



Grievance Policy

Table of Contents

| | | |
|------------|--|----------|
| 1. | <i>Introduction</i> | 4 |
| 2. | <i>Purpose</i> | 4 |
| 3. | <i>Scope</i> | 4 |
| 4. | <i>Communication and Awareness</i> | 4 |
| 5. | <i>Grievance Management Procedures</i> | 5 |
| 6. | <i>Guidelines for grievance meeting</i> | 6 |
| 7. | <i>Decision-Making on Grievance</i> | 7 |
| 8. | <i>Appeals Procedure</i> | 7 |
| 9. | <i>Closing of Case</i> | 8 |
| 10. | <i>Review and Revision</i> | 8 |
| 11. | <i>Compliance</i> | 8 |
| 12. | <i>Conclusion</i> | 8 |

1. Introduction

AB Microfinance Bank Nigeria Limited believe that efficient and productive employees are fundamental to the Banks productivity, efficiency and success and so essentially, we endeavor to maintain a working environment that fosters mutual respect and accountability; ABN's HR policies and procedures is continually designed to satisfy or exceed the minimum standards prescribed in the Nigerian Labor Law, we make efforts to take into consideration employee needs in business and management decisions as well as provide an atmosphere whereby open communication, cordial and professional relationship is maintained.

We are aware that complaints may arise in the workplace and many of such complaints should be resolved fairly and promptly, through informal discussion but in the case where it is not, then a more formal approach should be considered and this internal grievance procedures should provide guidance through which any case or incidence shall be reported for appropriate redress and ultimately a dispute resolution in the best mutual interest of all concerned.

2. Purpose

The Grievance Policy outlines the procedures for addressing concerns, complaints, or grievances raised by employees and stakeholders. This policy ensures that all grievances are handled promptly, fairly, and confidentially to maintain a positive working environment. It is the policy of AB Microfinance Bank Nigeria Limited that employees should:

- Raise Issues, without any fear of retribution or rebuttal.
- Be given a fair hearing by their immediate supervisor or manager concerning any grievances they may wish to raise.
- Have the right to appeal to a more senior manager against a decision made by their supervisor or manager.

This grievance Policy are not disciplinary procedures since the main objective is not penalization, but achievement of a win-win situation resolving a dispute in a permanent manner, however, if the case at hand is considered severe, a gross misconduct bordering on weighty matters e.g., discrimination, harassment, breach of the Bank's code of conduct and policies then a disciplinary process will be initiated accordingly.

3. Scope

This policy applies to all employees, contractors, vendors, clients, and any other stakeholders associated with AB Microfinance Bank Nigeria Limited.

4. Communication and Awareness

a. Communication to Staff and Stakeholders:

- This Grievance Policy will be communicated to all employees and stakeholders through multiple channels in the Bank to ensure awareness of its existence and importance.
- An announcement email will be sent to all staff members and stakeholders, introducing the Grievance Policy and its significance in promoting a healthy workplace culture.
- The policy will be prominently displayed on ABN's website, intranet/internal document share drives or any other internal communication platforms accessible to all employees and stakeholders.
- During employee orientation sessions, new hires will receive a detailed briefing on the Grievance Policy, emphasizing its role in resolving workplace issues.
- Regular training sessions or workshops will be conducted to educate employees and stakeholders about the policy's procedures and encourage them to seek redress through the established grievance management system.

b. Encouragement to Seek Redress:

- All employees and stakeholders will be encouraged to seek redress through the established grievance management procedures outlined in this policy.
- Managers and supervisors will actively promote an open-door policy, welcoming employees to discuss any concerns or grievances they may have.
- Anonymous suggestion boxes or feedback mechanisms will be available to provide an alternative avenue for raising grievances, ensuring confidentiality and impartiality.

5. Grievance Management Procedures

- Any employee or stakeholder who has a concern or grievance should first attempt to resolve it informally by discussing it with their immediate supervisor or manager.
- If the concern remains unresolved or if the employee is uncomfortable discussing it with their supervisor, they may submit a formal written grievance to the Human Resources (HR) Department.
- The HR Department will promptly acknowledge receipt of the grievance and initiate an investigation within 24 hours of receipt. The investigation will be conducted impartially and confidentially. Investigation should not exceed 10 working days.
- Upon completion of the investigation, HR will communicate the findings to the relevant parties involved in person meeting and writing and propose appropriate solutions or actions to resolve the grievance.

- If the grievance involves a conflict of interest or concerns about HR, employees or stakeholders may escalate the matter to the appropriate higher-level authority or Senior Management Team.
- All grievances will be handled with sensitivity, confidentiality, and fairness. All breach of confidentiality or retaliation against any individual for filing a grievance is strictly prohibited and will result in disciplinary action.
- Other conditions for higher level reporting
 - In the scenario where the Manager or HOD is the person whose work or behaviors is the subject of grievance, then the grievance should be directly submitted to the Head of Human Resources Department, or via the Bank's whistleblowing channel (whistle-blowing@ab-mfbnigeria.com); For the sake of transparency and fairness, anonymous grievances may only be excused on cases of discrimination and abuse at work, threats, harassment especially where strong facts are presented.
 - And in the case where the grievance is filed personally in trust/confidence, then the identity of the complainant is known only to the person in charge of receiving it. Review of grievance at this level should not exceed 14 working days of receiving the grievance.
 - Further to this, depending on the grievance subject matter and the related circumstances e.g., criminal offences, it can be referred to a higher internal decision-making level (e.g.: senior management or supervisory board). The Bank's Management guarantees to treat all such reports confidentially and to ensure that any employee reporting any concerns does not suffer any retribution as a result.

6. Guidelines for grievance meeting

The purpose of this meeting is to discuss the complaint with the aim of identifying all relevant issues such that the manager can decide in relation to the grievance either at the end of the meeting or shortly afterwards.

The Bank may offer the employee the opportunity to be accompanied to this meeting by a colleague where necessary, however, your companion is allowed to address the hearing and to confer with you, but not to answer questions on your behalf.

The reviewing manager may also hold a meeting with the person who the complaint is against and document all discussions.

At any level of the grievance process, the Bank's manager is expected to follow these principles:

- Meetings with the complainant in a private and enclosed office as it will build trust between the participants in this process.
- Listen: Do not brush off the complaint until you have heard it fully. Do not interrupt the employee's explanation. If you must ask questions, do so without becoming argumentative.

- Make sure you understand the complaint. Observe the time limits for making a reply but before you answer the complaint, make sure you understand the facts of the situation, the rules and policies which apply.
- Check all available records referenced as may be required. Check on proper interpretations of any policies or contract provisions. When in doubt, consult the HR Department.
- In preparing an answer and deciding, make sure your resolution is based on all the facts and is consistent with all the policies and other requirements involved. Beware of personal interpretation which might cause problems when applied to other parts of the Bank.
- Notifying the employee of your decision latest within 10 working days of the meeting
- Advising the employee of the appeals procedure, to whom the appeal should be addressed and the time limit for receiving the appeal.
- Communicating to the employee in writing regarding the decision reached with HR In correspondence.

7. Decision-Making On Grievances

Grievance should be resolved in a manner that is adequate for the Bank and the complainant. Decision making on grievance shall depend on several factors: Context, type of rights violation or damages, information received from the complainant and witnesses, applied protective measures and implementation of the final decision.

The following should be considered during the decision-making process:

- i. Discuss with the complainant on their expectations from the procedure and what decision would be adequate in their opinion.
- ii. If there are several possible resolutions that may be adopted per single grievance, together with the complainant, consider each and decide on the one yielding best result.
- iii. When adopting a decision on a grievance consider the interest of the company and the complainant.
- iv. Decision on the grievance must fully resolve the subject of the grievance, that is, improve the position of the complainant compared to the period prior to grievance.
- v. When adopting a decision on a grievance take care not to violate internationally recognized human rights of other persons that could be impacted by the grievance procedure.

8. Appeals Procedure 8

The employee has the right to appeal a decision in any Senior Management Team. Such an appeal must be in writing to be received by the Human Resources Department no later than 5 days after the original meeting.

The appeal will be sent to the respective Senior Manager whose role shall be to review the appeal and consider any new evidence, provide an independent view of the situation, and to review the original decision. The senior manager is responsible for:

- Deciding in relation to the appeal
- Advising the employee in writing of the outcome of the appeal
- Communicating the decision to the employee without unreasonable delay and ensuring complainant understand the final decision on the case.

9. Closing of Case

After the adoption of the decision on grievance, the case shall be closed. The bank will ensure the following.

- Prior to case closing, execute decision on grievance as agreed. The case shall be closed only when the decision is implemented, and all potential issues are followed up that may arise from the execution of this decision.
- Properly document all results, findings and measures taken, and secures that all grievances are properly recorded. This also provides useful for reporting, continuity in monitoring and evaluation of performance of our internal grievance procedures in the Bank.

10. Review and Revision

This Grievance Policy will be reviewed annually by the HR Department to ensure its effectiveness and compliance with relevant laws and regulations. Any necessary revisions will be made with input from employees and stakeholders.

11. Compliance

Failure to comply with this Grievance Policy may result in disciplinary action, up to and including termination of employment or contract.

12. Conclusion

It is the responsibility of all employees and stakeholders to familiarize themselves with this Grievance Policy and utilize its procedures when necessary. AB Microfinance Bank Nigeria Limited is committed to maintaining a respectful and supportive work environment where grievances are addressed promptly and fairly.