



**UNUM  
PRIME**

**UNUM PRIME (PTY) LTD  
COMPLAINTS AND DISPUTE RESOLUTION  
POLICY**

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## PLAN ADOPTION

By signing this document, I authorise the organisation's approval and adoption of the processes and procedures outlined herein.

### DOCUMENT VERSION CONTROL

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## 1. INTRODUCTION

- 1.1. The purpose of this framework is to outline UNUM Prime Proprietary Limited (“**UNUM Prime**”) client friendly complaints and dispute resolution procedure as an Over-the-Counter Derivative Provider (“ODP”). This document can be found on our website at [www.UNUM Prime.co.za](http://www.UNUMPrime.co.za) / at our office at Unit 1, 57 via Latina Crescent, Irene Corporate Corner, Irene, Pretoria, 0178.
- 1.2. The Framework serves to meet the requirements of relevant legislation and it needs to ensure the fair treatment of clients and must be reviewed regularly.

## 2. ALLOCATION OF RESPONSIBILITIES

- 2.1. The Chief Risk Officer is responsible within UNUM Prime to ensure that all complaints lodged are treated in line with this framework. The Chief Risk Officer ensures that adequate resources are allocated to complaints handling and that any person dealing with complaints is:
  - 2.1.1. Adequately trained;
  - 2.1.2. Experienced in complaints handling and appropriately qualified;
  - 2.1.3. Not be subject to a conflict of interest and
  - 2.1.4. Be adequately empowered to make impartial decisions or recommendations.
- 2.2. To effectively discharge items 2.1.1. to 2.1.4 above, the Chief Risk Officer has appointed and empowered a Complaints Officer who, on behalf of UNUM Prime, will handle all day-to-day requirements of dealing with Client complaints.

## 3. SUBMITTING A COMPLAINT

- 3.1. All complaints should be referred to the Complaints Officer with the following details:
  - 3.1.1. **Email:** [Compliants@unumprime.co.za](mailto:Compliants@unumprime.co.za)
  - 3.1.2. **Tel:** 012 141 3606
- 3.2. If possible, complaints should be submitted as follows:
  - 3.2.1. in writing, where possible, by completing the online form on the webpage [www.unumprime.co.za](http://www.unumprime.co.za), or alternatively complete the complaints form (Annexure A) available in our website and email it to [complaints@unumprime.co.za](mailto:complaints@unumprime.co.za) and attach all supporting documents relevant to the complaint to enable UNUM Prime to attend to the complainant’s concerns timeously.
  - 3.2.2. If not possible, by calling **012 141 3606**

- 3.3. Once a complaint is received, an acknowledgement of receipt is sent to the complainant including a Compliant reference number;
- 3.4. Management Framework detailing the process to be followed (within a reasonable time after receipt), including:
  - 3.4.1. contact details of the person/department that will be handling the complaint; and timelines.
  - 3.4.2. details of the internal complaint's escalation and review process and details of relevant Ombud where applicable.

## **4. COMPLAINTS PROCEDURE**

Upon receipt of a complaint, the Complaints officer shall categorise the complaint; and adhere to the below procedure when handling complaints received from clients.

### **4.1. Client Queries**

Clients may raise queries, by sending an email to [clientsupport@unumprime.co.za](mailto:clientsupport@unumprime.co.za). Queries are limited to requests by clients for information regarding UNUM Prime's financial products, financial services, or related processes, or to carry out a transaction or action in relation to any such product or service. In the event the query is not resolved within 24 hours, Clients may send complaints to the Complaints Officer at the address provided in clause 1.1 above.

### **4.2. Transactional Disputes**

4.2.1. Clients may raise transactional disputes such as discrepancies in pricing, client deposits or any activity conducted by the client while transacting in the trading platform.

4.2.2. Transactional disputes may be raised by sending an email to [clientsupport@unumprime.co.za](mailto:clientsupport@unumprime.co.za).

4.2.3. In the event of a transactional dispute, the complaint officer shall request that the finance department and head of operations resolve the discrepancy or provide justification.

4.2.4. The transactional dispute shall be resolved within 2 business days.

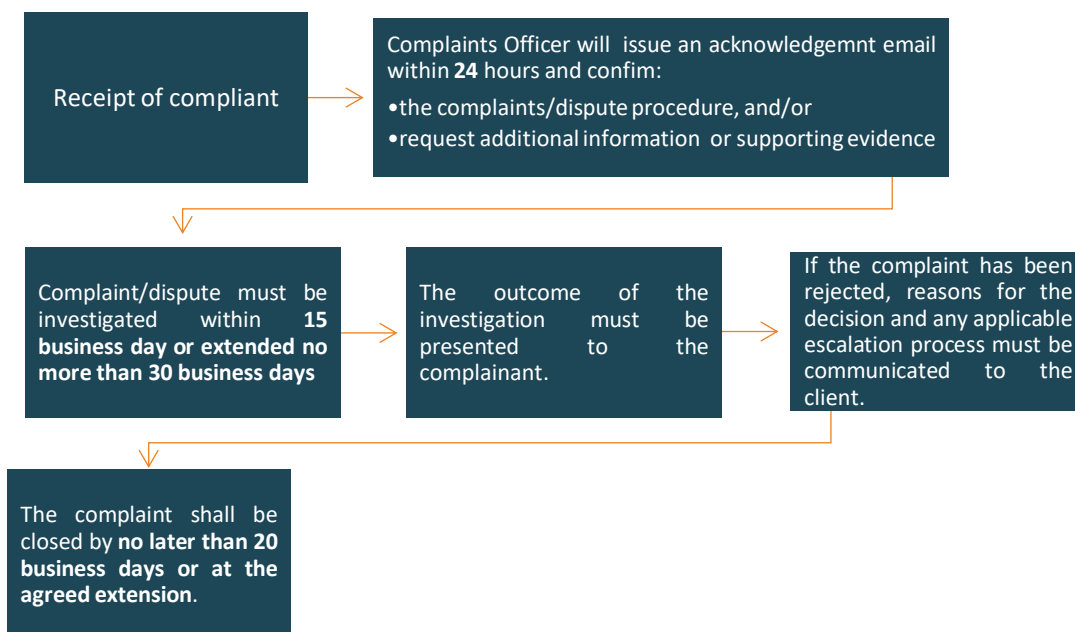
4.2.5. Should, after an investigation into a dispute raised by the Client as detailed in this policy, UNUM Prime finds that the Client's dispute is unfounded, the Client will be able to seek further resolution in Arbitration as per section 5.

### 4.3. Client Complaints

- 4.3.1. Clients who are dissatisfied with the service provided by UNUM Prime or any of its representatives/employees as an Over-the-counter Derivative Provider must submit a complaint in the manner mentioned in clause 4.2.2. below.
- 4.3.2. The complaint handler will acknowledge the client's complaint within 24 hours of the client submitting it, together with submitting a copy of the client's complaints and Dispute Resolution Process to the client;
- 4.3.3. The Complainant must provide UNUM Prime with the following information:
- a) Your name, surname and contact details;
  - b) A complete description of your complaint;
  - c) The date on which the matter complained about happened;
  - d) All documentation relating to your complaint;
- 4.3.4. The complaint handler may request any relevant information if not provided by the client at the submission of the complaint.

### 4.4. Procedure for handling valid complaints

In the event the Complaints Officer handling the complaint has resolved that the complaint is valid, the Complaints Officer will follow the below procedure:



- 4.4 Should the Complaint resolution procedure fail to satisfy either the Client and / or UNUM Prime, either party can declare a dispute and initiate the formal Arbitration process.

## **5 ARBITRATION**

- 5.1 A written communication shall be submitted to arbitration in accordance with the commercial rules of the Arbitration Foundation of Southern Africa (“AFSA”), however this is subject to agreement within the parties by the signing of an Arbitration Agreement. The Arbitration will then follow the process according to the AFSA Commercial Rules.
- 5.2 The outcome of the AFSA ruling will be binding on both parties.

## **6. DISCIPLINARY ACTION**

- 6.1 UNUM Prime expects all employees to conduct themselves appropriately in their day-to-day work, including in their dealings with colleagues, clients and other stakeholders. We view discipline in a progressive light, and it is only in instances of repeated misconduct that progressively more severe action will be instituted, particularly where a clear pattern is indicated by the employee’s misconduct.
- 6.2 Where the conduct of an employee falls short of the company standards, management will attempt to resolve the matter informally, where appropriate, to afford the employee with an opportunity to improve. Should the informal process not provide a resolution, then a formal disciplinary procedure set out below, will be adhered to.
- 6.3 The process that is generally followed in applying disciplinary action can be summarised as follows:

### **6.3.1 Contravention / alleged contravention**

Receipt of a complaint, or an observation or report of an act of misconduct may trigger corrective and/or disciplinary action.

### **6.3.2 Investigation**

The employee's supervisor investigates the complaint and considers whether corrective measures and/or any disciplinary action are appropriate.

This initial process usually takes the form of an informal investigation by the relevant manager to determine whether or not the incident warrants disciplinary action. This investigation should wherever possible also entail giving the employee(s) involved an opportunity to give their version/explanation of their behaviour.

### **6.3.3 Disciplinary action**

Types of disciplinary actions available to Independent Investment Solutions include:

- a) Verbal warning;
- b) Written warning;
- c) Final written warning;
- d) Demotion, as an alternative to dismissal only; and
- e) Dismissal

- 6.4 We deem cases of misunderstanding not to be serious. An example would be where a staff member, through their misunderstanding, has incorrectly handled a query from the client. In such instances, verbal warnings would suffice.

- 6.5 However, negligence by employees is viewed in a very serious light. An example would be where the employee has failed in their duty and shown negligence towards the client's query, complaint or dispute (i.e., breach of the standard operating procedures). In such cases, a written warning would be appropriate.
- 6.6 After the investigation, if the infringement is considered to be of a nature that does not require severe action, the manager should counsel the employee, and/or issue an appropriate warning to the employee, if a warning is considered appropriate (verbal-, written- or final warning).
- 6.7 Conducting a hearing procedure is therefore not a pre-requisite for the issuing of a warning to an employee. Moreover, a final written warning is generally only imposed by a senior manager if the offence concerned, was serious but did not warrant dismissal, or if an offence occurs which is similar to a previous infringement for which a written warning was already issued and has not expired.
- 6.8 When a serious offence possibly warranting dismissal is suspected, alleged or committed, or an offence for which a final warning is valid reoccurs, management is generally required to conduct a formal disciplinary Enquiry. The conducting of a formal disciplinary enquiry is an integral part of the disciplinary process if a dismissal is being contemplated. The human resource head would lead the process.
- 6.9 To ensure procedural fairness, every step followed in the formal disciplinary enquiry will be documented. After completion of the procedure, written motivation will be furnished to the employee and any recognised representative within 5 business days of the conclusion of the enquiry process.