



**SHIELD LIFE**<sup>®</sup>  
LIMITED  
*YOUR SHIELD FOR LIFE*

# COMPLAINTS POLICY

## SHIELD LIFE<sup>®</sup> LTD

*("the Company")*

### **Policy Statement**

The Shield Life Limited is committed towards rendering financial services with the proper due skill, care and diligence and in the best interests of its policyholders.

Despite the organisation's high service standards there may be instances where a policyholder nevertheless prefers to submit a formal complaint against the organisation. In such instances Shield Life Limited will adhere to the Complaints Policy.

### **Purpose**

This policy is intended to guide customers and staff to meet the organisation's complaints management process in respect of financial services. To ensure that our customers are treated fairly, and to ensure that our complaints management procedure is effective, efficient, transparent and accessible, any customer who lodges a complaint shall be provided with a written copy of this Policy and the Complaints Management Framework which we follow when a complaint is received.

### **Scope**

This Policy covers all individuals working at all levels, including managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term employees, casual staff and volunteers (collectively referred to as staff or employees). All staff is responsible for their own compliance with this Policy and for ensuring that it is consistently applied. All staff should ensure that they take the time to read and understand their roles and responsibilities in respect of it. Breach of this Policy will be dealt with under our Disciplinary Procedure and may be treated as gross misconduct which could result in dismissal.

### **Allocation of Responsibilities**

The Board of Directors of Shield Life Limited is responsible for effective complaints management.

The Board of Directors will therefore oversee and approve the effectiveness and implementation of this Policy.

The Board of Directors may delegate the internal complaint review and escalation process to the appropriate department and any queries relating to the aforementioned process must be directed to same.

## **Responsible and adequate decision-making**

Any person in Shield Life Limited that is responsible for making decisions or recommendations in respect of complaints generally or a specific complaint must:

- Be adequately trained;
- Have an appropriate mix of experience, knowledge and skills in complaints handling, fair treatment of policyholders, the subject matter of the complaints concerned and relevant legal and regulatory matters;
- Not be subject to a conflict of interest; and
- Be adequately empowered to make impartial decisions or recommendations.

## **Review**

The Policy shall be reviewed annually to ensure that it meets legal requirements and reflects best practice. All staff is to be trained in respect of this Policy and understand their roles and responsibilities in respect of it.