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| **Original Date:** 2025/05/01<br>**Date Issued**: 2025/08/01<br>**REVISION No**: 1 | CHAMPIONS INSURANCE COMPANY (PRIVATE) LIMITED | **TREATING CUSTOMERS FAIRLY (TCF) MANUAL** |



| | TITLE | SIGNATURE | DATE |
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| Prepared by: | **HEAD OF COMPLIANCE**<br>Full Name | [signature] | 1/8/2025 |
| Recommended by: | **Managing Director**<br>Full Name: | | |
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## 1. AUTHORISATION AND PURPOSE

### 1.1 Authorisation

This Treating Customers Fairly (TCF) Manual has been developed to guide Champions Insurance in implementing the requirements of the Insurance and Pensions Commission's Treating Customers Fairly Framework issued in February 2021.

The IPEC Framework was issued in terms of section 3 of the Insurance and Pensions Commission (Issuance of General Guidelines and Standards) Regulations, 2020, published in Statutory Instrument 69 of 2020. It establishes market conduct principles and standards intended to protect policyholders and other consumers.

This Manual shall be read together with:

- The Insurance Act [Chapter 24:07];
- Applicable regulations, guidelines and standards issued by the Insurance and Pensions Commission (IPEC);
- Champions Insurance's Board-approved policies and procedures;
- Product-specific policy wordings;
- Underwriting, claims, complaints and customer service procedures; and
- Any other applicable legislation and regulatory requirements.

*Where there is any inconsistency between this Manual and applicable legislation or a regulatory requirement, the applicable legislation or regulatory requirement shall prevail.*

## 2. INTRODUCTION

Insurance products are often complex and may involve an imbalance of information and technical knowledge between insurance service providers and consumers. Customers may therefore enter into insurance contracts without fully understanding their rights, obligations, benefits, exclusions and limitations.

Champions Insurance recognises that the fair treatment of customers is essential to:

- Consumer protection;
- Maintaining confidence in the insurance sector;
- Building sustainable customer relationships;
- Promoting ethical conduct;
- Reducing conduct and reputational risk; and
- Supporting the long-term sustainability of the Company.

Treating Customers Fairly shall therefore not be regarded as a separate compliance exercise. It shall form part of the Company's culture, decision-making processes, strategic planning and day-to-day operations.

The Company shall apply TCF principles throughout the insurance product lifecycle, from product design and marketing to sale, policy administration, claims handling, complaints management and contract termination.

## 3. DEFINITIONS

For purposes of this Manual:

**3.1 Board**
Means the Board of Directors of Champions Insurance.
**3.2 Consumer or Customer**
Means policyholders, third-party claimants and beneficiaries.
**3.3 IPEC or Commission**
Means the Insurance and Pensions Commission of Zimbabwe, and the terms may be used interchangeably.
**3.4 Insurance Service Provider**
Means an insurer regulated by IPEC.
**3.5 Treating Customers Fairly (TCF)**
Means treating consumers in a way that is not detrimental to them.
**3.6 TCF Framework**
Means the Treating Customers Fairly Framework issued by the Insurance and Pensions Commission.
**3.7 Customer Outcome**
Means the result experienced by a customer as a consequence of the Company's products, services, conduct, decisions or processes.
3**.8 Vulnerable Customer**
Means a customer whose personal circumstances may affect their ability to understand, access, use or make informed decisions regarding an insurance product or service.

## 4. OBJECTIVES OF THE TCF MANUAL

The objectives of this Manual are to:

1. Ensure the fair treatment of Champions Insurance customers.
2. Provide principles and internal standards for implementing TCF throughout the insurance product lifecycle.
3. Promote consumer protection and education.
4. Embed the fair treatment of customers into the Company's culture.
5. Ensure that products and services meet the needs of identified customer groups.
6. Ensure that customers receive clear, fair and non-misleading information.
7. Promote suitable advice and responsible sales practices.
8. Ensure that products and services perform as customers have been led to expect.
9. Ensure that customers do not face unreasonable post-sale barriers when changing products, submitting claims or lodging complaints.
10. Establish clear responsibilities for the Board, Management and employees.
11. Establish systems for monitoring, measuring and reporting customer outcomes.
12. Restore and maintain confidence in Champions Insurance and the insurance industry.

## 5. SCOPE AND APPLICATION

This Manual applies to all Champions Insurance business units and operations, including:

- The Board of Directors;
- Senior Management;
- Compliance and Risk;
- Underwriting;
- Sales and Marketing;
- Claims;
- Finance and Collections;
- Customer Service;
- Information Technology;
- Human Resources;
- Agents and other intermediaries;
- Assessors;
- Repairers and service providers;
- Outsourced service providers; and
- Any other person acting on behalf of Champions Insurance.

**The principles in this Manual apply throughout the customer journey and product lifecycle:**

1. Product design;
2. Product approval;
3. Marketing and promotion;
4. Sales and distribution;
5. Underwriting;
6. Policy issuance;
7. Premium collection;
8. Policy administration;
9. Customer communication;
10. Claims handling;
11. Complaints handling;
12. Renewals and amendments;
13. Cancellation and termination; and
14. Post-sale service.

## 6. TCF GOVERNING PRINCIPLE

Champions Insurance shall conduct its business in a manner that places the fair treatment of customers at the centre of its corporate culture.

Every employee and person acting on behalf of the Company shall consider the following question when making a decision:

"Will this decision result in a fair outcome for the customer, while remaining consistent with the policy contract, applicable law and sound insurance practice?"

Fair treatment shall not depend solely on whether a customer expresses satisfaction or dissatisfaction. A customer may be satisfied despite not understanding their rights, while another may be dissatisfied with a decision that has nevertheless been made fairly and in accordance with the policy.

The Company shall therefore assess fairness objectively by reference to customer outcomes, conduct, processes, communications and compliance with applicable requirements.

## 7. THE SIX TCF OUTCOMES

Champions Insurance adopts the six regulatory and supervisory TCF outcomes as the foundation of its customer fairness framework.

### 7.1 OUTCOME 1: FAIR TREATMENT IS CENTRAL TO THE CORPORATE CULTURE

Outcome

Customers shall be confident that they are dealing with an organisation where the fair treatment of customers is central to the corporate culture.

Champions Insurance Standard

TCF shall be the Company's way of conducting business. It shall be driven by the Board and Senior Management and cascaded throughout the organisation.

Implementation Requirements

Champions Insurance shall:

- Embed TCF principles in its strategic planning and business objectives.
- Ensure that the Board and Management provide visible leadership on customer fairness.
- Apply TCF throughout the product lifecycle.
- Provide employees with TCF training appropriate to their roles.
- Include TCF expectations in relevant employee performance management processes.
- Maintain evidence demonstrating how TCF principles have been considered, discussed, implemented, reviewed and monitored.
- Provide the Board and Senior Management with relevant management information on customer outcomes.
- Investigate and intervene where there is evidence or suspicion that customers are not being treated fairly.

**Evidence of Implementation**

The Company shall maintain, where applicable:

- Board and Management meeting minutes;
- TCF training records;
- TCF monitoring reports;
- Customer complaints reports;
- Claims turnaround reports;
- Customer feedback;
- Product review documentation;
- Internal audit and compliance reports;
- Conduct risk registers; and
- Corrective action plans.

## 7.2 OUTCOME 2: PRODUCTS AND SERVICES ARE DESIGNED FOR IDENTIFIED CUSTOMER GROUPS

Outcome

Products and services marketed and sold shall be designed to meet the needs of identified consumer groups and targeted accordingly.

Product Governance Requirements

Before a product is introduced or materially amended, Champions Insurance shall consider:

- The target market;
- Customer needs;
- The purpose of the product;
- The benefits offered;
- Key exclusions and limitations;
- Affordability and pricing;
- Potential conduct risks;
- Appropriate distribution channels;
- Training requirements for sales personnel;
- The operational capacity to administer the product;
- Claims handling capability; and
- Reinsurance arrangements where applicable.

**Champions Insurance shall:**

1. Carry out appropriate research to understand the target customer and their needs.
2. Design products and services that are appropriate for the target market.
3. Ensure marketing material is clear and not misleading.
4. Use appropriate distribution channels.
5. Ensure that sales agents and relevant intermediaries are appropriately and regularly trained.
6. Avoid mis-selling for the purpose of generating premium income.
7. Ensure that promotional material accurately reflects what the product or service does.
8. Target promotional material at the appropriate customer group.
9. Periodically review products to determine whether they continue to deliver fair customer outcomes.

## 8. PRODUCT APPROVAL AND REVIEW PROCESS

### 8.1 New Products

All new products shall be subject to an appropriate internal approval process before launch.

The approval process shall document:

- Product name and purpose;
- Target market;
- Customer needs addressed;
- Product benefits;
- Significant exclusions;
- Conditions and limitations;
- Pricing methodology;
- Distribution strategy;
- Customer communications;
- Claims process;
- Reinsurance implications;
- Operational requirements;
- Key conduct risks; and
- Measures to prevent foreseeable customer detriment.

## 8.2 Product Review

Products shall be reviewed periodically and where:

- Significant customer complaints arise;
- Claims experience indicates unexpected outcomes;
- There are significant changes in the target market;
- Regulatory requirements change;
- A product is materially amended; or
- There is evidence that customers are not receiving the expected benefits.

# 9. OUTCOME 3: CLEAR INFORMATION BEFORE, DURING AND AFTER THE POINT OF SALE

## 9.1 Outcome

Customers shall be provided with clear information and kept appropriately informed before, during and after the point of sale.

## 9.2 Champions Insurance Standard

All customer information, whether verbal or written, shall be:

- Clear;
- Fair;
- Accurate;
- Relevant;
- Timely;
- Not misleading;
- Presented in language appropriate to the intended customer; and
- Sufficient to enable informed decision-making.

The Company shall avoid unnecessary technical language that may confuse customers.

## 9.3 Pre-Sale Information

Before a customer purchases insurance, Champions Insurance shall provide sufficient information regarding:

- The nature of the insurance cover;
- Benefits and scope of cover;
- Key exclusions and limitations;
- Premium payable;
- Excesses or deductibles;

- Material conditions;
- Policy period;
- Cancellation or termination conditions;
- Claims notification requirements; and
- Any other information necessary for an informed decision.

*The Company shall communicate both the benefits and relevant limitations of a product.*

**9.4 Information at the Point of Sale**

At the point of sale, the Company and its representatives shall explain relevant product characteristics and ensure that customers have sufficient information to understand:

- What they are purchasing;
- How the product benefits them;
- The key limitations and exclusions;
- Their obligations under the contract; and
- Applicable charges, penalties or other financial implications.

**9.5 Post-Sale Information**

After the point of sale, customers shall be kept appropriately informed about material developments affecting their insurance policy.

Where there is a material change, the customer shall be:

- Informed timeously;
- Provided with reasons for the change, where appropriate; and
- Informed of available options relating to the product.

9.6 Communication Records

Champions Insurance shall maintain appropriate records of material customer communications.

## 10. OUTCOME 4: SUITABLE ADVICE

10.1 Outcome

Where customers receive advice, the advice shall be suitable and take account of their circumstances.

10.2 Champions Insurance Standard

The Company recognises that employees, agents and intermediaries may provide advice by virtue of their insurance expertise.

Any advice provided shall:

- Be in the customer's best interests;
- Take account of the customer's circumstances;
- Be appropriate to the customer's needs;
- Not be driven solely by premium generation;
- Not encourage a customer to purchase an unsuitable product; and
- Not recommend a product that is unlikely to provide reasonable value to the customer.

### 10.3 Training

Champions Insurance shall ensure that registered agents and other persons providing advice or selling products on its behalf are:

- Properly trained;
- Competent in the products they distribute;
- Kept informed of relevant regulatory and legislative changes; and
- Subject to appropriate refresher training.

### 10.4 Prohibited Conduct

Employees, agents and intermediaries shall not:

- Misrepresent product benefits;
- Conceal material exclusions;
- Recommend an inappropriate product;
- Manipulate customer information to secure a sale;
- Place business under an incorrect risk classification;
- Use pressure-selling techniques; or
- Prioritise personal remuneration over a fair customer outcome.

## 11. OUTCOME 5: PRODUCTS PERFORM AS CUSTOMERS HAVE BEEN LED TO EXPECT

### 11.1 Outcome

Customers shall be provided with products that perform as they have been led to expect, and associated services shall be of an acceptable standard.

### 11.2 Champions Insurance Standard

The Company shall deliver on promises made to customers during marketing, sale and policy administration.

This requires consistency between:

- Marketing material;
- Sales representations;
- Policy documentation;
- Operational processes;
- Claims practices; and
- The actual service received by customers.

### 11.3 Quality Management

Champions Insurance shall implement appropriate quality management and review processes to assess whether:

- Products meet their stated objectives;
- Customer needs are being met;
- Services are delivered to an acceptable standard;
- Claims and policy administration processes operate as intended; and

- Customer expectations are reasonably aligned with actual product performance.

**The Company may use:**

- Customer surveys;
- Questionnaires;
- Feedback forms;
- Customer care calls;
- Complaints analysis;
- Claims data;
- Internal audits; and
- Service provider performance reports.

## 12. OUTCOME 6: NO UNREASONABLE POST-SALE BARRIERS

12.1 Outcome

Customers shall not face unreasonable barriers when they wish to:

- Change a product;
- Switch providers;
- Submit a claim;
- Lodge a complaint; or
- Exercise another contractual right.

### 12.2 Champions Insurance Standard

The Company shall ensure that its processes do not unnecessarily prevent, discourage or delay customers from exercising legitimate rights.

Post-sale barriers may arise from:

- Complex procedures;
- Unreasonable documentation requirements;
- Excessive penalties;
- Unnecessary delays;
- Poor accessibility;
- Inadequate customer information; or
- Internal processes that make it unnecessarily difficult to submit a claim or complaint.

Such barriers shall be identified and addressed.

## 13. CLAIMS MANAGEMENT AND FAIR CUSTOMER OUTCOMES

### 13.1 General Principle

Claims shall be handled fairly, objectively, consistently and without unreasonable delay.

The claims process shall not impose unnecessary barriers on valid claimants.

### 13.2 Claims Registration

Upon notification of a claim, the Company shall:

- Register the claim promptly;
- Provide the customer with a claim reference where applicable;
- Explain the claims process;
- Inform the customer of required information and documentation; and
- Provide appropriate contact details for enquiries.

### 13.3 Claims Assessment

Claims shall be assessed based on:

- The applicable policy terms;
- Available evidence;
- Relevant risk information;
- Professional assessments where required; and
- Applicable legal and regulatory requirements.

Claims decisions shall be appropriately documented.

### 13.4 Claims Communication

Customers shall be kept informed of material developments in the claims process.

Where delays occur, the Company shall communicate:

- The reason for the delay;
- Any outstanding information or process;
- The next steps; and
- Where possible, the anticipated timeframe for further progress.

### 13.5 Claims Repudiation

A claim shall not be repudiated arbitrarily or without proper consideration.

Where a claim is declined or partially declined, the customer shall be provided with:

- The decision;
- The basis for the decision;
- Relevant policy provisions where applicable; and
- Information regarding available complaint or appeal mechanisms.

### 13.6 Claims Settlement

Valid claims shall be settled as promptly as reasonably possible after completion of the necessary assessment and fulfilment of applicable requirements.

Unjustified delays in settling valid claims constitute a significant customer fairness risk and shall be monitored and escalated.

## 14. COMPLAINTS HANDLING

14.1 Complaints Handling Unit

Champions Insurance shall maintain a formal complaint handling function.

The function shall be staffed or overseen by appropriately senior officials who are able to adjudicate complaints or appeals fairly and without prejudice.

### 14.2 Complaint Registration

All complaints shall be:

- Recorded in complaints register;
- Assigned a reference number where appropriate;
- Acknowledged;
- Investigated; and
- Resolved or escalated.

**14.3 Fair Investigation**

Complaints shall be investigated objectively and without prejudice.

The investigation shall consider:

- The customer's complaint;
- Relevant policy documentation;
- Customer communications;
- Internal records;
- The conduct of employees or intermediaries; and
- Relevant regulatory and contractual requirements.

**14.4 Customer Communication**

Customers shall receive appropriate information concerning:

- Receipt of their complaint;
- The complaint process;
- Progress where a complaint remains unresolved;
- The outcome; and
- Available escalation or appeal mechanisms.

14.5 Right of Appeal

Where a customer is aggrieved by a decision of Champions Insurance, the customer shall be informed of their right to complain or appeal to the Insurance and Pensions Commission, where applicable.

14.6 Complaint Analysis

The Complaints Handling Unit and Management shall analyse complaints to identify:

- Recurring issues;
- Root causes;
- Product weaknesses;
- Service failures;
- Employee conduct concerns; and
- Emerging customer detriment.

Appropriate corrective action shall be implemented.

## 15. TYPICAL EXAMPLES OF UNFAIR TREATMENT

The following are examples of conduct that Champions Insurance shall guard against:

### 15.1 Claims

- Unjustified delays in settling valid claims.
- Failure to appropriately address the consequences of unjustified claims delays where legally or contractually required.
- Unjustified repudiation of claims.
- Imposing unnecessary documentation or procedural barriers.

### 15.2 Sales and Marketing

- Misleading marketing material.
- Promising claims settlement timeframes without adequate systems or capacity to deliver.
- Highlighting only the advantages of a product while failing to disclose material exclusions or limitations.
- Using unqualified or unlicensed personnel to sell insurance products.
- Mis-selling products for the purpose of generating premium income.
- Selling products that are unsuitable for the target customer.

### 15.3 Product Design

- Designing inappropriate products.
- Failing to ensure that products meet the needs of the identified target market.
- Promoting products in a manner that creates unrealistic customer expectations.

### 15.4 Customer Service

- Failing to provide customers with material information.
- Using confusing or unnecessarily technical communication.
- Failing to respond appropriately to complaints and queries.
- Creating unreasonable post-sale barriers.

These examples are illustrative and are not exhaustive.

## 16. BOARD RESPONSIBILITIES

The Board shall:

1. Provide direction and monitor the delivery of TCF to customers.
2. Approve and adopt a TCF policy and related framework.
3. Ensure that the TCF framework is regularly reviewed.
4. Ensure that TCF performance forms part of management information submitted to the Board.
5. Ensure that significant complaints and customer queries are appropriately and timeously addressed.
6. Promote a corporate culture in which customer fairness is central to decision-making.
7. Consider material customer conduct risks.
8. Require appropriate investigation and corrective action where there is evidence or suspicion of unfair customer treatment.

## 17. MANAGEMENT RESPONSIBILITIES

Management shall:

1. Include TCF principles in strategic and operational plans.
2. Implement the requirements of this Manual.
3. Ensure that employees receive appropriate TCF training.
4. Monitor employee performance against TCF expectations.
5. Maintain an effective complaint handling function.
6. Ensure that customers are informed of applicable rights of appeal to IPEC.
7. Monitor customer outcomes throughout the product lifecycle.
8. Allocate appropriate resources to address material customer fairness risks.
9. Investigate significant conduct concerns.
10. Implement and monitor corrective action plans.

## 18. RESPONSIBILITIES OF BUSINESS UNITS

18.1 Underwriting

Underwriting shall:

- Apply approved underwriting guidelines consistently.
- Ensure appropriate classification of risks.
- Avoid unfair or misleading premium practices.
- Clearly communicate material underwriting conditions.

- Maintain accurate policy information.

### 18.2 Sales and Marketing

Sales and Marketing shall:

- Promote products accurately.
- Avoid misleading representations.
- Clearly disclose material limitations.
- Ensure that marketing material is appropriate for the target market.
- Ensure that sales personnel are appropriately trained.

### 18.3 Claims

Claims shall:

- Handle claims fairly and consistently.
- Avoid unjustified delays.
- Communicate meaningfully with claimants.
- Document significant decisions.
- Provide appropriate reasons for repudiations.
- Identify systemic causes of claims complaints.

### 18.4 Compliance and Risk

Compliance and Risk shall:

- Monitor implementation of the TCF framework.
- Conduct periodic assessments.
- Identify conduct risks.
- Report material concerns to Management and the Board.
- Monitor corrective actions.

### 18.5 Finance and Collections

Finance and Collections shall ensure that:

- Premium-related communications are clear;
- Payment arrangements are administered fairly;
- Refunds are processed in accordance with applicable policy and contractual requirements; and
- Financial processes do not create unreasonable customer barriers.

### 18.6 Customer Service

Customer Service shall:

- Provide clear and accurate information;
- Record and escalate customer complaints and queries;
- Avoid misleading customers;
- Maintain appropriate records of significant customer interactions; and
- Escalate potential customer detriment.

## 19. THIRD-PARTY SERVICE PROVIDERS

Champions Insurance remains accountable for customer outcomes where services are performed by third parties on its behalf.

Third parties may include:

- Agents;
- Brokers and intermediaries;
- Assessors;
- Repairers;
- Loss adjusters;
- Service providers; and
- Other outsourced providers.

The Company shall implement appropriate oversight through:

- Due diligence;
- Contractual requirements;
- Service level agreements;
- Training;
- Performance monitoring;
- Complaint monitoring; and
- Escalation procedures.

*Where a service provider's conduct results in potential unfair treatment, the Company shall investigate and implement appropriate corrective action.*

## 20. CUSTOMER VULNERABILITY

Champions Insurance shall take reasonable steps to identify circumstances in which a customer may require additional support to understand or access an insurance product or service.

Appropriate support may include:

- Providing clearer explanations;
- Allowing reasonable time for decision-making;
- Using suitable communication channels;
- Providing additional assistance in understanding requirements; and
- Taking reasonable steps to prevent exploitation.

The purpose of such support is to promote fair treatment and informed decision-making.

## 21. TCF MANAGEMENT INFORMATION

The Company shall develop and maintain management information capable of assisting Management and the Board to assess whether customers are being treated fairly.

Relevant information may include:

- Number of complaints received;
- Nature and causes of complaints;
- Complaint resolution times;
- Unresolved complaints;
- Claims turnaround times;
- Outstanding claims;
- Claims repudiation rates;
- Claims reopened after complaint or appeal;
- Customer feedback;
- Product cancellations;
- Sales conduct incidents;
- Errors in policy documentation;
- Training completion rates;
- Service provider complaints;
- Root cause analysis; and
- Progress on corrective actions.

*The information shall be sufficiently detailed to identify trends and potential customer detriment.*

## 22. QUARTERLY COMPLAINTS TYPOLOGY REPORTING

Champions Insurance shall maintain sufficient information regarding complaints to enable the Company to comply with applicable quarterly complaints reporting requirements.

The complaints typology shall, where required, identify:

- Types of complaints;
- Products affected;
- Causes of complaints;
- Outcomes;
- Trends;
- Number of valid complaints;
- Corrective actions; and
- Recurring conduct concerns.

*The Company shall ensure that the required information is submitted to IPEC as part of applicable quarterly returns.*

## 23. TCF RISK ASSESSMENT

The Company shall identify, assess and monitor conduct risks that may result in unfair customer outcomes.

Examples include:

- Mis-selling;
- Misleading marketing;
- Inadequate disclosure;
- Unsuitable advice;
- Incorrect policy issuance;
- Unreasonable claims delays;
- Unfair claims repudiation;
- Poor complaint handling;
- Inappropriate staff incentives;
- Unqualified or inadequately trained sales personnel;
- Poor service provider conduct; and
- Systems or processes that create unreasonable post-sale barriers.

## 24. TRAINING AND AWARENESS

All relevant employees shall receive TCF training appropriate to their role.

Training shall cover:

- The principles of TCF;
- The six TCF outcomes;
- Customer fairness responsibilities;
- Clear customer communication;
- Product knowledge;
- Suitable advice;
- Fair claims handling;
- Complaint management;
- Identification of customer detriment; and
- Escalation of conduct concerns.

*The Company shall maintain appropriate training records and provide refresher training where necessary.*

## 25. MONITORING, TESTING AND ASSURANCE

TCF implementation shall be subject to periodic monitoring and testing.

This may include:

- Compliance reviews;
- File reviews;
- Claims audits;
- Complaint reviews;
- Customer communication reviews;
- Product reviews;
- Sales monitoring;
- Customer feedback analysis; and
- Internal audit reviews.

*The purpose of monitoring shall be to determine whether the Company is achieving fair customer outcomes in practice and not merely maintaining documented policies.*

## 26. BREACHES, INCIDENTS AND ESCALATION

Employees shall promptly escalate actual or suspected conduct that may result in unfair treatment of customers.

Matters requiring escalation may include:

- Deliberate misrepresentation;
- Systemic claims delays;
- Unfair repudiation practices;
- Mis-selling;
- Failure to disclose material information;
- Repeated customer complaints concerning the same issue;
- Material service provider failures; or
- Any practice likely to cause significant customer detriment.

*Material matters shall be investigated and reported to the appropriate level of Management and, where necessary, the Board.*

## 27. CUSTOMER REMEDIATION AND CORRECTIVE ACTION

Where unfair customer treatment or a systemic failure is identified, Champions Insurance shall consider whether affected customers require remediation.

Corrective action may include:

- Reconsideration of a decision;
- Correction of customer records;
- Payment of an amount properly due;
- Review of affected policies or claims;
- Improvement of communication;
- Product amendments;
- Staff training;
- Process redesign;
- Disciplinary action; or
- Enhanced service provider oversight.

Corrective action plans shall identify:

- The issue;
- Root cause;
- Responsible owner;
- Required action;
- Target completion date; and
- Monitoring arrangements.

## 28. ENFORCEMENT AND COMPLIANCE

Champions Insurance acknowledges that IPEC may monitor and test the culture, strategies and behaviour of insurance service providers in relation to the treatment of customers.

Failure to comply with the applicable TCF Framework may result in regulatory action in terms of the relevant legislation and regulations.

The Company shall therefore maintain sufficient evidence to demonstrate implementation of this Manual and the applicable regulatory requirements.

The Board and Management shall take particular note of regulatory provisions relating to:

- Regulatory monitoring and investigations;
- Publication of entities with significant numbers of valid complaints;
- Quarterly complaints typology reporting; and
- Regulatory action where complaints and customer conduct concerns reach significant levels.

## 29. RECORD KEEPING

The Company shall maintain appropriate records demonstrating the implementation of TCF principles.

Such records may include:

- Board and Management reports;
- TCF policies and procedures;
- Product approval documents;
- Product reviews;
- Marketing approvals;
- Customer communications;
- Training records;
- Complaints registers;
- Complaints investigation records;
- Claims files;
- TCF monitoring reports;
- Risk assessments;
- Internal audit reports; and
- Corrective action plans.

*Records shall be retained in accordance with applicable legal, regulatory and internal record-retention requirements.*

## 30. KEY TCF PERFORMANCE INDICATORS

The Company may monitor the following indicators:

| Area | Illustrative Indicator |
|---|---|
| Complaints | Number and nature of complaints |
| Complaints | Average resolution time |
| Complaints | Number of unresolved complaints |
| Claims | Claims turnaround time |
| Claims | Aged outstanding claims |
| Claims | Repudiation and appeal trends |
| Sales | Sales conduct incidents |
| Products | Product-related complaints |
| Communication | Errors and customer communication failures |
| Training | TCF training completion |
| Service Providers | Service-related complaints and turnaround times |
| Customer Feedback | Customer satisfaction and recurring concerns |
| Corrective Action | Closure of agreed remediation actions |

*These indicators shall be reviewed and refined based on the Company's risk profile and regulatory requirements.*

## 31. REVIEW OF THE MANUAL

This Manual shall be reviewed at least annually and earlier where:

- IPEC issues new or amended requirements;
- Applicable legislation changes;
- There is a material change in the Company's business or operating model;
- Significant customer detriment is identified;
- Internal Audit or Compliance identifies material weaknesses; or
- The Board or Management considers a review necessary.

*Any material amendments shall be submitted through the appropriate governance process for approval.*

## 32. DECLARATION AND COMMITMENT

Champions Insurance is committed to ensuring that customers are treated fairly throughout their relationship with the Company.

The Company recognises that TCF is a Board and Management responsibility and that its successful implementation requires the active participation of every employee and relevant third party.

The fair treatment of customers shall therefore be embedded in the Company's culture, strategy, products, processes and decision-making.

Every employee and person acting on behalf of Champions Insurance is expected to uphold the following commitment:

We will place fair customer outcomes at the centre of our conduct and decision-making, provide clear and appropriate information, offer suitable products and services, handle claims and complaints fairly, and avoid unreasonable barriers that may prevent customers from exercising their rights.