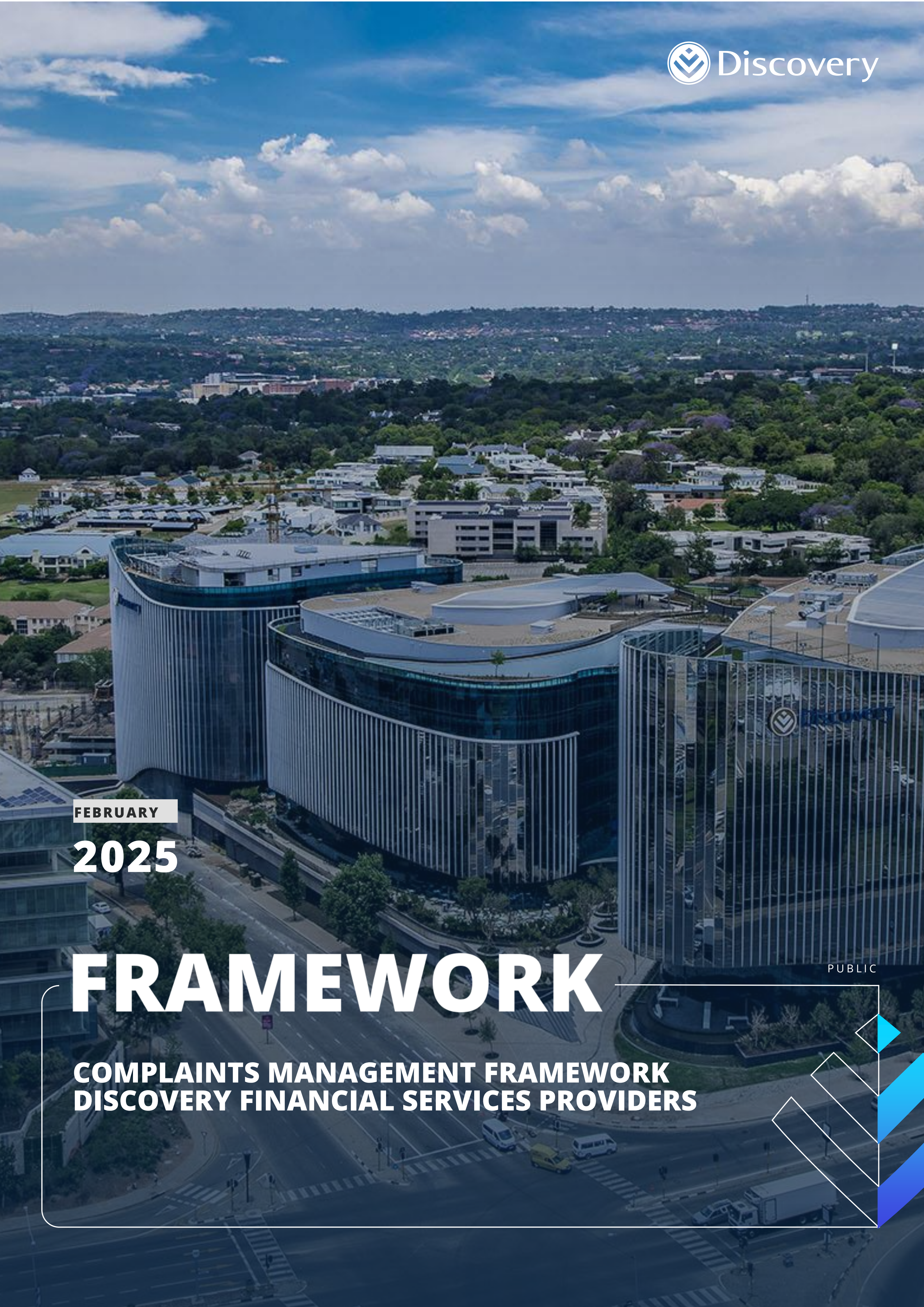

FEBRUARY

2025

FRAMEWORK

PUBLIC

COMPLAINTS MANAGEMENT FRAMEWORK DISCOVERY FINANCIAL SERVICES PROVIDERS

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1 | INTRODUCTION

The Financial Advisory and Intermediary Services (FAIS) Act, 2002, General Code of Conduct for authorised financial services providers and representatives, requires authorised Financial Services Providers (FSPs) to establish and maintain an effective Complaints Management Framework (CMF) to ensure the fair and timely resolution of complaints.

Discovery Limited and its South African subsidiaries (Discovery) are committed to ensuring that all FAIS complaints are handled effectively and fairly.

The FAIS Centre of Excellence (FAIS COE), a division within Group Compliance, is responsible for drafting and reviewing this Framework and ensuring its approval by the relevant governance committee(s).

This Framework outlines the principles and objectives for resolving FAIS complaints at Discovery FSPs. It aims to ensure transparency, accountability and effective compliant handling processes, including the identification and addressing market conduct risks. This will ultimately contribute to improved client experience and service delivery.

2 | APPLICATION

This Framework is applicable to all Discovery FSPs, i.e. –

1. Discovery Life Limited (FSP 18147)
2. Discovery Health (Pty) Ltd (FSP 18564)
3. Discovery Insure Limited (FSP 43064)
4. Discovery Bank Limited (FSP 48657)
5. Discovery Connect Distribution Services (Pty) Ltd (FSP 46336)
6. Discovery Life Investment Services (Pty) Ltd (FSP 30277)
7. Cogence (Pty) Ltd (FSP 52242)

and any third party and their employees who manages complaints on behalf of Discovery FSPs.

3 | IMPLEMENTATION

Each Discovery FSPs must obtain approval and adoption of this Framework from its board of directors or relevant governance structure (committee). The FSP, along with its board of directors are accountable for adhering to this Framework.

If an FSP has its own Board approved complaints policy, the policy must be aligned with this Framework and the policy must note that it must be read together with the Framework.

The FAIS COE will collaborate closely with relevant stakeholders to provide oversight and guidance for the successful implementation of this Framework. Furthermore, the FAIS COE will conduct training sessions on the Framework for all Discovery FSPs. Discovery FSP management is responsible for ensuring that their employees receive adequate training on the internal complaints processes.

4 | FAIS COMPLAINTS

The FAIS COE manages all FAIS complaints related to the Financial Services Conduct Authority (FSCA) and the Financial Services Tribunal (FST). The Legal Department within Discovery Life handles all FAIS Ombud complaints. Each Discovery FSP is responsible for managing their own day-to-day FAIS client complaints.

A. WHAT IS A FAIS COMPLAINT?

A FAIS complaint is a specific complaint related to the advice and intermediary services provided by an FSP or representative. It is an expression of dissatisfaction by a person alleging that an FSP or its representative:

- contravened or failed to comply with FAIS regulations, resulting in financial prejudice or damage to the complainant
- willfully or negligently rendered a financial service that caused prejudice or damage to the complainant
- treated the complainant unfairly.

B. CATEGORIES OF COMPLAINTS

The primary categories of FAIS complaints are:

- poor or inadequate advice
- incidents of fraud
- poor or lack of service from the FSP, representative and/or their office.

Each FAIS complaint must be categorised and documented based on its primary type.

All other complaints, such as those related to product design, accessibility, changes, switches, insurance claims, or other issues, should be directed to the respective product house's complaints department.

C. SOURCE OF COMPLAINTS

Complaints can be received from multiple sources:

- **Direct from the complainant:** Complaints received directly from a complainant.
- **FAIS Ombud:** Complaints referred to the FAIS Ombud by a complainant dissatisfied with the FSP's resolution.
- **FSCA:** Complaints referred to the FSCA by the complainant.

D. OUTCOMES RELATING TO COMPLAINTS

There are two possible outcomes when resolving a FAIS complaint:

1. Upheld complaints

An upheld complaint is a complaint resolved in favour of the complainant. The FSP is obligated to fulfil any commitments, such as compensation payments, or other actions promptly and within agreed timeframes.

An upheld complaint is considered as finalised when:

- the complainant explicitly accepts the resolution
- all FSP undertakings to resolve the complaint have been fulfilled

2. **Rejected complaints**

A rejected complaint is a complaint resolved in favour of Discovery. A rejected complaint is one that Discovery deems unjustified or invalid, or where the complainant does not accept or respond to Discovery's proposed resolution.

When a complaint is rejected, the complainant must be provided with clear and adequate reasons for the decision and must be informed of the escalation or review processes, including timelines.

Discovery regards the complaint as finalised after advising the complainant that it does not intend to take any further steps or actions to resolve the complaint.

5 | OUR APPROACH

Our approach to resolving FAIS complaints is guided by the principles outlined in this section. These principles ensure complaints are handled fairly, efficiently, and consistently, with prompt corrective actions, effective communication, and accurate recordkeeping.

A. THE COMPLAINTS PROCESS MUST BE CLEAR, FAIR AND COMPLIANT

Complaints must be addressed with impartiality, objectivity and fairness. Each FSP's complaints handling process must be documented in a standard operating procedure (SOP) and must:

- adhere to the complaints handling requirements outlined in this Framework
- adopt a balanced approach, considering the legitimate interests of all parties involved including the fair treatment of complainants
- provide for the internal escalation of complex or unusual complaints
- ensure complaints are considered after a thorough investigation of all relevant information and circumstances, with due regard to the fair treatment of complainants
- have clear decision-making and escalation procedures
- a documented complaints process must be accessible and available to clients on request
- ensure resources, including manpower and delegation of authority for the complaint handling process
- ensure that no fee is charged for a complainant to make use of complaint processes and procedures
- maintain accurate records of complaints
- monitor determinations, publications and guidance issued by any relevant authorities to identify any gaps or inadequacies in policies, services or practices
- include regular monitoring oversight and review processes
- ensure effective reporting of complaints as outlined in this Framework

Overview of the complaints process

Receipt of complaint → Acknowledge receipt of complaints → Record the complaint → Investigate the complaint → Draft a reponse

Receipt of compliant

All complaints should ideally be submitted in writing. Written complaints are crucial for several reasons.

- **Clear documentation**: Written complaints provide a clear a record of the issue, minimising misunderstandings.
- **Record keeping**: They serve as official records for tracking and reference.
- **Accountability**: Written complaints ensure accountability for the details provided.
- **Consistent handling**: They establish a standardised process for managing complaints.
- **Legal and compliance**: Written complaints are best industry practices and provides for audit trails of complaints.
- **Efficient resolution**: Written complaints enable a focused and effective resolution process.
- **Communication record**: They establish a baseline for communication and track actions taken.

Should a complaint be received verbally, the complainant should be advised to reduce their complaint to writing. If this is not possible, the telephonic call with the complainant should be recorded and the recording must be easily retrievable.

Acknowledgement of complaint by a complaints' handling employee

Complaints handling employees must promptly acknowledge the complaint in writing. The acknowledgement should include the following information:

- **Contact information:** Provide clear contact details for the complaints department, preferably a single point of contact for easy accessibility. As well as contact details for the relevant FAIS Ombud, FSCA or relevant regulator.
- **Complaints handling process:** Explain the steps involved in the complaints handling process.
- **Required information:** Specify the type of information needed from a complainant to facilitate a thorough investigation.
- **Submission process:** Clearly outline where, how and to whom the complaint and relevant information should be submitted
- **Expected turnaround times:** Provide an estimated timeframe for resolving the complaint.
- **Complainant responsibilities:** Communicate any responsibilities or actions required from the complainant, such as providing additional information or documentation.
- **Escalation process:** Inform the complainant of the option to escalate unresolved complaints to the relevant authorities, such as the FAIS Ombud, FSCA or other regulators.

If the complaint was received telephonically and the complainant is not able to submit the complaint in writing, the complaints handling employee must acknowledge the complaint verbally and provide sufficient information to the complainant as set out above.

Record the complaint

Recording complaints is a crucial step in effective complaint management. It involves documenting key details to ensure proper handling, resolution, and future reference. The complaints handling process must establish requirements for recording complaints to guarantee accuracy, efficiency and security.

Key aspects of complaint recording:

- **Accuracy**: Capture all relevant information, including complainant details, the nature of the complaint, and supporting documentation.
- **Consistency**: Use standardised templates or systems for consistent documentation across the FSP.
- **Timeliness**: Record and categorise complaints promptly to avoid missing critical details or deadlines.
- **Transparency**: Maintain clear and accessible records for investigations, audits and reporting.
- **Confidentiality**: Protect complainants' privacy by securely storing records in compliance with data protection laws.

  Tracking and Monitoring: Use recorded information to track the status of complaints and measure resolution effectiveness.

Complaints register

The FSP should maintain a complaints' register. The complaints register should include the following:

- complainant details
- source of the complaint (client, FSCA or FAIS Ombud)
- product information
- policy number(s)
- representative information
- relevant FSP, franchise, regional manager or team
- type of compliant
- complaint summary
- status of complaint (pending or finalised)
- service level agreement adherence
- due date and/or resolution date
- reason for resolution
- ex-gratia payment, compensation or goodwill gestures
- treatment of customers fairly (TCF)
- legislative impact
- additional comments

All relevant evidence, correspondence and decisions must be saved on the client folder on a central drive. The information should be readily available and accessible to the FAIS COE. Proper complaint recording facilitates efficient resolution and helps identify patterns or recurring issues that may require systemic improvements.

Investigate the complaint

Investigating complaints is a critical step in effectively addressing client complaints. A thorough investigation helps identify and resolve the root cause of the issue. A well-structured investigation process helps build trust, improve customer relationships, and enhance the organization's complaint-handling practices.

Key steps in the process include:

- **Gather information**: Collect relevant details from the complainant, including supporting documents or evidence, and review internal records. This may involve information about the product or service, the date and time of the incident, the representative involved. Request any additional information needed.
- **Identify key issues**: Clearly define the main concerns raised in the complaint.
- **Engage stakeholders**: Consult with relevant departments, employees, or third parties to gain a full understanding of the situation.
- **Conduct objective analysis**: Assess the facts impartially, ensuring no bias influences the investigation's outcome.
- **Determine the root cause**: Identify the underlying cause of the issue to prevent recurrence.

- **Document findings**: Record all investigation steps, findings, and conclusions to maintain transparency and accountability.

Response to complaints

- **Communicate the outcome**: Inform the complainant of the outcome of the investigation, including any resolution steps or actions taken.
- **Take corrective action**: Implement necessary measures to resolve the issue and address any systemic problems that may have contributed to the issue.
- **Monitor and follow-up**: Ensure that the necessary resolution steps have been taken and follow up with the complainant to confirm their satisfaction with the outcome of the complaint.

Complaints escalation

The complaints management process must have clear requirements for managing and escalating complaints. It should be streamlined to avoid unnecessary complexity and administrative burdens. The complaints escalation process should:

- **Delegate routine complaints:** Ensure that routine complaints are handled by designated individuals with the necessary authority.
- **Escalate complex complaints:** Provide a mechanism for escalating non-routine complaints to individuals with the appropriate skills and expertise.
- **Implement follow-up procedures:** Establish internal follow-up procedures to prevent recurring complaints and improve services.
- **Facilitate escalation by complainants:** Provide a mechanism for complainants to escalate unresolved complaints.
- **Appoint impartial reviewers:** Assign impartial, senior functionaries within Discovery or appointed by Discovery, to manage escalation or review processes.

B. EMPLOYEES MUST HANDLE COMPLAINTS TIMEOUSLY, OBJECTIVELY AND FAIRLY

Each FSP must ensure that all complaints handling employees are aware of the complaints handling process requirements, understand their roles and responsibilities and receive appropriate training to effectively manage complaints. To ensure the objectivity and impartiality, employees responsible for decisions or recommendations regarding complaints must:

- be adequately trained
- possess relevant experience, knowledge and skills in financial products, financial services, legal and regulatory requirements, complaints handling, and fair treatment of customers
- free from conflict of interest
- be empowered to make impartial decisions and recommendations

Responsibilities of complaints handling employees

The responsibility of the complaint handling employees may include, but are not limited to:

- receiving and acknowledging complaints
- recording complaints on the designated complaints register and/or system
- investigating and resolving complaints
- communicating and monitoring of the complaint resolution progress
- implementing necessary remedial action
- escalating complaints as required

Performance standards

Clear performance standards must be established and documented for complaints handling employees. These standards should be measured regularly to ensure independence from operational activities and objective and unbiased decision-making. Performance standards should not only focus on process adherence but also on the fairness and equity of outcomes.

Remuneration and reward

Remuneration and reward strategies for complaints handling employees should promote fairness and objectivity. Remuneration strategies must be formalised and documented, with clear criteria for determining remuneration and reward. To ensure impartiality, remuneration and reward strategies should:

- promote the fair treatment of clients
- recognise and reward compliance with regulatory requirements; and
- assesses the quality of complaints handling and not just the volume of complaints or outcomes.

These principles of remuneration and reward strategies should also apply to outsourced complaint handling functions.

C. COMMUNICATION MUST BE EFFECTIVE

Effective communication is essential to ensure that the complaints handling employees, stakeholders and complainants understand the complaints handling process, decision-making and service level agreement(s). Discovery is committed to keeping complainants informed by providing timely feedback decisions and alternative options or redress.

The communication strategy should:

- **Provide updates:** Keep complainants informed about the progress of their complaint and reasons for any delay in the finalisation of a complaint and revised timelines.
- **Use plain language:** Communicate in clear and simple language.
- **Utilise appropriate channels:** Choose suitable communication channels to reach the complainant.
- **Acknowledge complaints promptly:** Acknowledge all complaints within a reasonable timeframe, however not later than three (3) business days.

D. COMPLAINTS MUST BE MONITORED AND ANALYSED TO INFORM DECISION MAKING

Each FSP's complaints handling process must include data analysis to inform decision making and improved outcomes. All complaints data must be regularly reviewed to identify trends and root causes, manage conduct risks and prevent future issues.

The complaints handling employee needs to provide FAIS COE with a data analysis that must include trend and root cause analysis of all complaints received by Discovery. This analysis will help:

- mitigate the risk of poor service delivery
- prevent recurring complaints
- improve systems, controls, services and operational processes
- enable accurate reporting to all stakeholders including internal governance structures, the FAIS ombud, FSCA and/or any other regulators; and
- strengthen Discovery's commitment to customer satisfaction.

E. THE REPORTING ON COMPLAINTS MUST BE REGULAR, EFFECTIVE AND INFORMATIVE

The complaints handling process must provide for regular and ad hoc reporting of complaints from each FSP to the FAIS COE, management, assurance functions, executive management, the Board of Directors (Board) and any relevant committee of the Board.

Complaints Report

The complaints report should include the following:

- number of complaints received
- number of complaints upheld and rejected and reasons
- number of complaints escalated by complainants
- number of complaints referred to the FAIS ombud, FSCA and/or any other regulator and the outcome
- number of ex gratia/goodwill or compensation payments and rand value made and reasons.
- number of pending complaints and reasons
- average turnaround time for resolution of complaints
- number of complaints resolved outside of SLA
- types of complaints (advice, service or product)
- categorisation of complaints
- Identified trends

6 | ENGAGEMENT WITH FAIS OMBUD, FSCA AND/OR ANY OTHER REGULATOR

All FAIS Ombud complaints are received by the FAIS Ombud team through a designated email address (faisombud@discovery.co.za), who are responsible for obtaining the relevant information and documentation and providing a response to the FAIS Ombud.

All FSCA FAIS complaints are received by the FAIS COE through a designated email address (Complianceofficer@discovery.co.za). Upon receipt, the FAIS COE will refer the complaint to the respective complaint handling team of the FSP to provide information and documents to ensure that the FAIS COE can provide a response to the FSCA.

All other regulatory complaints will be dealt with by the respective departments i.e. Information Regulator, Financial Intelligence Centre.

7 | RESPONSIBILITIES OF THE FAIS COE AND FSP

A. RESPONSIBILITIES OF THE FAIS COE

The FAIS COE is responsible for:

- **Notifying Discovery FSP**: Informing Discovery FSPs of any FAIS complaints received.
- **Managing FSCA Complaints:** Acknowledging receipt of FSCA complaints and providing responses/resolutions. Requesting further information from Discovery FSP for adequate complaint assessment and handling. Providing

status updates on complaints to the relevant Discovery FSP and setting up regular meetings to discuss complaints, where necessary.

- **Complaint's process oversight:** Ensuring Discovery FSPs follow the complaints process, outlined in the SA Complaints Policy and this Framework.
- **FAIS mailbox management:** Overseeing all correspondence sent and received from the FAIS complaints mailbox.
- **Complaints register oversight:** Overseeing and reporting on complaint registers submitted by Discovery FSP.
- **Reporting:** Updating monthly/quarterly reports with all complaints handled in the reporting period.
- **Record-keeping:** maintaining proper records of handled complaints including updating folders containing relevant information and documentation and updating registers.

B. RESPONSIBILITIES OF DISCOVERY FSP

Each Discovery FSP is responsible for:

- **FAIS complaint notification:** Notifying the FAIS COE Complaints team via the dedicated mailbox (faiscomplaints@discovery.co.za) of any FAIS related complaints.
- **Information provision:** Providing the FAIS COE with all the information for timely complaint handling.
- **Remedial action:** Taking remedial action where required, such as promptly reporting dishonesty/fraudulent behavior to Group Forensics.
- **Escalations:** Escalating matter to relevant stakeholders, committees and boards where necessary.
- **Information sharing:** Providing all relevant evidence and information to the FAIS COE team regarding FSCA complaints for proper response drafting.
- **Record retention:** Retaining all records in accordance with the Data Governance and Data Management Policy.
- **Complaints' register:** Maintaining a register of complaints and their outcomes.
- **Complaint analysis and reporting:** Identifying, analysing and reporting on complaints.
- **FAIS COE guidance:** Seeking guidance from the FAIS COE team where necessary.
- **Meetings:** Attending regular meetings with the FAIS COE team to discuss complaints.
  Complaints register and report submission: Sending their complaints' register and report to the FAIS COE by the 1st of each month.

8 | COMPLIANCE WITH THIS FRAMEWORK

This Framework aligns with Discovery's values and reflect our commitment to high standards. Breaches of this Framework are considered serious and may result in consequences ranging from warnings to termination of employment.

Any breach of, or non-compliance with, this Framework must be reported to the Framework owner as soon as reasonably practical. The Framework owner, in consultation with key stakeholders, will determine appropriate action(s) to be implemented as corrective actions. All instances of non-compliance will be included in regular risk and compliance reports and reported to the relevant board or committee.

9 | DEFINITIONS

TERM	DEFINITION
Authority	A person and/or organisation having legislative, regulatory and / or administrative power and control within a defined jurisdiction.
Client	A policy holder, member, or financial customer, which can be a natural or legal person who received advice and/or intermediary services regarding a financial product and/or service from an FSP.
Client query	A request to the FSP (Discovery) or the FSP's service supplier by or on behalf of a client, for information regarding the FSP's financial products, financial services or related processes, or a transaction or action in relation to any such product or service.
Compensation payment	A payment, whether in monetary form or in the form of a benefit or service, by or on behalf of a FSP to a complainant to compensate the complainant for a proven or estimated financial loss incurred as a result of the FSP's contravention, noncompliance, action, failure to act, or unfair treatment forming the basis of the complaint, where the FSP accepts liability for having caused the loss concerned, but excludes any – a) goodwill payment b) payment contractually due to the complainant in terms of the financial product or financial service concerned, or c) refund of an amount paid by or on behalf of the complainant to the FSP where such payment was not contractually due d) and includes any interest on late payment of any amount referred to in (b) or (c)
Complaint	An expression of dissatisfaction by a person - ▪ to Discovery or, ▪ to the knowledge of Discovery, to Discovery's service supplier relating to a financial product or financial service provided or offered by Discovery which indicates or alleges, (regardless of whether such an expression of dissatisfaction is submitted together with or in relation to a client query), that: o Discovery or its service supplier has contravened or failed to comply with an agreement, a law, a rule, or a code of conduct which is binding Discovery or to which it subscribes. o Discovery or its service supplier's maladministration or willful or negligent action or failure to act, has caused the person harm, prejudice, distress or substantial inconvenience; or o Discovery or its service suppliers has treated the person unfairly.
Complainant	Provides for a broader definition of who is considered as a complainant and includes a: ▪ client ▪ person nominated as the person in respect of whom a product supplier should meet financial product benefits or that persons' successor in title (i.e. policy owner or beneficiary)

	▪ person whose life is insured under a financial product that is an insurance policy (i.e. life insured) ▪ person that pays a premium or an investment amount in respect of a financial product (i.e. premium payer) ▪ member ▪ person whose dissatisfaction relates to the approach, solicitation marketing or advertising material or an advertisement in respect of a financial product, financial service, or related service of the FSP (i.e. general public or client) ▪ person who has a direct interest in the agreement, financial product, or financial service to which the complaint relates, or a person acting on behalf of a person referred to above (i.e. client or person nominated by the client)
Compensation payment	A payment, whether in monetary form or in the form of a benefit or service, by or on behalf of a FSP to a complainant to compensate the complainant for a proven or estimated financial loss incurred as a result of the FSP's contravention, non-compliance, action, failure to act, or unfair treatment forming the basis of the complaint, where the FSP accepts liability for having caused the loss concerned, but excludes any: ▪ goodwill payment ▪ payment contractually due to the complainant in terms of the financial product or financial service concerned (and includes any interest on late payment) ▪ refund of an amount paid by or on behalf of the complainant to the FSP where such payment was not contractually due
Escalated complaint	Is an extension of a complaint relating to the outcome of the initial complaint, or the complaint is so complex or unusual that it requires intervention by an impartial senior functionary appointed to deal with escalated complaints, or the resolution of the initial complaint is not to the complainant's satisfaction and is then referred to the appropriate Regulator or Ombudsman scheme by the complainant.
FAIS complaint	A specific complaint relating to a financial service rendered by a FSP or a representative of such FSP to the complainant, where the FSP or representative: ▪ has contravened or failed to comply with FAIS and as a result thereof the complainant has suffered or is likely to suffer financial prejudice or damage ▪ has willfully or negligently rendered a financial service to the complainant which has caused prejudice or damage to the complainant, or ▪ has treated the complainant unfairly
Financial product	Is any: ▪ securities and instruments ▪ a participatory interest in one or more collective investment schemes ▪ a long-term or a short-term insurance contract or policy ▪ a benefit provided by a pension fund ▪ a foreign currency denominated investment instrument, including a foreign currency deposit ▪ a bank deposit ▪ a health service benefit ▪ a provision of credit, warranty, guarantee or credit support

	▪ short- and long-term deposits, and ▪ any loyalty or wellness programmes linked to a financial product
Financial service	Financial service is any professional services involving the advice, intermediation, investment, lending, and management of money and assets in relation to a financial product including: ▪ offering, promoting, marketing, or distributing ▪ providing advice, recommendations, or guidance ▪ providing intermediary services ▪ operating or managing ▪ providing administration services ▪ provision of credit and debt collection services ▪ a service provided to a FSP through an outsourcing arrangement
Goodwill payment	A payment, whether in monetary form or in the form of a benefit or service, by or on behalf of a FSP to a complainant as an expression of goodwill aimed at resolving a complaint, where the FSP does not accept liability for any financial loss to the complainant as a result of the matter complained about.
Internal complaints resolution system and procedure	The system and procedures established and maintained by Discovery for the resolution of complaints.
Ombud	An official and/or organisation appointed to investigate clients' complaints against Discovery.
Regulator	A person and/or organisation having legislative, regulatory and/or administrative power, and control within a defined jurisdiction.
Rejected complaint	A rejected complaint means that the complaint has not been upheld and the FSP regards the complaint as finalised after advising the complainant that it does not intend to take any further action to resolve the complaint. It includes complaints regarded by the FSP as unjustified or invalid, or where the complainant does not accept or respond to the FSP's proposals to resolve the complaint.
Representative	A representative of a Discovery FSP, where the Discovery FSP and the product supplier are the same legal entity. It includes a person that is employed or mandated by a Discovery FSP to render financial services to that FSP's Discovery Group clients.
Resolution	The process of resolving a complaint through and in accordance with the internal complaints resolution system and procedure of Discovery.
Reportable complaint	A reportable complaint means any complaint other than a complaint that has been: ▪ upheld immediately by the person who initially received the complaint ▪ upheld within the FSP's ordinary processes for handling client queries in relation to the type of financial product or financial service complained about, provided that such

	process does not take more than five business days from the date the complaint is received, or ▪ submitted to or brought to the attention of the FSP in such a manner that the FSP does not have a reasonable opportunity to record such details of the complaint as may be prescribed in relation to reportable complaints. For the purposes of this Framework, a reportable complaint are all FAIS related complaints received by the FSPs.
Upheld complaint	An upheld complaint that has been finalised wholly or partially in favour of the complainant and - ▪ the complainant has explicitly accepted that the matter is fully resolved ▪ it is reasonable for the FSP to assume that the complainant has so accepted; and ▪ all undertakings made by the FSP 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 the FSP within a time acceptable to the complainant.
Third party	A product supplier, another FSP, an associate of a product supplier or a FSP, a distribution channel or any person who provide a financial interest to a FSP or its representatives by entering into an agreement with one of the listed third parties.

FRAMEWORK CONTROL

DETAILS

Framework Owner | FAIS CENTRE OF EXCELLENCE - GROUP COMPLIANCE

Framework Level | SA COMPOSITE

Level of Approval | [COMMITTEE] OR [BOARD]

Frequency of Review | EVERY TWO YEARS OR AS AND WHEN LEGISLATIVE CHANGES OCCUR

REVISION HISTORY

REVISION DATE	VERSION	SUMMARY OF CHANGES	AUTHOR
December 2024	V1	New Framework	FAIS Centre of Excellence - Group Compliance

FRAMEWORK GOVERNANCE APPROVAL PROCESS

Each Discovery FSPs must obtain approval and adoption of this Framework from its board of directors or relevant governance structure (committee).

FRAMEWORK REFERENCES

This Framework should be read in conjunction with the following documents:

NUMBER	DOCUMENT NAME	DOCUMENT OWNER
1.	Complaints Policy SA INC. Strategic Strand	Group Compliance
2.	Data Governance and Data Management Policy	Group Information Governance and Security

www.discovery.co.za

Discovery Ltd is the licensed controlling company of the designated Discovery Insurance Group. Registration number: 1999/007789/06.
Companies in the Group are licensed insurers and authorised financial services providers.