



CUSTOMER PROTECTION AND COMPLAINT MANAGEMENT POLICY FOR JAIZ BANK PLC.

Version 2.0 APPROVED BY THE BOARD OF DIRECTORS ON MAY 27, 2020

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1.0 INTRODUCTION

This policy is intended to define the key principles and rules for effective and efficient complaint management in compliance with applicable regulatory requirements and best practices.

The policy would therefore provide guidance to staff on how complaints will be managed from end to end (receipt to resolution) and also includes the responsibilities of all involved.

The Customer Complaint Policy is supported by an automated Customer Complaint Management System (CCMS).

Similarly, Customer Service Desks manned by appropriate officers have been created across the Bank including the Head Office to assist with customer complaint resolution and ensure that complaints are resolved to the satisfaction of the customer.

Within the meaning of this policy, a complaint is any statement of dissatisfaction made by a present, former, or prospective customer of the Bank (hereinafter referred to as ‘the customer’) in connection with the provision of a particular banking or financial services.

2.0 OBJECTIVE

This policy is designed to provide guidance to staff on the manner in which customer complaints are received and managed. The Bank is committed to being responsive to the needs and concerns of customers and to resolving complaints within the stipulated turn-around time. Furthermore, we are committed to being consistent, fair and impartial when handling complaints.

The objectives of this policy are:

- To create awareness on the Bank’s complaint handling process.
- To ensure that all staff understand the complaints handling process.
- To ensure that all complaints are investigated impartially and with a balanced view of all information or evidence.
- To ensure that complaints are considered on their merits taking into account individual circumstances and needs.
- To ensure that all staff recognize customers’ right to provide feedback and complain about product and services rendered.
- To ensure that all complaints are treated in line with laid down statutory and regulatory requirements.
- To utilize the information generated to improve the quality of products, services, staff training and complaint handling procedures.

3.0 SCOPE

This policy shall be applicable to all employees of Jaiz Bank that are engaged in managing complaints made to or about the Bank, regarding the products, services, and staff.

4.0 POLICIES AND PROCEDURES

4.1 How a complaint can be Made

Any customer that is dissatisfied with any of the Bank's product or service, may consider speaking directly with the staff member/s attending to them. If the said staff member is unable to address the customer's complaint the staff should refer the customer to the Customer Service desk/Branch Service Manager in their branch. Where the customer is dissatisfied with the solution provided by the Customer Service desk, the customer should be advised to lodge a complaint with the Bank through one of the following channels:

- a) By completing the Online Complaints form on the website "www.jaizbankplc.com"
- b) By calling the Contact Center on 07080635500 or 07080635555
- c) By emailing the Bank via customercare@jaizbankplc.com
- d) By chatting with the Bank's designated officers via the website @ www.jaizbankplc.com
- e) By writing directly to the Bank via the following address: Jaiz bank plc, CBD P.M.B 31, Abuja Nigeria.
- f) By filling a Complaint Form at the Customer Service desk at the branches and/or dropping written complaints/suggestions in the branches' Complaint Box, details of which would be logged on the CCIT portal.
- g) The Bank's Social Media handles through which customers may further engage the Bank include the following and any other new social media innovation suited for the purpose as may unveil:
 - i. Facebook: <https://www.facebook.com/jaizbankplc>
 - ii. Twitter: @jaizbankplc
 - iii. Instagram: jaizbankplc
 - iv. Whatsapp

4.2 Information Required to Make a Complaint

- Customer's name and contact details

- Nature of customer's relationship with Jaiz Bank
- Name/description of product or service being complained about
- Detailed explanation of complaint type
- Remedy requested/complainant's prayer
- Copies of any documentation supporting the complaint.

4.3 Assistance with Making a Complaint

The staff attending to the complainant should provide the customer with any assistance he/she may require to resolve the complaint. The Customer Helpdesk/Customer Service Officers/Branch Service Managers (BSMs) MUST ensure that complaints received are logged into the Customer Complaint Portal/SMS which in turn will generate a unique identifier code that is sent to the customer within 24 hours of receipt. (Penalties shall apply to the staff who received the complaint but failed to log it as appropriate.) The customer shall then be contacted immediately to acknowledge receipt of the complaint via SMS or e-mail notification. The notification will contain the Unique Identifier Code as well as the status of the complaint.

4.4 Assessment and Investigation

Upon receipt of complaints, security checks shall be carried out for customer's authentication and each complaint would be initially verified and assessed for severity and possibility of immediate action and will be treated accordingly by the Customer Service Officer/BSM. Where necessary, complaints shall be investigated and the level of investigation would be commensurate with the seriousness/frequency of occurrence and severity of the complaint.

4.5 Feedback

Complaints will be tracked from end to end i.e. from initial receipt through the entire process until the complaint is resolved and closed. An up-to-date status would be made available to the complainant upon request and at regular intervals, via any of our channels. On satisfactory resolution of a complaint, the Customer Helpdesk/BSM shall provide a comprehensive resolution detail which would include the root cause of the complaint to back up the decision taken and thereafter close the case. The Customer Helpdesk/BSM shall immediately notify the customer on resolution of the complaint.

4.6 Closing the Complaint

If the complainant accepts the proposed decision or action, then the decision or action would be carried out and recorded. If the complainant rejects the proposed decision or action, then the complaint would remain open. This would be recorded and escalated to the Chief Complaint Officer of the Bank (the Bank's Ombudsman). The complainant would be informed of alternative forms of internal and external recourse available. The organization would continue to monitor the progress of the complaint until all reasonable internal and external options of recourse are exhausted or the complainant is satisfied.

5.0 ESCALATION PATHS

The Bank aims to resolve complaints at the first level - the frontline, where relevant staff will be adequately equipped to respond to complaints, including being given appropriate authority, training and supervision.

Where this is not possible, the complaint shall be escalated to the Chief Complaint Officer or any other officer so designated by the Bank who might explore alternative dispute resolution options. This second level of complaint handling would involve among others an assessment of the complaint and decision/s already made, and/or further investigation into the issues where necessary. The Chief Complaint Officer shall make a ruling within the shortest possible time after the complaint has been received. Feedback on decisions taken shall be forwarded to the customer and appropriate officer at the concerned branch to enable them close the matter on the portal.

Where the Complainant is dissatisfied with the outcome of the Bank's ombudsman's decision, they would be advised of the external review options available to them, including the Consumer Protection Council, and the Consumer Protection Department of the Central Bank of Nigeria (CBN) at the following addresses:

1. The Consumer Protection Department (CPD) - cpd@cbn.gov.ng
Central Bank of Nigeria (CBN)
Plot 33, Abubakar Tafawa Balewa Way
Central Business District - Cadastral Zone,
P.M.B. 0187,
Garki Abuja - Nigeria.
2. The Consumer Protection Council (CPC) - contact@cpc.gov.ng
Plot 1105 Dar-es-Salaam Street
Off Aminu Kano Crescent Wuse II, Abuja.

6.0 COMPLAINANT'S RIGHTS IN COMPLAINT HANDLING PROCESS

The complainant has the right to:

- Be heard.
- Be attended to with courtesy and empathy.
- Know whether the Bank's relevant product and service guidelines have been adhered to.
- Provide and request all relevant material to support the complaint where this does not breach privacy regulations.
- Be informed of the response to their complaint.
- Be informed of the Bank's decision and the reason for this decision.
- Know that their complaint is being reviewed independently where appropriate.
- Make further complaint or escalate to internal or external parties should they consider that their complaints are not being adequately handled or should they be dissatisfied with resolution provided by the Bank.

7.0 ORGANIZATIONAL COMMITMENT

7.1 Commitment to Effective Complaint Handling Process / Mechanism

The Bank is committed to service excellence. We are therefore eager to seek/receive feedbacks about the Bank's services, systems, practices, procedures, products, and the efficacy of the complaint handling mechanisms.

We promise to:

- Take reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.
- Do our best to investigate anonymous complaints on their merits.
- Publicize information about how and where complaints may be made to or about us as well as ensure that systems are put in place to make the information easily understood and accessible to everyone.
- Ensure that customers are not charged for lodging complaints.
- Ensure that where possible, complaints are resolved at the first contact with the bank.
- Ensure that received complaints are promptly acknowledged.

- Ensure that each complaint is addressed with integrity and in an equitable, objective and unbiased manner.
- Ensure that conflict of interests, whether actual or perceived, are managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.
- Ensure that the identity of the complainant shall be protected where appropriate or practicable.
- Ensure that personal information that identifies individuals will only be disclosed or used by the Bank as permitted under the relevant laws and any relevant confidentiality obligations.
- Ensure that where a complaint involves multiple organizations, the Bank will work with the other organization(s) where possible, to ensure that communication with the Complainant and/or their representative is clear and coordinated.
- Ensure that all staff managing complaints are empowered to implement the complaint management system as relevant to their roles and responsibilities.
- Encourage Staff to provide feedback on the effectiveness and efficiency of all aspects of the complaint management system to enable the Bank consistently monitor and improve same.

7.2 Commitment to Fair Treatment of Customers

In order to promote and enhance the policy of fair treatment, the Bank hereby promise to:

- Ensure that all customers are given equitable treatment without bias at all stages of the relationship.
- Ensure that all customers are given equal access to basic services without regard to their social status, physical ability, marital status, gender, age, religion, tribe or ideology subject to meeting the minimum legal and non – discriminatory eligibility requirements.
- Ensure that all customers are financially included especially the vulnerable groups such as low-income consumers, women, seniors, physically challenged and the non-literate in the development and implementation of their business models, strategies and processes.
- Ensure that all customers treated with courtesy and respect and we shall not engage in practices such as threats, intimidation, use of abusive or offensive language, humiliation, misrepresentation, deception or unfair inducements.

7.3 Commitment to Disclosure and Transparency

In order to promote transparency and enhance disclosure practices, the Bank hereby promise to:

- Ensure that documents provided to customers are written in clear, legible and simple english language and in a minimum font size of 10; provided in a durable form for future reference; contains the name, contact details of the Bank and the customer; contains a statement that the Institution is regulated by the Central Bank of Nigeria; and the content of the document is not be misleading or deceptive.
- Ensure that staff shall provide an oral explanation of the document to the customer in a language that he or she understands if the customer requests and / or it is reasonably obvious that the customer is illiterate or visually impaired or, for any other reason, cannot understand the document.
- Conspicuously displaying in the banking halls and publishing on the Bank's website and internet banking platforms, accurate and up to date information on all our products and services. Such information shall include; exchange rates of foreign currencies, facility profit rates and investment profit rates. Customers shall always be advised to check the rates before consummating foreign exchange transactions and other contractual agreements.
- Disclose to the customer in writing, all Terms and Conditions of a transaction agreement. The disclaimer "Terms and Conditions Apply" or any other phrase conveying a similar meaning shall only be used if the terms and conditions have been explained and disclosed in the contract or in other medium made accessible by the customer. The Bank shall at all times, draw the customer's attention to such disclosure
- Clearly explain technical terms used in documents to the customer to aid understanding
- Ensuring that the Customers state their preferred communication channel(s) to be used for all correspondences and include the channel(s) in all contract documents.
- Ensuring that the Bank's websites and other information dissemination channels are functional and regularly updated with the current features of products and services offered.
- Complying with the rates, fees, charges, or prices published or disclosed at the engagement points.
- Always bear all costs associated with disclosures to customers required by the Regulations, except for deposits and withdrawals by or on behalf of the customers.

7.4 Commitment to promoting good business practices:

In other to promote good business practices, the Bank is committed to:

- Conducting its business in a responsible, professional and ethical manner.
- Training its staff to promote competence, efficiency and professionalism in the discharge of their duties.
- Providing clear information about products and services, features, terms and conditions and the applicable fees and charges.
- Providing and informing consumers of the channels to make enquiries and complaints.
- Notifying customers of circumstances or situations that may affect the terms of their contracts or relationships with the Bank.
- Not imposing any product, service or channel on consumers.
- Not charging fees for issuance and renewal of products or services which have not been requested by the customer.

Not compelling consumers to buy a product or service as a condition for the purchase of another product or service unless where the products or services are directly dependent.

The following table outlines the nature of the commitment expected from staff and the way that commitment should be implemented.

WHO	COMMITMENT	HOW
Executive Management	Promote a culture that encourages Consumer Financial Education and values complaints and its effective resolution	<ul style="list-style-type: none"> • Consumer Education Strategies shall be in place to enhance financial knowledge of customers in form of customer sensitization programs which shall be achieved through, but not limited to: <ul style="list-style-type: none"> ✓ Customer Segmentation. ✓ Content development to suit each segment. ✓ Consultation and collaboration with relevant stakeholders as a platform for exchange of ideas. ✓ Monitoring and evaluation of the impact of each sensitization campaign. • Report publicly on Jaiz Bank’s complaint handling • Provide adequate support and direction to key staff responsible for handling complaints • Regularly review reports about complaint trends and issues arising from complaints. • Encourage all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly. • Encourage staff to make recommendations for service improvements.

		<ul style="list-style-type: none"> • Recognize and reward good complaint handling by staff. • Provide recommendations for product (where relevant), service, staff and complaint handling improvements arising from the analysis of complaint data.
Head Customer Service	Establish and manage the complaint management system	<ul style="list-style-type: none"> • Provide monthly reports to the Executive Management Committee on issues arising from complaint handling which would also be used in formulation of customer sensitization strategies and campaigns. • Ensure recommendations arising out of complaint data analysis are canvassed with the Chief Complaint Officer where necessary before implementation where appropriate. • Train and empower staff to resolve complaints promptly and in accordance with the Bank's policies and procedures. • Encourage staff managing complaints to provide suggestions on ways to improve the organization's complaint management system. • Encourage all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly. • Collate and analyze data. • Recognize and reward good complaint handling by staff.
Customer Service Staff	Demonstrate exemplary complaint handling practices	<ul style="list-style-type: none"> • Treat all customers/staff with respect, including people who make complaints. • Treat every complaint as a learning point and apply same resolution process for reoccurring situations. • Assist people make a complaint, if needed. • Comply with this policy and its associated procedures. • Keep informed about industry best practice in complaint handling and have the relevant knowledge to educate and sensitize customers through all interactions. • Capture and report data on CCMS (Customer Complaint Management System) • Provide feedback to supervisor on issues arising from complaints. • Provide suggestions on ways to improve the Bank's complaints management system.

		<ul style="list-style-type: none"> • Implement changes arising from individual complaints and from the analysis of the complaint data as directed by management. • Comply with the specified timeline (based on the SLA of that unit) in treating complaints. • Complaints not resolved within stipulated timeline should be duly escalated based on the SLA • Complaints with immediate resolution shall be communicated to the customer same day of receipt and logged as resolved on the CCMS.
Customer Help Desk	Handle all categories of Customer Complaints	<ul style="list-style-type: none"> • Be fully empowered with the knowledge to educate and sensitize customers on enquiries received and based on periodic sensitization campaigns. • Have dedicated email addresses through which Complaints may be lodged • Complaints should be resolved within 14 days. • The following escalation paths shall be adhered to: <ul style="list-style-type: none"> ✓ First level complaint resolution shall be handled by the Customer Service Officers/Contact Centre Agents immediately ✓ Escalation shall be made to the appropriate desks for 2nd level complaint resolution same day the complaint is made ✓ If the complaint is not resolved after the stipulated Turn around Time (TAT) for the complaint type or 3 working days from the date of complaint, the issue shall be escalated to the Head, Customer Service and Head of Operations. ✓ In a situation where the issue remains unresolved after 5 working days from date of complaint, the issue shall be escalated to the Chief Complaint Officer ✓ If the issue still remains un-resolved after 8 working days from the date of complaint, the issue shall be escalated to the Executive Management for a final decision to be taken. • File periodic customer complaint resolution report to the CBN.
All Staff	Understand and comply with the Bank's complaint handling practices	<ul style="list-style-type: none"> • Treat all customers with respect, including people who make complaints

		<ul style="list-style-type: none"> • Be aware of the Bank’s complaint handling policies and procedures. • Assist people who wish to make complaints access the Bank’s complaints process. • Be alert to complaints and assist staff handling complaints resolve matters promptly. • Provide feedback to management on issues arising from complaints. • Implement changes arising from individual complaints and from the analysis and evaluation of complaint data as directed by management. • <u>Be fully empowered with the knowledge to educate and sensitize customers on enquiries received and based on periodic sensitization campaigns.</u>
Chief Complaint Officer	Serve as the Bank’s Ombudsman	<ul style="list-style-type: none"> • Receive, review, and make rulings on unresolved customer complaints within the shortest possible time after receiving them. • Forward feedbacks on decisions taken to the Customer and relevant Customer Helpdesk for closure. • <u>Monitor and evaluate of the impact of each sensitization campaign.</u>

8.0 ANALYSIS AND EVALUATION OF COMPLAINTS

Complaints shall be recorded in a systematic manner, such that information can be easily retrieved for reporting and analysis. A report shall have the following key information available:

- The number of complaints received
- The outcome of complaints, including matters resolved at the frontline
- Issues arising from complaints
- Systemic issues identified, and
- The number of requests received for internal and /or external review of the Bank’s complaint handling.

Regular analysis of these reports shall be undertaken to monitor trends, measure the quality of service delivery and make improvements.

Monthly reports and their analysis shall be provided to the Bank’s Executive Management Committee for review.

The Bank shall similarly submit monthly returns on all customer complaints received (whether closed or not) to the relevant Department at the Central Bank of Nigeria (CBN) in the approved template. The report shall contain the details of complaints received during the period, number resolved and number not resolved (pending issues) for the period under review.

This policy shall be reviewed every 3 years.