



LionHealth is a division of **LionLife**

TREATING CUSTOMERS FAIRLY

Version 2

Policy Owner: Head of Sales and Head of Operations

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1. Introduction

Lion Health is a health insurance product underwritten by Lion of Africa Life Assurance Company Limited.

At Lion of Africa Life Assurance Company Limited (“**Lion Life**”) we understand that the customer is at the heart of our business and that the fair treatment of customers is essential in realising the strategic objectives of this company. As part of our overall approach we are fully committed to treating our customers fairly and as such we endeavour to consistently deliver fair outcomes to our customers and take responsibility for the company and our employees.

In achieving fair customer treatment outcomes Lion Life is embedding a culture of treating customers fairly (“**TCF**”) and making customers central to strategic decisions taken. We commit to consider treatment of our customers at all stages of our relationship with the customer, from product design and marketing, through to the advice, point-of-sale and after-sale stages. This is achieved through the six TCF outcomes.

2. The six TCF Outcomes

2.1. Outcome 1: Culture and Governance

Customers are confident that they are dealing with a financial services provider where the fair treatment of customers is central to its culture;

Like any other requirement in an organisation, the culture is set at the top and filters down to the rest of the organisation. Lion Life has competent management that understands the importance of customers and the value they add to the company, and thus has adopted as one of its core values “Customer Centricity”. This means putting the customer’s needs first and ensuring we meet their expectation –

- in a practical manner;
- readily available to assist our customers;
- in always communicating in a clear, respectful and compassionate manner; and
- going over and above to ensure that our clients are happy and satisfied with our service.

This will be achieved through –

- recruiting competent staff;
- training staff;
- continuous awareness drive;
- conducting customer satisfaction survey; and
- monitoring complaints.

This feedback will be used to gauge the culture for information and decision making. This will ultimately be a consideration in strategic initiatives of the company. Furthermore, Lion Life will be revising all employment, third party and performance contracts in the next 12 months to incorporate TCF performance criteria.

2.1.1. Key stakeholders in ensuring for fair treatment are:

2.1.2. Management

Management is responsible for embedding the culture of treating customer fairly and being centric to the organisation. Some of management measures will be continuous monitoring, customer satisfaction surveys and complaints/whistleblowing handling.

2.1.3. Staff

Staff is generally responsible for the day to day execution of management controls and report any deficiencies. Another responsibility would be to collect data that would enable Lion Life to improve its controls and enhance the customer experience.

2.1.4. Compliance

Compliance is tasked with training and driving awareness in general and as it relates to Lion Life. Also, to conduct independent and objective monitoring on TFC aspects.

2.1.5. Internal Audit

Conduct independent and objective reviews.

2.2. Outcome 2: Product and Services

Products and services marketed and that are sold in the retail market are designed to meet the needs of identified customer groups and are targeted accordingly

Lion Life as an insurer realised the importance of designing a product that is suitable for the identified customer base, and not just designing a product for sale. This approach contributes to the client centric value and it also helps in the company becoming more sustainable. Market research is done up front to understand our target market's needs and shortfall, this often an indicator of what product must be considered and any auxiliary benefits. The end goal is to give a valuable product to the market that will meet the needs of our customer base or target market.

To add to the above, all new product designs will have to be signed off by TCF Committee to ensure it is aligned with the company's strategic goals and values, this also includes sign off by the statutory actuary to ensure the assumptions/estimates are sound. There will also be approvals at the various stages of the implementation to ensure compliance and that interests of customers are always considered. Compliance and Risk Management teams are consulted throughout the process to ensure whatever decisions taken do not prejudice the customer directly or indirectly.

Lion Life distributes its product through various distribution channels; it is our commitment to take the product closer to our customers' communities in efforts to show how valuable they are to Lion Life. Lion Life makes use of Tied advisers and independent brokerages to ensure they gain access to the targeted market.

Further the company is rolling out a new Sales model that will take the products to our targeted customer base. The new Sales model will be regularly monitored to ensure it achieves objectives of treating customers fairly and that the industry is professionalised as per Financial Advisory and Intermediary Services Act. Lion Life ensures that at first all its tied advisers are trained at onboarding and secondly, gets continually trained during their lifecycle to ensure product and product information is relayed correctly. In addition, we will conduct routine checks on the third parties that distributes our financial products to mitigate risk of unfair treatment to customer.

The aim is to provide a mitigation tool to a customer or potential customer on unmitigated risks and to provide cover benefit for a risk event.

The product will be reviewed as and when required to ensure it still performs as expect and does not prejudice the customer at any stage of the product life cycle.

2.3. Outcome 3: Disclosure

Customers are given clear information and are kept appropriately informed before, during and after the time of contracting

Lion Life shall all the time communicate with its customers and potential customers in a dignified manner. Any communication to customer or potential customer will be –

- in plain language;
- not misleading;
- provided using an appropriate medium, taking into account the complexity of the information being provided; and
- in clear and readable print size, spacing and format.

Information provided will enable a customer or potential customer to understand the features of a financial product or policy and help the customer or potential customer understand whether it meets the customer's or potential customer's requirements. In determining the level of information to be disclosed Lion Life will consider the terms and conditions, benefits that will be due, exclusions and limitation and whether information was previously provided.

A potential customer will be appropriately informed before a business relationship is entered into to put the person in a position to make an informed decision. Information to be disclosed, inter alia,

- Name of the insurer and the financial service provider;
- The representative mandate;
- Types of financial products the company is providing;
- Details on the recommended benefits; and
- Terms and conditions as it apply.

Lion Life will ensure that it continuously keeps the customer informed during the business relationship of information that is pertinent to stay informed and make informed decision. Lion Life will be sending out annual policy statements to all customers of any active benefits with a brief summary of the key information. Lion Life will also in addition, disclose to the customer information on any contractual changes during the duration of the policy.

2.4. Outcome 4: Suitable advice

Where customers receive advice, the advice is suitable and takes account of their circumstances.

Lion Life, as a registered insurer and an authorised financial services provider knows the importance of providing suitable advice and implications of inferior quality advice. To safeguard the interests of the customers Lion Life is implementing the following:

- 2.4.1 A refurbished sales distribution model for both the tied distribution and the alternative distribution. This to embed a customer centric culture that Lion Life has adopted. Regardless of the distribution channel used, Lion Life intends to make the customer experience a seamless and transparent one to ensure customer is timeously informed with adequate detail to make informed decisions.
- 2.4.2 Lion Life will appointment competent representatives. These representatives will undergo training to ensure they understand Lion Life's objectives and values, especially what it means to be customer centric and what is expected from them as representatives of the company. Lion Life will further have annual refresher training and other interventions to ensure its representative are adequately equipped to perform their duties.
- 2.4.3 Advice delivered to policyholders will be reviewed by our competent sales managers and the key individuals to ensure that the advice process has been followed and customer provided with the required information. All policy application forms are further quality checked by the New Business team with the applicant/potential policyholder before finalising the policy application.
- 2.4.4 Compliance functions will be performing sample checks of the quality and completeness of the customer onboarding process. This is to ensure that their requirements are adhered to and the customer has not been disadvantaged and any point.

2.5. Outcome 5: Performance expectations & service

Customers are provided with products that perform as firms have led them to expect, and the associated service is both of an acceptable standard and what they have been led to expect.

Lion Life is continuously trying to ensure for a better customer experience and a customer journey that ensures that we deliver as promised. In ensuring this:

- 2.5.1. Lion Life has service level agreements with all its intermediaries that binds all parties to deliver as promised. Lion Life will also be reviewing some of the customer services components of that parties as part of annual reviews to establish whether they are functioning as intended and do not prejudice the customer in any way.
- 2.5.2. To ensure that the products performance or behaviours produce the results as predetermined and do not adversely impact the customer adversely, Lion Life performs ad hoc reviews on the products. We also monitor the regulatory environment for developments that impact on the products and services we deliver to ensure we are always aligned and constantly deliver as per our promise.
- 2.5.3. We regularly review our internal process to ensure that we constantly improve the way we deal with our customers. This includes but not limited to automating manual processes and being efficient by minimising duplications.
- 2.5.4. Another control is reviewed performed by our Compliance and the Internal Audit functions that assess the adequacy and efficiency of our internal controls in ensuring compliance with legislative and business requirements, this includes checks on the fair treatment of customers.

In addition to the above mitigations, Lion Life also uses other sources of data to improve processes that will enable for a better customer experience.

2.6. Outcome 6: Claims, complaints, switches

Customers do not face unreasonable post-sale barriers when they want to change a product, switch providers, submit a claim or make a complaint.

It is Lion Life's commitment to ensure that all its employees abide to the customer centric value that has been adopted and that its system supports this value throughout the customer's life stage. It is also our aim to receive ongoing feedback from our customers to ensure we continue to enhance their experience when dealing with us.

As part of mitigating post-sale barriers and enhancing customer experience, Lion Life has a dedicated client service team that manages customer queries to ensure for quality and efficient management of customer relationship.

Lion Life is regularly seeking ways to improve the customer service experience in our attempt to deliver services as promised, to become more efficient and helpful to customers and potential customers. Lion Life employees in particular new business, claims and complaint departments shall comply with the approved client onboarding, claims and complaints policies to ensure customers do not face post sales barriers.

We are committed to ensuring that we continuously monitor management information relating to complaints, claims and switching processes to identify trends of poor customer treatment and to implement corrective measures to ensure customers do not face any post sale barriers when dealing with Lion Life.

3. Other process that enables TCF

- 3.1 Lion Life's Board has adopted a TCF Committee to ensure customer treatment becomes a central component of discussion at the very top of the organisation.
- 3.2 Several policies/documents have been developed that promotes TCF that is Conflict of Interest Management Policy and Complaints Claims Management Framework.
- 3.3 Training in effort to embed TFC as a culture, not just a standalone item.

4. Miscellaneous

- 4.1 Ownership of this policy vests with the TCF committee. The duty to adhere to the letter and spirit lays with each employee and third parties of Lion Life.
- 4.2 Breach of this policy may be managed through the disciplinary code.

5. Review

This policy will be reviewed annually to ensure it still meets intended objectives.

6. Document history

Date	Version	Action	Executor
May 2015	V1- TCF2015	Approved	Actuarial
April 2020	V2-TCF2020	Draft	Legal and Compliance

7. Operational Approvals

Date	Version	Action	Name
April 2020	V2- TCF2020	Approval and Recommendation	MANCO

8. Governance Approvals

Date	Version	Action	Executor
May 2015	V1- TCF2015	Approved	TCF Committee and Audit Committee
July 2020	V2-TCF2020	Approved	TCF Committee
Aug 2020	V2-TCF2020	Approved	Board