



## TREATING THE CUSTOMER FAIRLY POLICY STATEMENT

TCF was clearly raised as one of the compliance objectives for 2013 during an annual strategy meeting and formally adopted by the Board.

In order to implement Constantia's policies on TCF, training has been conducted with each staff member responsible for complaints handling. Each employee is expected to understand and apply this policy as set out in the training material and as further detailed in the corporate code of conduct forming an integral part of their employment contracts with Constantia.

The following broadly encompasses the TCF policy adopted by Constantia and its employee members:

- Adhere to the employer's corporate culture of ensuring that clients fully understand the features, benefits, exclusions, risks and costs associated with the financial products they buy
- Ensure that clients are provided with clear, concise information and kept appropriately informed before, during and after the purchase of their products allowing them to make informed decisions
- Ensure that regular, clear and appropriate correspondence is maintained with client at all times and that the relevant communication protocols are strictly followed
- Adhere to the employer's phone etiquette standards and to provide excellent service to the client where the fair treatment of the client is central to that service
- Follow the principle that client service at all stages must meet client expectations and that any promises or commitments made must be met
- NOT give any financial advice to clients but to direct them to management where such advice is required or sought
- Ensure that any request from a client is attended to without any unnecessary barriers or delays
- Fairly manage the client's expectation at all times
- Leave the client feeling pleased about their experience with the Company and confident that they are dealing with an honest, professional and ethical organisation where the fair treatment of clients is central to the company's culture

**DuePoint, a division of Constantia Insurance Company Limited.**

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## TCF applied to Constantia's Complaints Functions:

- All valid claims are paid promptly
- The principles of "fairness and equity" are applied in all decisions, always giving the customer the benefit of the doubt where information is not perfectly clear
- A strict communication protocol is followed and processes are in place to monitor adherence thereto
- The complaints resolution function aims to resolve internal complaints within a 48 hour period and to the satisfaction of our clients.

