TRANSPORT
Sector Retirement Fund
Moving Towards A Better Future

# COMPLAINTS MANAGEMENT FRAMEWORK

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| Version number | 01/2022 |
| Policy Sponsor | Legal and Risk |

## APPROVAL PROCESS

| OFFICIAL | NAME | SIGNATURE | DATE |
|---|---|---|---|
| LEGAL AND RISK OFFICER | P. Spantzouris | | 24/11/2022 |
| DEPUTY PRINCIPAL OFFICER | L. Mogopudi | | 24/11/2022 |
| PRINCIPAL OFFICER | J. Letswalo | | 24/11/2022 |

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## 1. PURPOSE AND OBJECTIVES OF THE COMPLAINTS MANAGEMENT POLICY

As the Transport Sector Retirement Fund ("TSRF") values our members and hereby state our commitment to handling all complaints effectively and timeously. We hereby commit to ensure that our members are treated fairly and that through our processes and procedures we ensure that the objective of the TSRF and that fair outcomes is achieved. The purpose of this framework is to ensure the effective functioning of TSRF complaints management policy, process and systems to:

- Describe TSRF complaints management framework to ensure the fair treatment of complainants;
- To inform TSRF staff and stakeholders of the policy, process and systems;
- Support TSRF's member-centric strategy;
- Ensure that complainants are treated fairly and in line with market conduct requirements;
- Resolve complaints as quickly as possible;
- Ensure consistency in resolutions;
- Build a positive relationship with the FSCA and the Office of the Pension Funds Adjudicator;
- To achieve the TCF outcomes, and;
- Comply with regulatory and industry requirements on complaints handling.

The following regulatory framework sets out the requirements for the maintenance of a complaint management framework:

- Pension Funds Act No 24 of 1956
- Financial Sector Regulation Act No 9 of 2017
- Rules of the Transport Sector Retirement Fund
- Treating Clients Fairly Framework

The Financial Sector Conduct Authority ("FSCA") is the market conduct regulator of financial institutions. The FSCA aims to enhance and support the efficiency and integrity of financial markets and to protect financial customers by promoting the fair treatment by financial institutions, as well as providing financial customers with financial education. One way of ensuring fair treatment is through the implementation of a Treating Customers Fairly ("TCF") policy.

There are six TCF Outcomes (principles) that financial services companies need to adhere to:

**Outcome 1**: Customers are confident that they are dealing with firms where the fair treatment of customers is central to the firm culture.
**Outcome 2**: Products and services marketed and sold in the retail market are designed to meet the needs of identified customer groups and are targeted accordingly.
**Outcome 3**: Customers are given clear information and are kept appropriately informed before, during and after the time of contracting.
**Outcome 4**: Where customers receive advice, the advice is suitable and takes account of their circumstances.
**Outcome 5**: Customers are provided with products that perform as firms have led them to expect, and the associated service is both of an acceptable standard and what they have been led to expect.
**Outcome 6**: Customers do not face unreasonable post-sale barriers to change product, switch provider, submit a claim or make a complaint.

This document, in line with TSRF's regulatory universe, summarises TSRF's complaints management policy. This framework and policy is aligned to the objectives stated in TSRF's TCF Policy. In accordance with TSRF's regulatory obligations, it maintains both internal and external complaint resolution procedures, addressing internal and external queries and complaints.

## 2. DEFINITIONS

"**Complainant**" means a person who submits a complaint and includes a –

(a) member or the member's executor or successor in title;
(b) beneficiary of the beneficiary's successor in title;
(c) dependant of the member;
(d) potential member whose dissatisfaction relates to the relevant application, approach, solicitation or advertising or marketing material, who has a direct interest in the fund or service to which the complaint relates, or a person acting on behalf of a person referred to in (a) to (c).

**"Complaint"** means an expression of dissatisfaction by a complainant to TSRF, its service or product provider or any third party with whom TSRF has contracted( collectively referred to as TSRF for the purposes of this definition), relating to a benefit, policy or service provided or offered by TSRF which indicates or alleges, regardless of whether such an expression of dissatisfaction is submitted together with or in relation to a member query, that -

(a) TSRF has contravened or failed to comply with an agreement, a law, a rule, or a code of conduct which is binding on TSRF or one within the regulatory universe applicable to TSRF;
(b) TSRF's maladministration or wilful or negligent action or failure to act, has caused the complainant harm, prejudice, distress or substantial inconvenience; or
(c) TSRF has treated the person unfairly and has failed to ensure that the TCF outcomes are achieved;

**"Member query"** means a request to TSRF by or on behalf of a member, for information regarding TSRF's policies, services or related processes, or to carry out a transaction or action in relation to any such policy or service;

**"Rejected"** in relation to a complaint means that a complaint has not been upheld and the TSRF regards the complaint as finalised after advising the complainant that it does not intend to take any further action to resolve the complaint and includes complaints regarded by TSRF as unjustified or invalid, or where the complainant does not accept or respond to the TSRF's proposals to resolve the complaint;

**"Reportable complaint"** means any complaint other than a complaint that has been –

(a) upheld immediately by the person who initially received the complaint;
(b) upheld within TSRF's ordinary processes for handling member queries in relation to the type of product or service complained about, provided that such process does not take more than five business days from the date the complaint is received;
(c) submitted to or brought to the attention of TSRF in such a manner that TSRF does not have a reasonable opportunity to record such details of the complaint as may be prescribed in relation to reportable complaints; and

**"Upheld"** means that a complaint has been finalised wholly or partially in favour of the complainant and that –

(a) the complainant has explicitly accepted that the matter is fully resolved; or
(b) it is reasonable for TSRF to assume that the complainant has so accepted; and

(c) all undertakings made by TSRF to resolve the complaint have been met or the complainant has explicitly indicated its satisfaction with any arrangements to ensure such undertakings will be met by TSRF within a time acceptable to the complainant.

## 3. COMMITMENT TOWARDS THE FAIR RESOLUTION OF COMPLAINTS

TSRF is committed to rendering financial services with proper due skill and diligence and in the best interests of its members, their dependants and beneficiaries, and the integrity of the financial services/ retirement fund industry. Despite its high standards there may be instances where a member nevertheless prefers to submit a formal complaint against TSRF. In such instances, TSRF will follow the complaints procedure as outlined below.

TSRF is committed towards a transparent and assessable complaints resolution process that is fair to all parties involved. In order to do so, TSRF undertakes as follows:

- To follow the appropriate procedures to submit complaints which will be openly disclosed and made readily available;
- To resolve complaints by means of a practical resolution process that is managed effectively;
- To empower and train all staff to facilitate and resolve complaints;
- To deal with complaints in a timely manner, with each compliant receiving proper due consideration;
- To properly investigate and respond promptly to complaints;
- Where a complaint is resolved in favour of the complainant, to offer the appropriate level of redress to the complainant without delay;
- Where a complaint is not resolved in favour of the complainant, to provide written reasons for the decision and inform the complainant of his/her rights to escalate the complainant to another forum;
- Maintain records of all complaints for a period of 5 years together with an indication of whether or not the complaint has been resolved;
- Investigate, and where necessary, take appropriate action in order to avoid and prevent similar circumstances giving cause to complaint from arising again;

- Ensure that all TSRF's service providers adhere to the aforesaid principles and parameters.

## 4. KEY PRINCIPLES

- A complaint must be submitted in writing, if possible, with the relevant information attached. The complainant must provide valid contact detail to enable TSRF to provide feedback to the complainant. TSRF may request further information to fully respond to a complaint.

- The information provided and the identity of the complainant and any persons who furnish information relating to it, or assisting in an investigation of a complaint, will be kept confidential to the maximum extent possible, consistent with applicable law and fair determination of the complaint.

- Complaints are received, registered and investigated by a duly appointed employee in the TSRF's service providers, who report monthly to the TSRF's Legal and Risk Officer;

- Responses to complaints are presented to the Legal and Risk Officer for review at meetings that will be held twice a month;

- Complaints are reviewed with objectivity and impartiality.

- Members who are dissatisfied with the way in which their retirement fund benefits are managed are able to lodge a formal complaint to the TSRF by writing to the Principal Officer of the TSRF or to its appointed service provider. The Principal Officer may address the complaint immediately or may need to institute an investigation to ascertain the causes that led to the complaint. Where necessary, the Principal Officer will refer the complaint to the Board of Trustees for consideration.

If the TSRF's response deems to be unsatisfactory, or the TSRF fails to address the complaint, the member has the right to refer the case to the Pension Funds Adjudicator. There is no charge to lodge a complaint with the Adjudicator's Office.

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| Postal: | P O Box 651826, Menlyn, 0063 |
| E-mail address: | enquiries@pfa.org.za |

Tel: 012 346 1738/ 012 748 4000
Fax: 086 693 7472

- TSRF's acknowledgement of and responses to the complainant is made in writing and sent to the complainant either via SMS, post, e-mail, or telephone depending on the communication method preferred by the complainant, as soon as possible on receipt thereof. This is usually done within one working day of receipt of the complaint.

- TSRF's complaints resolution procedure is published on the TSRF's website. Should a complainant not have access to the internet, a copy of the document can be e-mailed or collected from an office of the TSRF, details of which are on the website.

- Under no circumstances may a representative, staff member or service provider attempt to rectify a complaint in a personal capacity by monetary or other means.

## 5. COMPLAINT CHANNELS

Complaints can be submitted in the following ways and TSRF strives not to impose any unreasonable barriers to submitting complaints. TSRF's complaints process and procedures are transparent, visible and accessible through channels that are appropriate to our members, their dependants and beneficiaries. No charges are imposed on complainants to make use of TSRF's complaints processes or procedures. Complaints are received at a single point of contact for client complaints: complaints@salteb.co.za.

Complaints are received through the following channels:

**Members Directly:**
Members report complaints in person at a TSRF branch, in writing or telephonically to TSRF. The member can be provided with a copy of the Complaints Management Framework complaints on request. This document explains TSRF's complaints handling procedure and timelines.

**Social Media:**
When a complaint is identified on this platform, it is reported to the TSRF's service provider appointed to manage complaints. The complainant is encouraged to divert the complaint

through one of our standard complaint channels. The complaint follows the normal complaints process.

**TSRF website (www.tsrf.co.za)**
Members can submit complaints online on our website. The complaint follows the normal complaints process.

**Service providers:**
Members can submit complaints with a TSRF service provider. Service providers are required to send complaints to TSRF to resolve through its complaints management framework.

## 6. COMPLAINT CATEGORISATION

TSRF categorises complaints according to nine (9) main complaints categories and appropriate sub-categories, in line with the TCF outcomes noted below.

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| **Outcome 1**<br>Customers are confident that they are dealing with firms where the fair treatment of customers is central to the firm culture | **The governance structures take TCF into account**<br>*If members believe that the TSRF is not cognisant of their responsibilities to members and are breaching their fiduciary duties as Trustees. Complaints relating to the Board not taking TCF into account through all the processes and procedures and the day-to-day running of the Fund.* |
| | |
| **Outcome 2**<br>Products and services marketed and sold in the retail market are designed to meet the needs of identified customer groups and are targeted accordingly. | **The design of product or service**<br>*Complaints indicating that <u>specific features of the product or service</u> are unfair, inadequate, confusing or overly complex, or unsuitable for the members at which they have been targeted. Complaints regarding the features or operation of retirement and death benefits, bundled products or add-on / value added services, and risk benefits included.* |
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| **Outcome 3**<br>Customers are given clear information and are kept appropriately informed before, during and after the time of contracting | **Information provided to clients or potential clients**<br>*Complaints about any documentation provided to members or prospective members, or other communications with members or prospective members are inaccurate, unsuitable, misleading, incomplete, confusing, unclear, etc. It will cover both advertising and marketing material as well as specific product or service related communications. It will also cover information provided at all stages of the product life cycle, not only at or before point of entry. Complaints regarding such information could apply to either the content of the information, or the manner or medium in which it is provided. It will also include complaints regarding a failure to provide information, or that information was provided at an inappropriate time.* |

| | Sub-category | Complaint example |
|---|---|---|
| | Information – inaccurate (data capture error) | Wrong info on member/ employer document |
| | Information – unsuitable | Do not SMS or phone to market policies / language issues in ads |
| | Information – misleading | Information is misleading |
| | Information – incomplete<br>Information – incomplete – not aware of lapse of risk benefits<br>Information – incomplete – not aware of arrear contributions | Information not complete<br>Not aware of risk benefits lapsing |
| | Information – confusing | Information provided is confusing |
| | Information – unclear | |
| | Information – failure to provide member booklet on the Fund | Did not receive members booklet and/ or benefit statements. |

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| **Outcome 4**<br>Where customers receive advice, the advice is suitable | **Advice**<br>*TSRF Officials are not licensed to offer financial advice to members. If a TSRF requires advice the member must contact the Fund's call centre to be referred to a authorised representative and use the online benefit counsellor.* |

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| and takes account of their circumstances | | |
| | **Sub-category** | **Complaint example** |
| | Advice – conflict of interest | |
| | Advice – Advisor remuneration | |
| | Advice – lack knowledge, skills, experience, integrity | Rudeness. Incompetence by TSRF representative or official. |
| | Advice - Misrepresentation<br>Advice – Misrepresentation - benefits not explained correctly<br>Advice – Misrepresentation - misleading information | Benefits not explained correctly (non-SA citizen, etc)<br>Misleading information<br>Benefits not explained ie. retirement, death and risk benefits |
| | | |
| **Outcome 5 (a)**<br>Customers are provided with products that perform as firms have led them to expect, and the associated service is both of an acceptable standard and what they have been led to expect. | **Product performance**<br>*Complaints indicating a member's disappointment in becoming aware of limitations relating to the product or service that are not in line with their expectations. The category would include complaints indicating that the member was not kept adequately informed during the life of the product of matters ie. being a retirement fund member, of the benefit structure and fund credit. Benefit statements not being provided.* | |
| | **Sub-category** | **Complaint example** |
| | Product performance | |
| | | |
| **Outcome 5 (b)**<br>Customers are provided with products that perform as firms | **Client service**<br>*Complaints expressing dissatisfaction with the firm's administration of requests and transactions (including complaints regarding the firm's technological support) and complaints relating to the way in which the firm's staff have dealt with the member (for e.g. complaints of rudeness,* | |

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| have led them to expect, and the associated service is both of an acceptable standard and what they have been led to expect. | *incompetence or non-responsiveness). This would include complaints regarding the administrative processing of payments to or by the member (ie. contributions paid from employer). Complaints relating to breaches of privacy or confidentiality also fall under this category. It is important to note that complaints relating to the customer service standards of third party or outsourced service providers are included in this category and should be specifically identified. Complaints arising from alleged fraudulent activity by the firm or a third party, where the member is dissatisfied with the manner in which the firm has handled the matter or with the assistance provided by the firm in attempting to resolve the matter, would typically also fall under this category. It is recommended that fraud related complaints of this type be specifically identified. Service complaints relating to the complaints handling process itself or to the administration of retirement, death and risk claims, are included below.* | |
| | **Sub-category** | **Complaint example** |
| | Service – rudeness | Rude to client |
| | Service – incompetence | Did not perform service as staff was supposed to |
| | Service – non-responsiveness | Not responding to e-mails, messages, switchboard |
| | Service – breach of privacy or confidentiality | Information given to third party without member consent |
| | Service – client service standards of service providers | Bad service at a TSRF or branch office or service provider call-centre |
| | Service- S13A - contributions not paid by employer to Fund – not allocated | S13A process not followed to recover outstanding contributions |
| | | |
| **Outcome 6 (a)** Customers do not face unreasonable post-sale barriers to | **Complaints handling** *This includes complaints regarding the process of handling customer complaints, enquiries and transactions and how members are treated or dealt with (e.g. complaints of rudeness, incompetence or non-* | |

<table>
<tr><td>change product, switch provider, submit a claim or make a complaint.</td><td colspan="2">responsiveness). Complaints regarding the administration of the complaints process, such as delays, poor communication regarding processes and decisions, cumbersome or inaccessible processes, failure to inform complainants of their rights regarding escalation or OPFA, etc. <u>It does not include dissatisfaction regarding the outcome of a complaint</u>, which would be regarded as a continuation of the original complaint.</td></tr>
<tr><td rowspan="4"></td><td>Sub-category</td><td>Complaint example</td></tr>
<tr><td>Complaints handling – poor communication regarding complaint process and decision</td><td></td></tr>
<tr><td>Complaints handling – inaccessible complaints process</td><td></td></tr>
<tr><td>Complaints handling – failure to inform of rights regarding complaint escalation to OPFA</td><td></td></tr>
<tr><td colspan="3"></td></tr>
<tr><td>Outcome 6 (b)<br>Customers do not face unreasonable post-sale barriers to change product, switch provider, submit a claim or make a complaint.</td><td colspan="2">Insurance risk claims<br>This category should be used for the above types of complaints only. These complaints would include (i) complaints relating to the administration of the claim process (such as delays, poor communication regarding processes and decisions, cumbersome or inaccessible processes, etc.), (ii) complaints relating to actual non-payment of claims. In the case of non-payment of claims, reporting requirements in relation to this category are likely to require the relevant firms to further sub-categorise these complaints in respect of the reasons for non-payment, such as: Required claim documentation / evidence not submitted, Criteria for insured event not met, , Non-disclosure or misrepresentation, benefit not in force, Claimant is not the person entitled to the benefits, Other reasons.<br>This category should be used for complaints regarding insurance risk claims (ie. death and disability benefits) and the non-payment or repudiation of claims. These complaints would include complaints relating to the administration of the claim process (such as delays, poor communication regarding processes and decisions, cumbersome or</td></tr>
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| | *inaccessible processes, etc.); complaints relating to actual non-payment of claims.* | |
| | **Sub-category** | **Complaint example** |
| | Claim – payment delay – incomplete documents<br>Claim – payment delay – investigation<br>Claim – payment delay – poor communication<br>Claim – payment delay – poor administration | Claim delay |
| | Claim – poor service – rudeness by claims staff | Rudeness by claims staff |
| | Claim – non-payment – Documentation/evidence not submitted | Claim documents not provided |
| | Claim – non-payment – unpaid premiums | S13A – arrear contributions not collected |
| | Claim – non-payment – criteria for insured event not met | Criteria for insured event not met |
| | Claim – non-payment – beneficiary dispute / claimant not entitled to benefit | Beneficiary dispute |
| | Claim – non-payment – claim quantum dispute | Claim value |
| | Claim – non-payment – fraudulent claim | |
| | Claim – non-payment – other | |

## 7. ROLES & RESPONSIBILITIES

The following parties are involved in TSRF's complaints resolution process:

**Legal and Risk Officer / Legal and Risk Sub-Committee**

The Legal and Risk Officer is responsible to oversee the complaints process and to ensure that the TSRF's TCF obligations are achieved. Complaints Reports are presented to the

Legal and Risk Sub-Committee, who are responsible to consider the following presented by the Legal and Risk Officer to the committee:

- To consider complex complaints to propose solutions to resolve the complaint;
- To review statistics and to identify and monitor trends;
- To analyse complaint root causes common to categories of complaints and instances where such root causes are likely to affect other clients, products or processes and recommend improvements;
- To identify failings in control systems and recommend corrective action;
- To detect poor staff or service provider performance, lack of skills or misconduct;
- To track the success of the company's TCF delivery or risks thereof;
- To refer cases of transgression identified to the relevant forum for further investigation.

**Pension Fund Adjudicator and FSCA**

Complaints can be received directly from the Pension Funds Adjudicator or Financial Sector Conduct Authority. These complaints have separate requirements and timelines, dictated by the applicable adjudicator and regulator. In cases of external complaints, the appointed service provider communicates with the Pension Funds Adjudicator, and not directly with the complainant. Save and except of the Principal Officer and the Legal and Risk Officer, NO staff member or representative may deal with OPFA directly, unless specifically requested to by the Principal Officer or Legal and Risk Officer. TSRF maintains open and honest communication and co-operation with any adjudicator and regulator. It endeavours to resolve a complaint before a final determination or ruling is made by the Adjudicator.

**Board of Trustees**

The board of trustees is responsible for effective complaints management and approves and oversees the effectiveness of the implementation of the Complaints Management Framework. The process is approved through the Legal and Risk Sub-Committee. The board of trustees is ultimately responsible to ensure that the outcomes of TCF are achieved.

## 8. COMPLAINT PROCESS

### 8.1 Internal Complaints Resolution Procedure:

On first approach by a member directly, the Legal and Risk Officer attempts to resolve the enquiry. The PO's assistance is requested, if necessary.

No complaint is registered for client enquiries that are resolved in this manner.

If the enquiry or problem cannot be resolved and/or the client explicitly wants to lodge a complaint the following process is followed:

- The complainant is requested to submit the complaint in writing. The complainant should provide enough and all necessary information and sign the forms;
- A copy of the complaints resolution procedure document is provided to the complainant, if requested;
- The complaint documents are immediately sent to complaints Outlook mailbox (within at least 1 working day);
- Communication is sent to the member confirming receipt and referring them to the appointed complaints administrator;
- The service providers Complaints Process, attached as Annexure A, will then be followed.

### 8.2 External Complaints Management Procedure:

**Complaints department**

When an external complaint (when a complaint has been received via a regulatory authority) is received, the complaints department of the service provider will follow the complaint resolution procedure, as per the attached process annexed as Annexure A.

## 9. ROOT CAUSE ANALYSIS OF COMPLAINTS

The Legal and Risk Officer will assess the monthly complaints report received from the service provider. Quarterly management reports will be prepared by the service provider to report on the source, root causes and outcome of all complaints to be sent to the OPFA and the FSCA. The root cause analysis report will provide recommendations to the applicable business units to implement remedial actions to prevent similar complaints from occurring and to improve services and procedures where necessary in the business.

## 10. COMPLAINT PROCESS FLOW CHARTS

Annexure A attached.

## 11. COMPLAINTS ESCALATION AND REVIEW PROCESS

- Where the complaint is rejected or not finalised to the satisfaction of the complainant, the complaint may be escalated to the Legal and Risk Officer and the Legal and Risk Sub-Committee for review or to the relevant adjudicator within the regulatory timeframe;
- When a complaint is escalated via this process, a balanced and impartial approach is followed, focusing on the fair treatment of complaints.

## 12. TSRF COMPLAINTS REGISTER

The TSRF Complaints Register is an electronic task flow system. It is used for registering complaints, allocating complaint reference numbers, following up on unresolved complaints, recordkeeping and assigning complaint investigation tasks to the relevant role-players.

The complaint supporting documentation is received via the complaints mailboxes and records are kept on the system in electronic format. The complaint system is used to follow up on complaints to ensure it is resolved within 14 working days.

## 13. RECORD KEEPING

Complaint records are accurately, efficiently and securely stored on the service provider's admin system and on the TSRF Complaints Register. Any hard copy complaints received by our offices are scanned and attached to the member's record on the system. Copies of all relevant evidence, correspondence, progress and decisions are kept. Records are kept for a minimum period of 5 years.

The following guidelines are followed on the record keeping of reportable complaints:

- Record of all relevant details of the complainant and the subject matter of the complaint;
- Copies of all relevant evidence, correspondence and decisions are kept;

- Record of complaints categorisation is kept;
- Progress and status of complaints, including whether such progress is within or outside any set timeline are kept.

The following data is maintained in relation to reportable complaints:

- Number of complaints received;
- Number of complaints upheld;
- Number of rejected complaints and reasons for the rejection;
- Number of complaints escalated by complainants to the internal complaints escalation process;
- Number of complaints referred to OPFA and their outcome;
- Dates and timelines of the complaints process;
- Number of matters resolved;
- Total number of complaints outstanding.

## 14. MONITORING, OVERSIGHT, ROOT CAUSE ANALYSIS AND CORRECTIVE ACTION

The Legal and Risk Officer is responsible for managing and overseeing the complaints process. This is done by assessing the monthly complaints reports received from the service provider. Qualitative and quantitative analysis of member and adjudicator complaints are done. Particular complaints are used as case studies for training purposes. Positive and negative trends are identified during quantitative analysis to confirm success of initiatives or to mitigate emerging risks.

Complaints analysis is used to implement corrective action and to:

- Identify root causes common to categories of complaints and instances where such root causes are likely to affect other members, products or processes;
- Identify failings in control systems;
- Detect poor staff or service provider performance, lack of skills or misconduct;
- Track the success of the company's TCF delivery or risks thereto;
- Demonstrate the benefit of effective complaint management by using lessons from complaint analysis to effect meaningful improvements for members and the fund;
- Refer cases of transgression identified to the relevant forum for further investigation.

## 15. QUALITY ASSURANCE AND REPORTING

A quality assurance process is used to ensure that the complaints service being assessed meets the required standard. It is also used to drive improvements. Bi-monthly meetings are held to evaluate the quality of the complaint responses, handling, task management, complaint assessment, complaint resolution and member correspondence.

Regular and/or ad hoc reports are compiled on request, and include date, but not limited to, relating to the complaint per source, nature category, sales, policy type, status, compensation or goodwill payments and complaint resolution. The aim is to improve complaints handling and address the root cause of the complaints.

## 16. TRAINING AND AWARENESS

Training on the complaints process and awareness are provided to new staff appointed at TSRF. Refresher training to existing staff is done on an ongoing basis. Training is conducted by the service providers/s.

Determinations, Tribunal findings, publications and guidance issued are monitored to identify failings or risks in TSRF's own policies, services and practices. This is communicated internally to all relevant stakeholders.

TSRF staff and service providers are adequately trained and have the appropriate experience and knowledge in complaints handling, the fair treatment of clients, the subject matter of the complaints concerned and the relevant legal and regulatory matters. They are not subject to a conflict of interest and are adequately empowered to make impartial decisions and recommendations. Ongoing training is done through Team meetings.

## 17. REVIEW OF COMPLAINTS MANAGEMENT FRAMEWORK

TSRF's complaints management framework and supporting documents will be reviewed on an annual basis and any amendments thereto will be documented.

## 18. CONSEQUENCES OF NON-COMPLIANCE

Non-compliance to the process will be subject to disciplinary action as indicated within TSRF's disciplinary framework.

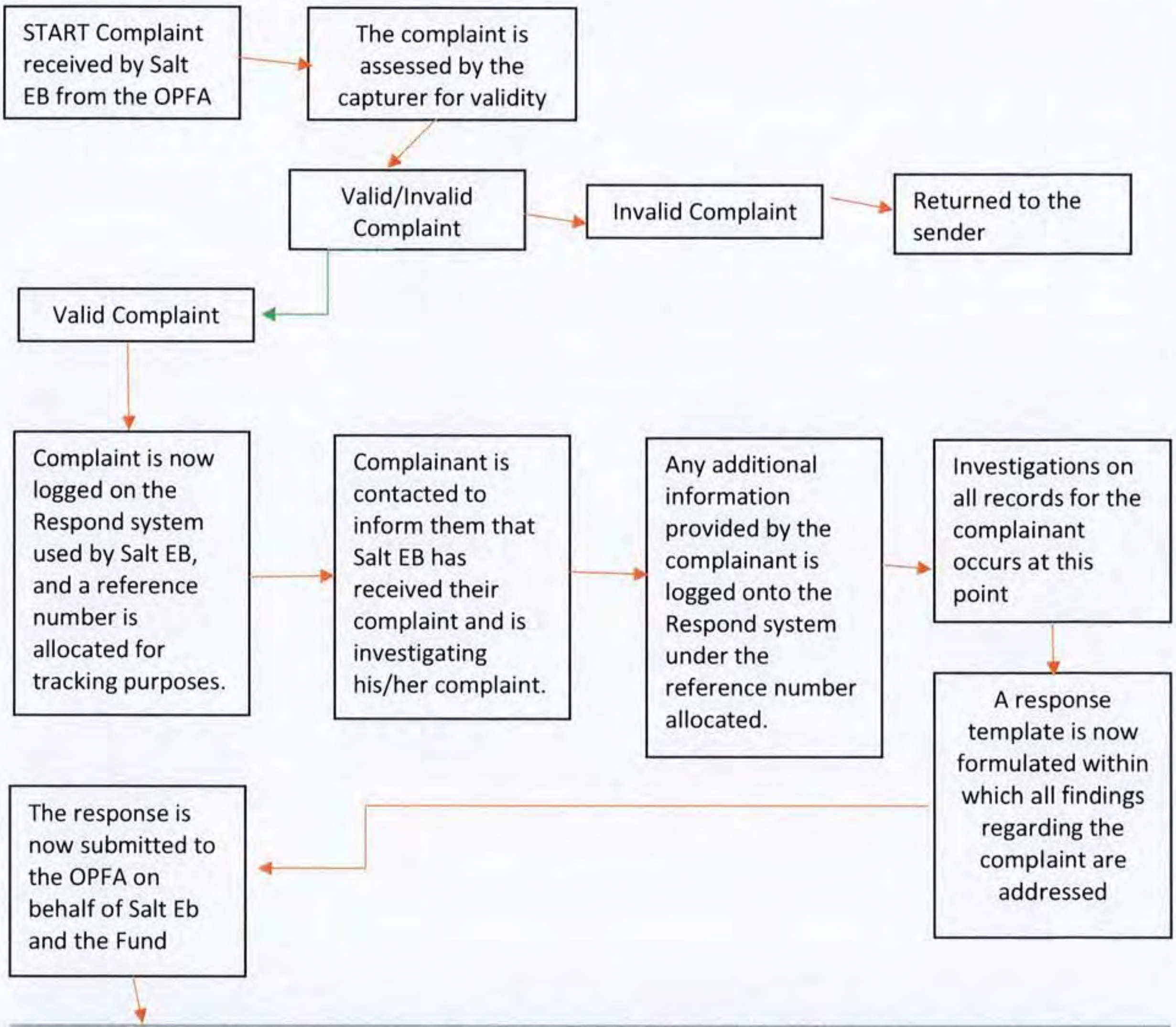
## 19. CONTACT PERSON

The TSRF Legal and Risk Officer: Penny Spentzouris
penny@tsrf.co.za
076 606 0982

Annexure "A"

## COMPLAINTS AND DETERMINATIONS WORKFLOW PROCESS

### COMPLAINTS PROCESS




**The Respond system is updated with the response sent to the OPFA and the date on which it was submitted. This ends the complaints receipt and response flow. The steps below are the start of the Determinations process**

## COMPLAINTS AND DETERMINATIONS WORKFLOW PROCESS

### DETERMINATIONS PROCESS

The Determination is received by Salt EB from the OPFA

The Determination is then linked to the complaint via the Respond system

A reconstruction is requested which is the calculation to put the member in a position had all his contributions had been received. This includes LPI on contributions. This calculation is advanced by 3 months to accommodate for any delays from the employer's side.

The Determination along with the reconstruction is then sent to the employer via email,

Should the employer comply and pay the reconstructed value over to the fund, this is then allocated to the members record, processed on the Everest system, and paid to the member.

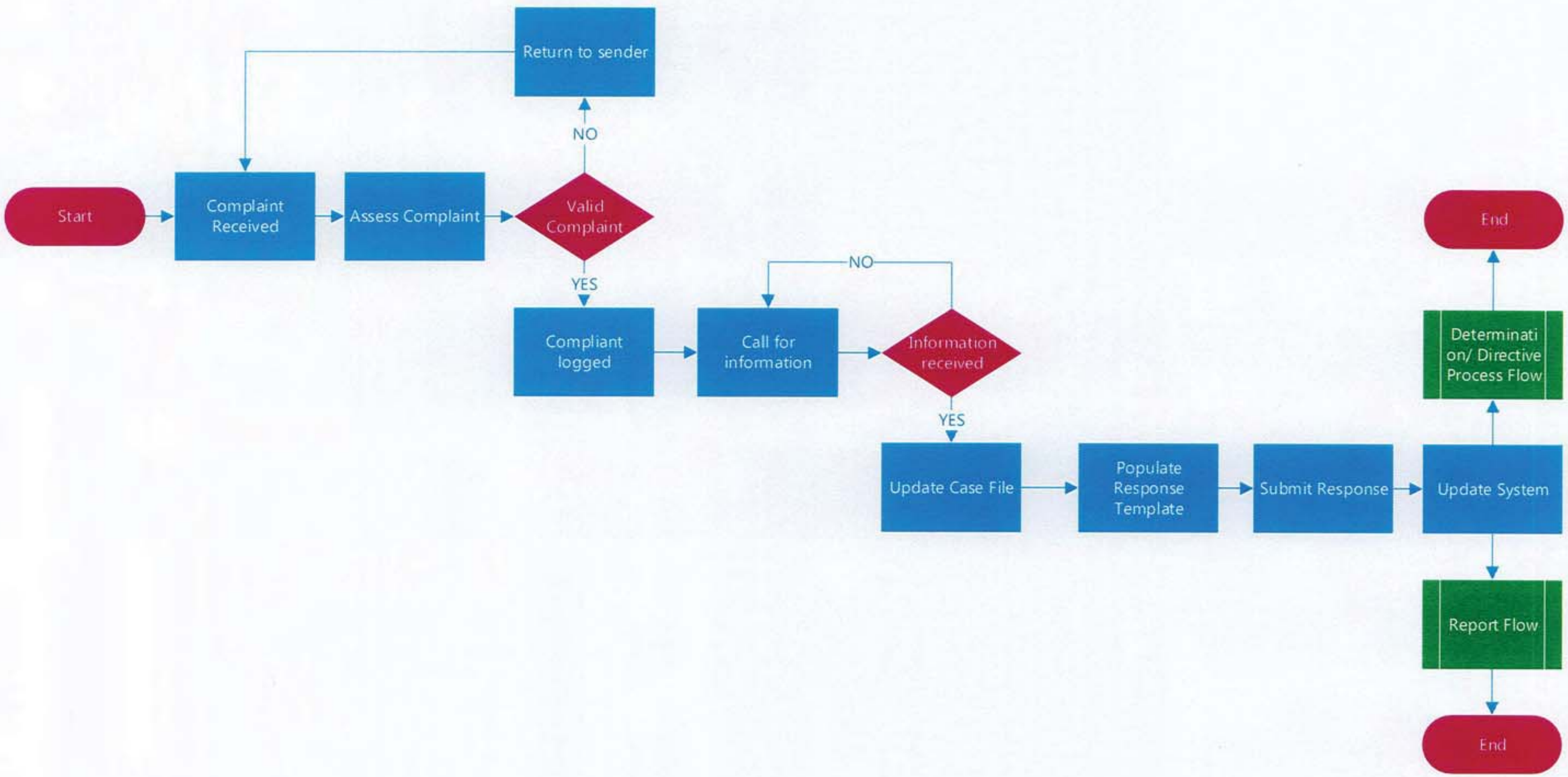
Should the employer not comply, a first follow up is done after 2 weeks of the Determination being implemented.

Should the employer still not comply, a second follow up is done after 4 weeks of the Determination being implemented.

Should no response be received from the employer, the bundle containing the original complaint, SEB response to the OPFA, the implementation of the determination, the first and second follow up communication and all other communication will be handed over to the fund for legal action.

Salt EB will attach the bundle documents onto the members record on Everest and flag the case on the Respond system as handed over to the fund.

1.1



Start
Complaint Received
Assess Complaint
Valid Complaint
NO
Return to sender
YES
Compliant logged
Call for information
Information received
NO
YES
Update Case File
Populate Response Template
Submit Response
Update System
Determinati on/ Directive Process Flow
End
Report Flow
End