

Complaints Policy

The executive of the business has set in place a policy and this document set out the procedures that need to be followed to ensure compliance with the policy. Relevant staff members are required to confirm that they understand their assigned duties and responsibilities. All complaints will always be handled in accordance with all legislation, regulations and codes of conduct that apply to all Infinite Credit Underwriting Managers (Pty) Ltd business activities. The Policies and Procedures for complaints must always comply with the Policy Holders Protection Rules and ensure that all the outcomes relating Advertising and Treating Customers Fairly are achieved in terms of:

- There must be documented procedures and policies in place
- A complaints management framework
- The allocation of responsibilities to handle complaints
- The categorization of complaints
- A complaints escalation and review process
- Continuous monitoring, review and analysis
- Continuous communication with the complaint

The Business has taken note of primary change introduced by the GCOC amendments of 2020, is the definition of a Complaint, which has now been aligned to the definition in the PPR, and ultimately embedded TCF requirements into the Complaints Management process and to align the requirements in terms of the GCOC with Insurers' Policyholder Protection Rules obligations, thus clarifying the fact that the same Complaints Management requirements now apply to all Insurers and Financial Service Providers and are applicable to ALL clients and must be set out as follows:

- *An Insurer/Provider, excluding a representative, must establish, maintain, and operate an adequate and effective complaints management framework to ensure the effective resolution of complaints and the fair treatment of complainants that -*
- *(i) is proportionate to the nature, scale, and complexity of the provider's business and risks.*
- *(ii) Is appropriate for the business model, policies, services, and clients of the provider.*
- *(iii) enables complaints to be considered after taking reasonable steps to gather and investigate all relevant and appropriate information and circumstances, with due regard to the fair treatment of complainants.*

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- *(iv) does not impose unreasonable barriers to complainants; and*
- *(v) must address and provide for, at least, the matters provided for in this Part.*
- *(b) An Insurer/Provider must regularly review its complaints management framework and document any changes thereto.*

UMAs and Intermediaries with Binders or other outsourced administrative mandates, should be offered guidance by the Insurers, which they represent, regarding the policies and procedures, which the Insurers require to be put in place for the registration and management of Complaints by those mandated entities. If there has been no such guidance, then it is suggested that UMAs and Binder Intermediaries first approach their Insurers to find out whether they require any specific content relating to the UMA's/Binder Holders' Complaints Management policies and procedures Insurers have an obligation to ensure that they have complete oversight of their outsourced service providers' operations, and this includes Complaints Management.

It should be noted that Insurers are obliged to report the statistics relating to complaints against them or their outsourced service providers, in terms of their Conduct of Business Returns, to the FSCA, thus they will define the nature and format of information and reports which they require.

DISCLOSURE NOTICE
Infinite Credit Underwriting Managers (Pty) Ltd
Registration Number 2007/018079/07
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This notice does not form part of the Insurance Contract (Policy) or any other document. It does however contain valuable information.

Introduction

The FAIS (Financial Advisory and Intermediary Services) Act (Act 37 of 2002) has been introduced to protect consumer rights and makes provision for

- Registration of brokers referred to as Financial Service Providers (FSP) who must comply with certain requirements such as academic qualifications and experience. The FSP must also comply with fit and proper requirements referring to honesty, competency, and solvency.
- The disclosure to you as the client of material information regarding:
 - details of the product supplier (Insurer).
 - details of the FSP.
 - details of the financial service.
- Your rights to lodge a complaint and seek resolution thereof through the FAIS Ombud offices.



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Insurers Disclosure

Name: Infiniti Insurance Limited
Physical Address: Block F, Upper Grayston Office Park,
152 Ann Crescent, Strathavon, Sandton
Postal Address: PO Box 23, Strathavon, 2031
Telephone: 011 718 1200
FAIS License: 35914
Email: compliance@infinitiafrica.com
Website: www.infinitiafrica.com

FAIS License Information

Services: Advice and Intermediary Services
Categories: Personal and Commercial – Non-Life Insurance.
FSP Number: 35914
Email address: compliance@infinitiafrica.com
Complaints: Direct your complaint to the above address or by email to
complaints@infinitiafrica.com
Professional Indemnity: Our Professional Indemnity policy is underwritten by Brit, underwritten by Lloyds.

Infiniti Insurance Limited is a licensed Non-Life Insurer, Company Registration Number: 2005/029823/06 and an authorised Financial Services Provider I FSP No. 35914

Compliance Officer Details of the Insurer

Name: Peet Pieterse
Authorised to outsource their service under licence CO 6897
Telephone: 011 718 1200
Postal Address: PO Box 23, Strathavon, 2031
Email address: compliance@infinitiafrica.com
Your Intermediary: Also referred to as your broker or Financial Service Provider (FSP). The name of your broker is reflected on your policy schedule.
Legal Status: Your broker is authorised by us in terms of an agency agreement to render advisory and
Intermediary services regarding our financial products in the categories they are
licensed
for.
Your broker is not a representative of Infiniti Insurance Limited and Infiniti Insurance
Limited
accepts no responsibility for their actions.
Your broker must disclose to you whether they hold professional indemnity insurance
or not.

Underwriting Manager

Underwriting on behalf of Infiniti Insurance Limited

Name: Infinite Credit Underwriting Managers Proprietary Limited
Reg No 2007/018079/07
Physical Address: Unit 8, Suite 3, First Floor, Old Trafford Office Park
186 Leith Road,
Bartlett, Boksburg,
1459, South Africa
Postal Address: Suite 178 Private Bag X3
Strubens Valley
1735
Telephone: 010 300 6291
Email: info@i-credit.co.za
FAIS License: FSP Number 46366

An authorized financial services provider FSP46366
Unit 8, Suite 3 Old Trafford Office Park, 186 Leith Road, Bartlett, Boksburg, 1459, Johannesburg
Reg;2007/018079/07 Tel: 010 300 6291 Website: www.i-credit.co.za
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FAIS License Information

Services: Advice and Intermediary Services
Categories: Category 1 Personal and Commercial – Non-Life Insurance
FSP Number: 46366
Email address: complaints@i-credit.co.za
Complaints: Direct your complaint to the above address or by email to complaints@i-credit.co.za
Professional Indemnity: Our Professional Indemnity policy is underwritten by Lombard Insurance Limited.
Fidelity Guarantee: The Underwriting Manager does hold a fidelity guarantee and does not collect premium.
Ownership: The Underwriting Managers is not owned by any Insurer and receive 100% of its total income from the Insurer.
Written Mandate: This certifies that the Insurer has granted a mandate to the Underwriting Manager to represent the Insurer to accept business and issue policies on behalf of the Insurer.
Infinite Credit Underwriting Managers only acts on behalf of Infiniti Insurance Limited.
Premium: Your premium is collected by Infiniti Insurance Limited.

Compliance Officer Details of Underwriting Manager

Name: Craig Ormrod
Associated Compliance
Telephone: 011 678 2533
Cell: 082 418 8844
Postal Address: PO Box 9655 Devon Valley 1709
Email address: craig@associatedcompliance.co.za

FAIS Ombudsman

All complaints relating to product advice given or intermediary services performed or not performed, claims and repudiations can be referred to the FAIS Ombud.

Physical Address: 125 Dallas Avenue Menlyn Central, Waterkloof Glen, Pretoria 0010
Postal Address: P O Box 41, Menlyn Park, 0063
Telephone: 012 762 5000
Share call: 086 066 3274
Email: info@faisombud.co.za
Website: www.faisombud.co.za

Customer Contact Division

Telephone: 0860FAISOM (0860324766) / 012 470 9080
Fax: 012 348 3447
Email address: info@faisombud.co.za
Website: <https://www.faisombud.co.za/>

NFO (National Financial Ombud Scheme)

Physical Address: 110 Oxford Road, Houghton Estate, Johannesburg, Gauteng, 2198
Telephone: 086 080 0900
WhatsApp: 066 473 0157
Email: info@nfosa.co.za

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Website: <https://nfosa.co.za/>

Financial Services Conduct Authority (FSCA)

Physical Address: 41 Matroosberg Road, Ashlea Gardens Pretoria, 0010.
Postal Address: PO Box 35655 Menlo Park 0102
Telephone: 012 428 8000
Toll Free: 0800110443
Website: www.fsc.co.za

Your Policy

Type of Policy: Personal / Commercial Lines – Non-Life Insurance
Premium: Premium is the amount you pay us for the cover under the policy. The premium payable
and frequency is reflected on your policy schedule or endorsement issued by the
Underwriting Manager.
period of grace. The premium is payable before inception or renewal of the policy, subject to a 15-day
ensure that your Broker Non-payment of the premium will result in contractual lapsing of the policy. Please
has explained the consequences of non-payment of premium to you.

Fees: Any fees payable by you to the Broker are separately disclosed on your policy schedule.
Broker Fees are separately disclosed on the policy.
Any binder fee payable to the Underwriting Manager (UMA) by the Insurer is
separately disclosed on your policy schedule where applicable. The binder fee is paid by the
Insurer to the UMA for fulfilling binder functions on the Insurer's behalf.
be Any additional fee charged by the intermediary (Broker) for additional services must
be specified and agreed to by the policyholder.

Commission: Any commission payable to the Broker by us is separately disclosed on your policy
schedule and may not exceed the maximum stated in the regulations for the specific class of
business.

Conflict of Interests: Our conflict of interest's policy and procedure is available on our website.

Complaints Resolution Procedure

Summary

The objective of the complaint's procedure is to ensure that policyholders are treated fairly. In certain instance you the policy holder may approach the Ombudsman for Short Terms Insurance, where the complaint constitutes a monetary claim up to R800 000, without incurring legal expenses. The steps need to be followed by you that enable you to approach the Ombudsman for Short Terms Insurance (OSTI) and or FAIS Ombud or the Financial Services Sector Conduct Authority (FSCA) for a determination on a complaint are set out below,

What is a complaint?

A complaint can only arise if:

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- Infinite Credit Underwriting Managers (Pty)Ltd and its representative contravened or failed to comply with a provision of the Act and as a result you have or are likely to suffer financial prejudice.
- e or our representative wilfully or negligently rendered a financial service which caused or is likely to cause financial prejudice.
- we treated you unfairly.

How do you lodge a complaint?

Inform Infinite Credit Underwriting Managers (Pty) Ltd in writing that you have a complaint and if possible complete our client complaint form.

What happens after this?

- We have 3 weeks to acknowledge receipt of the complaint if we cannot resolve the complaint in that period.
- We must resolve the complaint within 6 weeks.

What other rights do you have?

If after 6 weeks, we have not resolved the complaint, or the complaint has not been resolved to your satisfaction you may approach the FAIS Ombud within 6 months of the resolution by Infinite Credit Underwriting Managers (Pty) Ltd. You must complete a complaints registration form that you can download from the FAIS Ombud website.

A FULL COPY OF THE COMPLAINT RESOLUTION POLICY AND PROCEDURES IS AVAILABLE FROM OUR OFFICES

Complaints

If you would like to lodge a complaint regarding your Insurer or your Intermediary, please contact Infiniti Insurance Limited on 011 718 1200 or write to compliance@infinitiafrica.com

The Protection of Personal Information Act (“POPIA”) is effective 1 July 2021. POPIA regulates how we use, store, and destroy personal information and special personal information of individuals and juristic persons.

Please visit our website www.i-credit.co.za for more information around how we utilise, store, and destroy your personal information.

Other matters of importance

(a) You must be informed of any material changes to the information provided above

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- (b) If the information above was given to you verbally, it must be confirmed to you in writing within 30 days.
- (c) If any complaint to the Intermediary or Insurer is not resolved to your satisfaction, you may submit a complaint to the Short-Term Insurance Ombudsman.
- (d) Polygraph or any lie detector test is not obligatory in the event of a claim and failure thereof may not be the sole reason for rejecting the claim.
- (e) The Insurer and not the Intermediary must give reasons for rejecting your claim.
- (f) Your Insurer may not cancel your insurance merely by informing your Intermediary. There is an obligation to make sure the notice has been sent to you. The Insurer must inform you at least 31 days before the cancellation of the policy.
- (g) You are entitled to a copy of the policy free of charge.
- (h) If premium is paid by debit order it may only be in favour of one person and may not be transferred without your approval; and the Insurer must inform you at least 3 days before cancellation thereof, in writing, of its intention to cancel such debit order.

Warning

- (a) Do not sign any blank or partially completed application form.
- (b) Complete all forms in ink.
- (c) Keep all documents handed to you.
- (d) Make note of what is said to you.
- (e) Don't be pressurised to buy the products.
- (f) Incorrect or non-disclosure by you of relevant facts may influence an Insurer on any claims arising from your contract of insurance.

Sharing of Insurance Information

Insurers share information with each other regarding policies and claims with a view to prevent fraudulent claims and obtain material information regarding the assessment of risks proposed for insurance. By reducing the incidents of fraud and assessing risks fairly, future premium increases may be limited. This is done in the public interest and in the interest of all current and potential policyholders.

The sharing of information includes but is not limited to information sharing via the Information Data Sharing System operated TransUnion ITC on behalf of the SAIA. By the insurer accepting or renewing this insurance, you or any other person that is represented herein, gives consent to the said information being disclosed to any other insurance company or its agent.

You also give consent to the sharing of information regarding to the previous insurance policies and claims that you have had. You also acknowledge that information provided by yourself, or your representative may be verified against any legally recognised sources or databases.

By insuring or renewing your insurance, you hereby not only consent to such information sharing but also waive any rights of confidentiality with regards to underwriting or claims information that you have provided, or that has been provided by another person on your behalf.

In the event of a claim, the information you have supplied with your application together with the information you supply in relation to the claim, will be included and made available to the other insurers participating in the Information Data Sharing System.

Waiver of Rights

Section 21 of the Code of Conduct provides that no provider may request or induce in any manner a client to waive any rights or benefit conferred on the client by any provisions of this code, or recognise, accept, or act on any such waiver by the client and any such waiver is null and void.

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Fraud and Complaints Services

Fraud & Irregularity Reporting:

Confidential reporting by employees, intermediaries or policyholders of concerns, shortcomings, or potential non-compliance in respect of the insurer's policies, legal or regulatory obligations, or ethical considerations. Any suspicious or irregular activity can be reported to irregularityreporting@infinitiafrica.com.

Conflict of Interest Disclosure

We have considered the conflict-of-interest provision in terms of the FAIS Act 37 of 2002 and have not identified any actual or potential conflict of interest, either ownership interest, financial, third-party relationships, associates, or distribution channels as defined. We adopt a value base approach where the spirit of the legislation is embraced. This is reviewed at least once a year in consultation with an external independent compliance practitioner and reported to the FSCA. A conflict-of-interest management policy is available to the clients upon request.

Treating Customers Fairly (TCF)

Treating Customer Fairly (TCF) is a regulatory initiative which requires companies to consider how they treat their clients through all stages of the relationship and product life cycle. This has encouraged us to align our company culture and to reinforce the customer-centred services deliverable on which we base all our operations. Our approach has always been client-focussed, however, to always embrace TCF, we place good market conduct principles at the centre of our interactions with intermediaries and policyholders in meeting the needs of all stakeholders and bringing customer service to the forefront of our operations. We have implemented a TCF framework according to the guidelines provided by the Financial Sector Conduct Authority and contained in the Policyholder Protection Rules to ensure that we consistently deliver fair outcomes to our clients and enhance the services quality to clients.



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