts of interest, appropriate complaints management and fair treatment of clients in all material interactions.

The purpose of this policy is to articulate Insurancewise's internal standard for treating customers fairly, to assign accountability for its implementation, and to establish a cultural and operational framework through which fair customer outcomes can be achieved, measured and maintained over time. The policy is intended to guide directors, key individuals, management, representatives, employees and relevant service providers whose conduct may affect clients of Insurancewise.

Policy purpose and scope

The goal of this policy is to make explicit Insurancewise's commitment to treating customers, prospective customers and complainants fairly throughout the full duration of the relationship. The policy applies before a client contracts with Insurancewise, while advice is being rendered, while a product remains in force, when a client requests changes or service, and where a client wishes to claim, switch, replace, complain or terminate an arrangement.

The policy must be read as a governance document rather than a process manual. It sets the standards and principles that the business must follow. Detailed procedures, operational workflows, scripts, registers, monitoring tools and reporting templates may be created separately to support implementation, but those documents must remain consistent with this policy.

This policy applies to all financial services rendered by Insurancewise within the scope of its licence and mandate, including services delivered through representatives, authorised staff, outsourced functions and service suppliers to the extent that those services affect client outcomes. Where a client outcome is influenced jointly by Insurancewise and a product supplier, or by Insurancewise and another intermediary in the value chain, Insurancewise will not treat divided responsibility as an excuse for inaction. Instead, it will take reasonable steps within its control to promote fair treatment and to challenge product, service or administrative practices that may prejudice clients.

This policy is intended to support, and not replace, existing legal duties arising under FAIS, subordinate legislation, the General Code of Conduct, complaints rules, conflict-of-interest rules and any other applicable market-conduct requirements. Where another binding legal requirement imposes a higher or more specific obligation than this policy, the stricter obligation will apply.

Insurancewise fairness commitment

Insurancewise adopts as its customer fairness standard the principle that clients must experience fair treatment as an ordinary feature of the business and not only as a remedy after a problem has already arisen. Fair treatment means more than courtesy. It means that client needs are properly considered, advice is suitable, information is understandable, products perform as clients were reasonably led to expect, and post-sale assistance is accessible and effective.

Insurancewise accordingly commits itself to the following fairness outcomes in substance:

- Clients must be confident that they are dealing with a firm in which fair treatment is central to the culture of the business.
- Products and services recommended or marketed through Insurancewise must be appropriate for identified customer groups and targeted accordingly.
- Clients must receive clear information before, during and after contracting, in language and format they can reasonably understand.

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- Where advice is given, that advice must be suitable and must take proper account of the client's needs and circumstances.
- Clients must receive products and associated service that perform as they were reasonably led to expect.
- Clients must not face unreasonable barriers when they need information, want to change a product, submit a claim, raise a complaint or seek redress.

Insurancewise regards these outcomes as interconnected. A failure at one stage of the relationship often causes unfairness at a later stage. A product that is badly targeted, a disclosure that is poorly explained, or an incentive structure that over-emphasises sales volumes may later produce complaints, claims disputes, lapses or loss of trust. This policy therefore requires a joined-up view of client fairness rather than a narrow focus on isolated incidents.

Culture and governance

Insurancewise accepts that fair customer outcomes cannot be achieved by compliance staff alone. The responsibility for fair treatment begins with leadership and must be embedded in the business culture, strategic direction, governance structures, decisions, controls, monitoring practices and remuneration arrangements of the firm. The board, governing body, key individuals and senior management must set the tone that fair treatment of customers is a non-negotiable business standard. They must ensure that fairness considerations are taken into account in decision-making and that the commercial objectives of the business are not pursued in a manner that undermines client interests.

Insurancewise will maintain governance and control arrangements that support this commitment, including:

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- clear allocation of responsibility for TCF oversight and implementation:
- appropriate reporting lines for identified conduct risks, complaints trends, service failures and recurring client issues;
- escalation mechanisms for matters that may materially affect clients or indicate systemic unfairness;
- internal controls designed to support compliance with FAIS, the General Code and this policy;
- regular management consideration of fairness outcomes when reviewing products, service models, administrative practices, replacement activity, complaint data and claims experience.

Insurancewise further recognises that culture is shaped by what an organisation rewards, tolerates and ignores. For this reason, performance management and incentive structures must not encourage representatives or staff to prioritise volume, speed, retention or specific product preference at the expense of suitable advice and fair client outcomes. Where remuneration or incentive structures are used, they must give due regard to measurable indicators relating to service standards, fair outcomes and quality of compliance, as required by the Code.

Product life cycle approach

Insurancewise adopts a life-cycle approach to fair treatment. Fairness must be present from initial client engagement and product consideration through to after-sales servicing, claims, complaints and termination or replacement activity.

Product selection and targeting

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Where Insurancewise recommends or facilitates access to financial products, it must take reasonable steps to understand the nature, purpose, key features, risks, charges, exclusions and target market of the product concerned. A product must not be recommended merely because it is available, convenient or commercially attractive. Appropriate consideration must be given to whether the product is capable of serving the identified needs and objectives of the relevant client group.

Although product design rests primarily with product suppliers, Insurancewise recognises that intermediaries still have a duty to exercise product judgment responsibly. Representatives may not abdicate responsibility for an unsuitable recommendation by claiming that product design is solely the supplier's concern. An appropriate level of product due diligence is expected, especially where complexity, cost, exclusions, post-sale friction or recurring client dissatisfaction suggest heightened conduct risk

Marketing and communication

All information, representations and communications provided by Insurancewise to clients or prospective clients must be factually correct, in plain language, adequate in the circumstances and not misleading.[f

Communications must be provided timeously so that a client has a reasonable opportunity to make an informed decision.

Insurancewise will not promote a product or service in a way that exaggerates benefits, obscures limitations or minimises risk. Comparisons between financial products, product suppliers, providers or representatives may only be made where the differing characteristics are properly disclosed, and inaccurate, unfair or unsubstantiated criticism is prohibited. This reflects not only legal compliance, but also the broader fairness principle that clients should not be influenced by distorted or incomplete impressions.

Advice and suitability

Where advice is rendered, Insurancewise representatives must exercise objective judgment in the interest of the client concerned and must consider the client's needs, circumstances, objectives and risk profile to the extent required by law and the nature of the service. Advice must be suitable, properly motivated and capable of being explained in a manner the client can understand.

Insurancewise recognises that suitable advice is one of the central expressions of fair treatment. Advice is unfair if it is driven by product preference, conflicted incentives, incomplete fact-finding, poor explanation, or the omission of material limitations, costs or alternatives that the client reasonably needs to understand.

Point of sale and contracting

Insurancewise must provide clients with clear and fair information to enable informed decision-making. Product risks, commitments, exclusions, waiting periods, charges, premium consequences, replacement implications and other material features must be disclosed with sufficient clarity to avoid misunderstanding.

Where products are bundled, layered or accompanied by loyalty benefits, premium-back features or related services, the components and cost implications must be explained so that the client understands what is being purchased and on what terms. Clients must not be rushed into decisions through artificial urgency, incomplete disclosure or pressure-based conduct.

After-sales and ongoing information

Insurancewise accepts that fairness continues after contracting. Clients must receive ongoing information and service sufficient to help them understand their product position, request assistance, maintain cover where appropriate, and assess whether the product continues to meet their expectations and needs.

Administrative friction, unexplained delays, poor responsiveness, unclear service channels and failure to assist with reasonable requests can all create unfair post-sale outcomes even where the original advice was sound. Insurancewise will therefore maintain service standards and communication practices designed to support clients throughout the life of the product and to ensure that service quality reflects what clients were reasonably led to expect.

Complaints, claims and post-sale barriers

Insurancewise recognises that a well-run complaints framework is one of the clearest indicators of whether a firm truly treats customers fairly. The absence of complaints does not necessarily prove fairness, just as the presence of a complaint does not by itself establish wrongdoing. What matters is whether concerns are accessible, properly recorded, fairly investigated, timeously addressed and used to improve future outcomes.

Insurancewise must maintain and operate an adequate and effective complaints management framework that is proportionate to the nature, scale and complexity of its business and risks, appropriate to its business model, and designed to ensure both the effective resolution of complaints and the fair treatment of complainants. The framework must not impose unreasonable barriers on complainants.

In line with this commitment:

- complaints processes must be visible, accessible and free of charge to the complainant;
- communications with complainants must be in plain language and must explain the process, contact point, expected timeframes and rights of escalation;
- complaints must be categorised, recorded, monitored and analysed to identify conduct risks, trends and recurring causes;
- decisions must be impartial, adequately reasoned and made by persons with appropriate training, authority and objectivity;
- upheld complaints must be resolved without undue delay and rejected complaints must be accompanied by clear reasons and information regarding escalation or ombud referral rights;
- complaints data must be reported internally to management and used to improve client outcomes and reduce recurrence.

Insurancewise also adopts the broader TCF principle that clients must not face unreasonable post-sale barriers to claims, changes, switches, exits, complaints or access to information. Delays, complexity, excessive paperwork, opaque requirements, unavailable contact points and poor handover between Insurancewise and service providers can all create unfairness even in the absence of malicious intent.

Staff and representatives must therefore approach post-sale requests with a bias toward reasonable assistance, clarity and timely resolution.

Conflict management and fair judgement

Insurancewise acknowledges that conflicts of interest can distort advice, undermine objectivity and create unfair outcomes for clients if not properly identified, avoided, mitigated and disclosed. A conflict of interest exists where an actual or potential interest may influence the objective performance of obligations to a client or prevent unbiased and fair service in the client's interest.

Insurancewise will maintain a conflict-of-interest management policy as required by section 3A of the General Code. That policy must include mechanisms for identifying conflicts, measures for avoidance and mitigation, disclosure requirements, internal controls, consequences of non-compliance and the treatment of financial interests and ownership interests as prescribed by law.

For purposes of this TCF policy, the practical fairness principle is straightforward. Clients must be able to trust that advice and service are not being steered by undisclosed incentives, product bias or relationships that compromise objective judgment. Insurancewise representatives must therefore:

- exercise judgment objectively where there is a choice of product suppliers or product options;
- avoid or, where avoidance is not possible, mitigate conflicts between the firm or representative and the client;
- disclose material conflicts, relevant ownership interests, non-immaterial financial interests and relevant third-party relationships at the earliest reasonable opportunity;

- avoid remuneration or conduct that gives improper preference to a particular product supplier or product where more than one suitable option exists;
- ensure that any permitted financial interest does not impede the delivery of fair outcomes to clients.

Insurancewise further recognises that conflict management is not only a disclosure exercise. A disclosed conflict may still produce unfairness if the business does not meaningfully address the conduct risk created by the conflict. The test is therefore not whether a disclosure was technically given alone, but whether the firm remained capable of acting fairly and objectively in the client's interest.

Monitoring, management information and reporting

Insurancewise accepts that fair treatment must be demonstrable. It is not enough to state that clients are treated fairly. The business must be able to show, through objective evidence, that it monitors conduct, identifies risks and responds to areas of weakness.

Insurancewise will therefore maintain management information and oversight processes capable of assisting the business to measure and review fair customer outcomes, including where appropriate:

- complaints volumes, categories, causes, outcomes and turnaround times;
- claims-related concerns, repudiation patterns, service delays and recurring client grievances;
- replacement activity, lapses, cancellations and post-sale churn indicators where relevant;
- service standard performance and unresolved client issues;

- compliance findings, file reviews, suitability concerns and conflict-of-interest incidents;
- ombud matters, determinations, guidance and recurring issues raised by external dispute-resolution forums.

This information must not be gathered merely for record-keeping. It must be analysed and used to identify conduct risks, areas of poor client experience and opportunities for improvement. Management and key individuals must receive appropriate reporting on fairness outcomes and must take reasonable action where patterns indicate possible client prejudice, operational weakness or cultural misalignment.

Insurancewise will also review this policy periodically and, where necessary, revise it to reflect legal developments, regulatory expectations, ombud guidance, business changes and lessons arising from complaints, claims and conduct monitoring.

Training, accountability and policy access

Insurancewise must ensure that employees, representatives and, where appropriate, associates or relevant service providers are aware of the contents of this policy and receive appropriate training on its practical application. Training must not be limited to technical knowledge. It should also address client communication, suitability, complaint sensitivity, conflict management, escalation obligations and the relationship between everyday conduct and fair outcomes.

Any person responsible for making decisions or recommendations affecting client outcomes, including complaint decisions, must have an appropriate mix of skill, knowledge, experience and objectivity. This is especially important where decisions may materially affect a client's rights, benefits, access to service or opportunity for redress.

Non-compliance with this policy may result in corrective action, retraining, closer supervision, amendment of incentives or disciplinary action, depending on the seriousness and nature of the breach. Repeated or systemic failure to treat customers fairly will be regarded as a governance and conduct risk, not merely an operational inconvenience.

Insurancewise will make this policy available in appropriate form and ensure that it is accessible to relevant internal stakeholders and, where required or appropriate, available for inspection by clients, regulators, ombuds or other entitled parties.

Conclusion

Insurancewise adopts this policy on the basis that fair treatment of customers is essential to lawful conduct, sound governance and sustainable client trust. The policy is not intended to create a slogan, but a standard of behaviour that must shape how Insurancewise markets, advises, services, resolves problems and governs itself.

In practical terms, this means that every part of the client relationship must be approached with the question whether the outcome is fair, understandable, suitable and capable of being defended not only legally, but ethically and operationally. If that discipline is maintained, Insurancewise will be better positioned to comply with FAIS, to reduce conduct risk, to improve client confidence and to build a business culture in which fairness is central rather than incidental.

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