

LIBERTY GROUP POLICY

National Credit Act Language Policy

Level Liberty Group
Policy owner Compliance Officer: Liberty Life
Approved by Group Risk Committee
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Table of Contents

1	Purpose	3
2	Scope	3
3	Policy Statement	4
4	Application and Implementation	4
4.1	Language Policy for Written Communication	4
4.2	Language Policy for the Liberty Group Call Centres	4
4.3	Language Policy for the Liberty Group Staff	4
5	Roles and Responsibilities	4
5.1	Liberty Group Governance Structures	4
5.1.1	Board of Directors (or appropriate sub-committee of the board)	4
5.2	Liberty Group Executive Management	5
5.2.1	Liberty Group Executive Committee	5
5.2.2	Chief Executive Officer (CEO)	5
5.2.3	Compliance Officer: Liberty Life	5
5.3	Liberty Group Business Unit Management.....	5
5.3.1	Business Unit (BU) Heads	5
5.3.2	Policyholder Communications.....	5
5.3.3	Call Centre/s.....	5
5.3.4	Commissions.....	6
5.3.5	Liberty Group HR	6
5.4	Group Compliance.....	6
5.5	Group Internal Audit Services (GIAS)	6
6	Compliance and Reporting	6
7	Related Information	6
8	Policy Administration	6

1 Purpose

The National Credit Act (NCA) stipulates that consumers have the right to receive documents relating to matters covered in the Act in an official language that the consumer reads or understands. In giving effect to this right, Liberty Group's language policy must be reasonable having regard to usage, practicality, expense, regional circumstances and the balance of the needs and preferences of the population ordinarily served by the Liberty Group.

In addition, these documents must be in plain and understandable language, defined as follows:

"A document is in plain language if it is reasonable to conclude that an ordinary consumer of the class of persons for whom the document is intended, with average literacy skills and minimal credit experience, could be expected to understand the content, significance and import of the document without undue effort, having regard to:

- the context, comprehensiveness and consistency of the document
- the organisation, form and style of the document
- the vocabulary, usage and sentence structure of the text
- the use of any illustrations, examples, headings, or other aids to reading and understanding."

The way in which the Liberty Group will comply with these requirements is set out in this policy.

2 Scope

All business units in the Liberty Group must comply with this policy. Non-compliance with this policy will be referred to the Compliance Officer: Liberty Life.

This policy applies to all documentation relating to:

- Interest bearing policy loans to clients;
- Loans to intermediaries; and
- Loans to staff members.

Official languages referred to in this policy are South African official languages i.e.: Afrikaans, English, isiNdebele, isiXhosa, isiZulu, Sesotho sa Leboa, Sesotho, Setswana, siSwati, Tshivenda and Xitsonga.

3 Policy Statement

The Liberty Group will use plain and understandable language in written communication to stakeholders about issues addressed in the NCA.

The Liberty Group will arrange for certain NCA documentation, as outlined in the Appendix, to be readily available in both isiZulu and Sesotho. Clients will have an option to request this documentation in either of the languages.

The Liberty Group will ensure that its call centres are adequately staffed to allow for client support in all of the eleven official languages.

4 Application and Implementation

4.1 Language Policy for Written Communication

Policyholders, Staff members and Intermediaries will have an option to have certain NCA related documentation available in isiZulu and Sesotho. This option will be communicated accordingly and this documentation will be readily available on request.

Liberty Policyholder Communications will maintain a register and repository of translated documents for use in the future.

4.2 Language Policy for the Liberty Group Call Centres

The Liberty Group will ensure that its call centres are sufficiently staffed and these staff members will be adequately trained to allow for clients to discuss NCA-related queries with the agents in the official language of the client's choice and provide assistance with the written NCA documentation.

The call centres shall maintain an up-to-date register of the language(s) in which each call centre agent can converse with clients.

4.3 Language Policy for the Liberty Group Staff

Liberty Group staff members will have an option to have the written terms and conditions of a loan available on request in isiZulu or Sesotho. HR will advise staff members of this option when staff apply for a loan that is regulated by the NCA.

5 Roles and Responsibilities

The roles and responsibilities of the Liberty Group staff in relation to this policy are as follows:

5.1 Liberty Group Governance Structures

5.1.1 Board of Directors (or appropriate sub-committee of the board)

Reviews reports on material non-compliance with this policy.

5.2 Liberty Group Executive Management

5.2.1 Liberty Group Executive Committee

- Approves this policy.
- Reviews reports on non-compliance with this policy and ensures that appropriate plans for corrective action are put in place.

5.2.2 Chief Executive Officer (CEO)

- Ensures that this policy is implemented throughout the Liberty Group.
- Delegates the authority for such implementation to executive management.

5.2.3 Compliance Officer: Liberty Life

- Owns and monitors compliances with this policy.
- Ensures the requirements of this policy are adequately communicated to all business units.
- Reviews this policy annually to ensure ongoing compliance to the provisions of the National Credit Act.

5.3 Liberty Group Business Unit Management

5.3.1 Business Unit (BU) Heads

- Ensure compliance with this policy and related procedures throughout areas of accountability.
- Ensure staff members are adequately trained to meet the requirements of this policy.
- Ensure adequate measures are taken to address non-compliance.

5.3.2 Policyholder Communications

- Prepare and approve NCA-related documentation for policyholders in accordance with this policy.
- Ensure that all NCA-related documentation is translated into isiZulu and Sesotho and readily available on request.
- Advise policyholders of the option to have certain NCA documentation readily available in either isiZulu or Sesotho.
- Advise policyholders of the option to receive advice, as defined in this policy, in one of the eleven official languages.
- Refer policyholders to call centre agents who are able to answer NCA questions in the preferred official language
- Train and educate staff members who have direct contact with clients on the principles of plain language and contents of this policy.
- Maintain a register of and repository for translated documents.

5.3.3 Call Centre/s

- Train and educate staff members who have direct contact with clients on the principles of plain language and contents of this policy.
- Maintain an up-to-date register of the language(s) in which each call centre agent can converse with clients.

5.3.4 Commissions

- Advise intermediaries of the option to have certain NCA documentation readily available in either isiZulu or Sesotho.
- Advise intermediaries of the option to receive advice, as defined in this policy, in one of the eleven official languages.
- Refer intermediaries to call centre agents who are able to answer NCA questions in the preferred official language

5.3.5 Liberty Group HR

- Advise staff members of the option to have certain NCA documentation readily available in either isiZulu or Sesotho.
- Advise staff members of the option to receive advice, as defined in this policy, in one of the eleven official languages.
- Refer staff members to call centre agents who are able to answer NCA questions in the preferred official language.

5.4 Group Compliance

- Assists the BU heads in implementing this policy in each BU.
- Monitors and reports on compliance with this policy to the BU heads.

5.5 Group Internal Audit Services (GIAS)

Reviews compliance with this policy and reports results of this review to the Board.

6 Compliance and Reporting

Compliance with this policy is mandatory for all Liberty Group staff. Non-compliance with this policy will be reported to the Compliance Officer: Liberty Life.

7 Related Information

- National Credit Act (NCA)
- Liberty Standard Terminology Guideline (developed by Policyholder Communications)
- Liberty Plain Language Guidelines (developed by Policyholder Communications)
- Liberty Communication Standards (developed by Policyholder Communications)

8 Policy Administration

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Version information

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National Credit Act Language Policy	2	21 February 2008

Review

Frequency of review	Date of next review	Date of last review
Annually OR with changing circumstances	1 year after approval date	31 August 2009