



MultiChoice (Pty) Ltd

**Complaints Management Framework,
Policy, and Procedures**

CARE CONNECT CREATE

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1. Purpose

The purpose of this policy is to provide guidelines for the effective and efficient management and resolution of complaints to ensure regulatory and service level compliance as well as to treat customers fairly.

The objective when dealing with policyholders on a day-to-day basis is to avoid the incidence of complaints as far as possible by ensuring that all processes that touch the policyholder directly or indirectly are performed in line with regulatory requirements, including Treating Customers Fairly outcomes, the FAIS General Code of Conduct and the Policyholder Protection Rules.

2. Applicability

This policy is applicable to MultiChoice (Pty) Ltd (“the Company”), including all its employees and outsourced partners. The Policy Owner is responsible for this policy as well as the related procedures, methodologies, and guidelines for the implementation of this policy.

3. Definitions, Acronyms and Abbreviations

Term	Definition
“business unit” or “BU”	operational structures which form part of a Segment: - MCSA - DStv Media Sales - SuperSport - General Entertainment - NMSIS, - Northen region - Western region - Southern region , each individually a business unit
“employee”	means all permanent employees, fixed term contractors and learners on a learnership programme
“ISP”	means independent service provider, an individual that is a service provider, and not an employee, that undertakes to render a service to a company in the Group, based on an ISP contract
“MCG”	means MultiChoice Group Limited
“MCSA”	MultiChoice (Pty) Ltd (and its subsidiaries), MultiChoice Support Services (Pty) Ltd, MultiChoice Investments (Pty) Ltd (and its subsidiaries), Orbicom (Pty) Ltd, NMS Properties (Pty) Ltd and GOtv Lesotho
“MultiChoice Group” or “the group”	MCG and its subsidiaries, also referred to as the Company in this document

“Policy owner”	is the person who is accountable for the function or business area which oversees a policy and is responsible for drafting, reviewing, obtaining the necessary approvals and implementing the policy.
“RoA”	MultiChoice Group Holdings B.V and its subsidiaries as well as MultiChoice Namibia (Pty) Ltd and MultiChoice Botswana (Pty) Ltd, and which have been divided into three business units also referred to as regions: - Northern region - Western region, and - Southern region
“SA”	MultiChoice South Africa Holdings (Pty) Ltd and its subsidiaries, which have been divided into five business units: - MCSA - DStv Media Sales - SuperSport - General Entertainment - NMSIS
“Segments”	notional operating structures which consist of MCG Corporate, SA, RoA, Showmax and Irdeto, and “Segment” shall mean any one of them
“subsidiaries”	shall have the meaning given in section 3 of the South African Companies Act, 71 of 2008 (as amended), save that the interpretation and application of this definition shall not be limited to South African companies
“third party contractor”	a service provider entity or individual who has been contracted to render a service to a company in the MultiChoice Group, based on a service level agreement

4. Overview

Complaints may be expressed by a customer about a product or service provided by the Company and outsourced partner, who will be responsible for consistent management of the complaints. The Company must assign regular quality checks to a designated manager and/or senior manager.

Careful complaints management can save the Company unwanted costs. Management's responsibility begins with the preparation of written policies and procedures for speedy and fair complaints resolution.

All persons who are responsible for making decisions or recommendations in respect of complaints shall be:

- adequately trained;
- have an appropriate mix of experience, knowledge and skills in complaints handling, fair treatment of customers, the subject matter of the complaints concerned and relevant legal and regulatory matters;
- not be subject to a conflict of interest; and



- adequately empowered to make impartial decisions or recommendations.

Complaints will be allocated to persons based on the complaint subject matter as follows:

- Reportable complaints:
 - Regulatory non-compliance - Head of Control: Compliance
 - Governance structures and/or processes – Company senior leadership
 - All other reportable complaints - Senior FAIS key individual: Complaints ("Senior FAIS KI") will further allocate reportable complaints for resolution in line with the below procedures)
- Non-reportable complaints - FAIS representatives

Non-reportable complaints will be managed and resolved within the Company's ordinary processes for handling policyholder queries. Reportable complaint means any complaint other than a complaint that has been:

- upheld immediately by the person who initially received the complaint; or
- upheld within the Company's ordinary processes for handling policyholder queries in relation to the type of policy or 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 Company in such a manner that the Company does not have a reasonable opportunity to record such details of the complaint as may be prescribed in relation to reportable complaints.

The Company must inform customers of the complaint outcomes in writing, including escalation options and timeframes.

5. Transparency, visibility, and accessibility of the complaints procedures

The Statutory and FAIS disclosures detail the procedures to follow in the event of a complaint and are published on the DStv website. The Statutory and FAIS disclosures are included in the correspondence pack sent to the policyholders. Complainants must submit their complaints in writing to the Company in one of the following ways:

- Handed in at any of the MultiChoice Customer Experience Centres. The Customer Experience Centre staff will scan and escalate the complaint to the Customer Care Financial Services team (via the electronic correspondence system)
- E-mailed to dcc@multichoice.co.za (linked to the electronic correspondence system).

However, if the complainant contacts the Company telephonically and is unable to submit his / her complaint in writing, a FAIS representative will do so on the complainant's behalf via the electronic correspondence system.



6. Administration and resolution

A complaints review process is implemented to ensure that both reportable and non-reportable complaints are evaluated and resolved timely. All reportable complaints are to be recorded in the reportable complaints register.

Receipt of all reportable complaints must be acknowledged via email or telephonically within five business days of receipt. The acknowledgement should provide the complainant with the following information:

- Contact details of the complaints handler or department that will be handling the reportable complaint (the assigned complaints handler is copied in on the email);
- Indicative timelines for addressing the reportable complaint;
- Details of the internal reportable complaints' escalation and review process if the complainant is not satisfied with the outcome of the resolution; and
- Details of escalation of reportable complaints to the office of a relevant ombud where applicable.

Reportable complaints will be resolved by the complaints handler or appropriate person within ten business days from the date of receipt of the reportable complaint. This time frame is extended where reportable complaints are escalated by either the complainant or complaints handler. The maximum extended period of time may not be longer than six weeks from the date of receipt of the reportable complaint to final resolution.

Complainants must be kept adequately informed of:

- The progress of the reportable complaint;
- Causes of any delay in the finalisation of a reportable complaint and revised timelines;
- The Company's decision in response to the reportable complaint; and
- Where the Company rejects the reportable complaint, the reasons for the decision, the applicable escalation process, and the relevant time frames.
- Where a complaint is upheld, any commitment by the Company to make a compensation payment, goodwill payment or to take any other action must be carried out without undue delay and within any agreed timeframes.

The complaints handler logs the following information in the reportable complaints register during the reportable complaints resolution process and uploads copies of all relevant evidence, correspondence, and decisions:

- All relevant details of the complainant not logged initially by the Senior FAIS KI;
- The subject matter of the reportable complaint;
- The reportable complaint findings;



- The reportable complaint categorisation;
- Received date, first and final communication dates;
- Escalation details where applicable;
- The outcome of the reportable complaint including reasons where applicable; and
- The progress and status of the reportable complaint.

Reportable complaints are categorised into the following categories:

- Policy or related product design;
- Information provided to policyholders;
- Advice;
- Policy performance;
- Service;
- Policy accessibility, changes, or switches;
- Complaints handling;
- Claims;
- Other; and
- Additional categories needed to further support the effectiveness of this complaints management framework, better manage conduct risks and effect improved outcomes and processes for the Company's policyholders.

The progress of the reportable complaints and turnaround times are electronically tracked in the reportable complaints register.

The Senior FAIS KI or manager and/or senior manager, where applicable, reviews responses to complex reportable complaints prior to the complaints handlers communicating these to the complainants.

The Senior FAIS KI reviews the logged reportable complaints and supporting documentation for completeness prior to closing the reportable complaint in the reportable complaints register.

7. Escalation procedure

In the event that the complaints handler is unable to resolve the reportable complaint him / herself, the complaints handler may escalate the reportable complaint to the appropriate manager and/or senior manager to assist with the resolution.

In the event that a complainant is not satisfied with the response to his / her reportable complaint or the progress of the reportable complaint or the complaints handler, the



complainant may escalate the reportable complaint to the Senior FAIS KI or manager and/or senior manager, where applicable, for further resolution.

8. Ombudsman and third-party resolution procedures

A complainant may at any stage refer a complaint to the office of the relevant Ombud or take such other steps as he / she may be advised. Such referral must be done in accordance with the provisions of relevant regulations and rules.

Any complaint not resolved internally by the Company within six weeks after receipt of the complaint, can be referred to the applicable Ombud by the complainant.

The Company provides documentation to the Ombud via email when requested, in a timely manner.

The Company monitors determinations, publications and guidance issued by any relevant Ombud with a view to identifying failings or risk in its own policies, services, or practices.

Best practice states that if complaints cannot be resolved directly between the customer and the Company, they should be referred to a third-party dispute resolution process. Third-party mechanisms use the services of unbiased individuals or panels to resolve disputes through conciliation, arbitration, and mediation.

Conciliation

A neutral conciliator brings the parties together and encourages a resolution of a mutually acceptable nature to the dispute.

Mediation

A neutral mediator becomes actively involved in negotiations between the parties. The mediator can propose a resolution but cannot dictate a settlement of dispute.

Arbitration

An independent panel or individual hears the facts on both side of a dispute and reaches a decision. Usually both parties have previously agreed to abide by the decision. In some systems only the business agrees in advance to abide by the outcome of the arbitration.

9. Monitoring

The Compliance key individual (“Compliance KI”) reviews the electronic correspondence system complaints folder on an ad-hoc basis for reportable complaints not yet logged and follows up with the Senior FAIS KI where needed.

The Senior FAIS KI checks the progress timelines on a daily basis and follows up with the complaints handlers where needed.

Quality checks are performed by a manager and/or senior manager on a monthly basis in line with the risk tolerances. The manager and/or senior manager, where applicable, randomly selects a sample of reportable complaints from the reportable complaints register to assess logged detail, turnaround times and supporting information for policy compliance and for, validity, accuracy, and completeness. The manager and/or senior manager, where applicable, also ensures that discrepancies are resolved in a timely manner. Periodic root cause analysis of complaints received may also be used to identify systemic issues.

10. Complaints relating to the Company’s service providers

Management of complaints relating to the Company’s service providers, insofar as such complaints relate to services provided in connection with the Company’s policies or related services:

- The Company administers and resolves all complaints as part of its complaints management process;
- Senior manager has regular meetings with the Company’s third parties, and complaints are discussed at these meetings;
- The Compliance KI and manager and/or senior manager performs quality assurance reviews in line with the risk tolerances; and
- The third parties refer complaints via email to the Company and vice versa where needed.

11. Reporting

Reportable complaints are further monitored and discussed by the manager and/or senior manager at the management meetings.

The reportable complaints information discussed includes the following:

- Number of reportable complaints received;



- Number of reportable complaints per category;
- Number of reportable complaints upheld;
- Number of reportable complaints rejected and reasons for the rejection;
- Number of reportable complaints escalated by complainants to the internal complaints escalation process;
- Number of reportable complaints referred to an Ombud and outcomes;
- Number and amounts of compensation payments made;
- Number and amounts of goodwill payments made;
- Service levels; and
- Total number of reportable complaints outstanding.

The reportable complaints information recorded are scrutinised and analysed by the manager and/or senior manager on an ongoing basis and utilised to manage conduct risks and effect improved outcomes and processes for the policyholders, and to prevent recurrences of poor outcomes and errors.

The material results of this analysis and resulting management action are reported to the board. The board provides the necessary oversight.

Reportable complaints information is reported to the Regulators within the prescribed timeframes.

12. Deviation

Any deviation from this policy must be discussed with the Policy Owner and senior manager. Such discussion should be documented, detailing the reason for the deviation as well as the alternative process to be followed. The approver of this policy or designated person is to approve the alternative process and the requestor and owner of the policy must maintain a copy of the approved deviation, for record- keeping and auditing purposes.

13. Policy review process

This policy must be reviewed to its adherence to the Prudential Standard and the FAIS Board Notice 194 of 2017 periodically, as, and when necessary, but at least every three years.

The manager and/or senior manager should be informed of significant changes within the operating environment, legislation or regulation impacting on the risk management function, and where changes were made or are required; this policy needs to be amended and re-submitted for final approval.

14. Non-compliance with policy

Any group, organisation, or business area, including individuals who are subject to this policy found not to comply with the provisions as set out in this policy or any amendment thereto, shall be subjected to appropriate disciplinary and legal action.

15. Document properties

MultiChoice Group		Document Number		
		MCG-MCSA-CG-POL-102		
Complaints Management Framework Policy and Procedures		Effective Date		
		31/07/2025		
	Name and Surname	Position	Signature	Date
Policy owner:	Johann Stander	Executive Head: Ethics and Legal Compliance		31/07/2025
Reviewed by:	Yuvika Rampal	Manager: Customer Care	<small>Signed by Yuvika Rampal Signed at 2025-07-28 09:32:26 +0200 Reason Approved By Yuvika Rampal From the Manager</small>	31/07/2025
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Approved by:	Johann Stander	Executive Head: Ethics and Legal Compliance	<small>Signed by JOHANN STANDER Signed at 2025-07-28 10:37:57 +0200 Reason I approve this document JOHANN Stander</small>	31/07/2025
	Byron du Plessis	CEO: MCSA	<small>Signed by BYRON DU PLESSIS Signed at 2025-07-28 10:37:57 +0200 Reason I approve this document Byron Du Plessis</small>	

Rev No.	Rev Date	Section/s	Description of Change
1	31/07/2025	All	Converting NMSIS policy to MultiChoice (Pty) Ltd following the Sanlam/Santam acquisition.