

Name: Complaint Management and Whistle Blowing Policy
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1. Introduction

The banking system relies on the effective operation of a range of “integrity systems & tools” for keeping the institution and its staff and management faithful and accountable. One of such tools/systems is the Complaint Management and Whistle Blowing Policy.

This policy is designed in furtherance of the bank’s desire to strengthen its core values: integrity, transparency and excellent customer service and at the same time to put a mechanism in place to fight against corruption and unethical behavior. The policy also aligns with the bank’s Code of Conduct and the Guidelines for whistle-blowing for banks and other financial institutions in Nigeria and the Code of Corporate Governance for Microfinance Banks as issued by the Central Bank of Nigeria in 2018.

AccessHolding, the majority shareholder of AB Microfinance Bank Nigeria, has put in place a Customer Protection Policy that all network banks including AB MFB Nigeria have fully adopted. All network banks of AccessHolding have endorsed the “SMART Campaign” and subscribed to its “Customer Protection Principles”. The Smart Campaign is an industry-wide initiative that unites microfinance institutions, networks, investors and donors in order to foster responsible lending and the protection of clients. It defined and propagates seven key principles on customer protection whereas the principles also incorporate an appropriate mechanism for complaint resolution.

The principles underlined in this policy shall apply to all staff of the bank in their dealings with the bank's customers and other stakeholders. The policy sets out guidelines, procedures and workflows that AB Microfinance Bank Nigeria has designed and adopted for the management of feedbacks, suggestions and complaints received from clients and other stakeholders.

The bank recognizes the importance of a well-managed complaints handling process in providing high quality customer service. The bank is accountable for its actions and decisions and customers and other stakeholders shall have the right to complain.

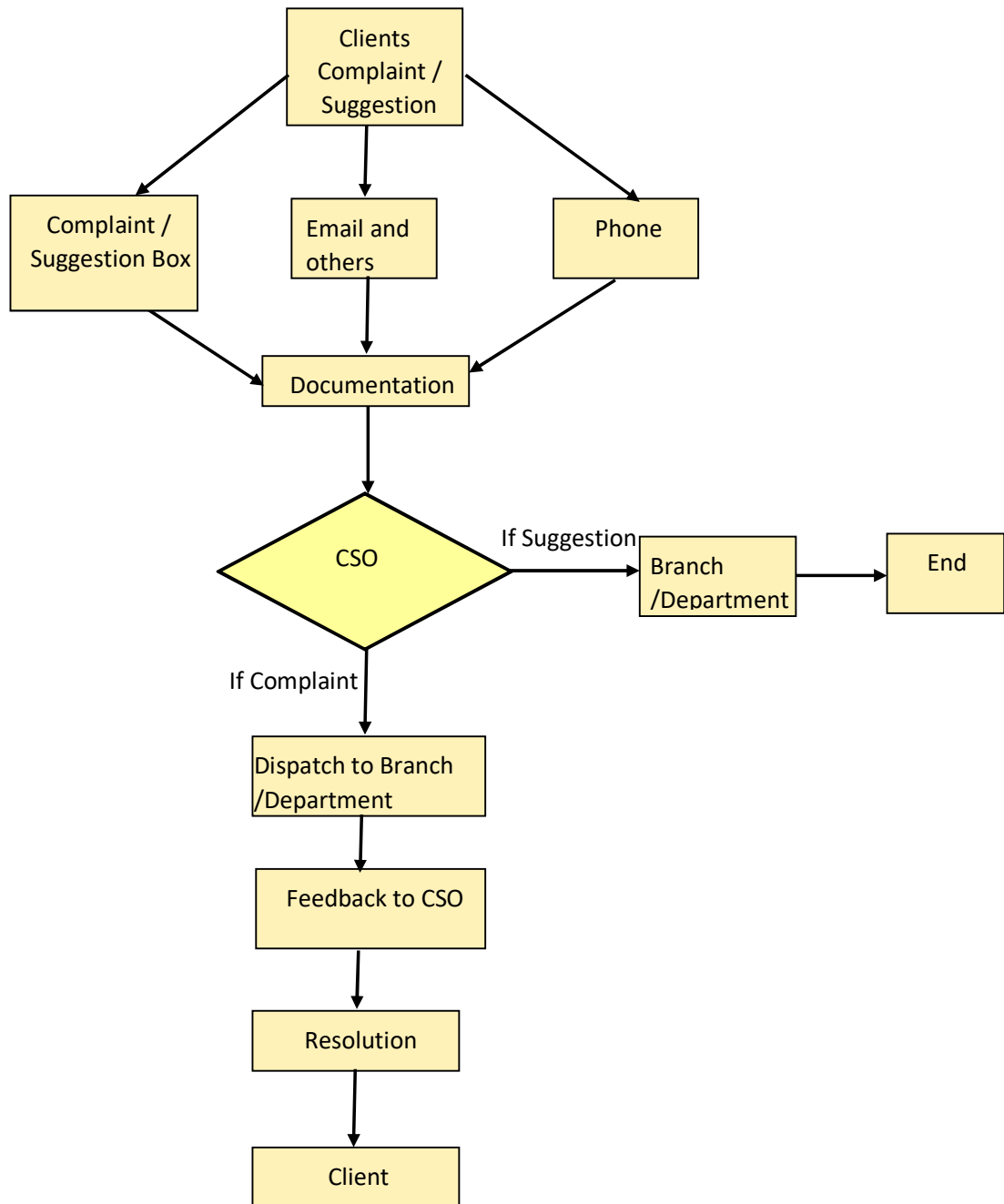
This policy does not apply to complaints of bank personnel associated with performance evaluations by supervisors, unsatisfactory probation reports or any other personal grievances. Any staffs who wish to complain on personal grievances should refer their complaints to Human Resources Department and other mechanisms established by the bank for such grievance.

2. Terms & Definitions

| | |
|---------------------------|--|
| BM | Branch Manager |
| CBN | Central Bank of Nigeria |
| Complaint | An expression of dissatisfaction with a specific action or service of an organization. |
| Complainant | A person, group, or company that makes a complaint. |
| Complaint Handling System | The way individual complaints are dealt with by the bank including policy, procedures and practices. |
| CSO | Customer Support Officer |
| HOD | Head of Department |
| HoIAF | Head of Internal Audit Function |
| MD/CEO | Managing Director/Chief Executive Officer |
| NDIC | Nigeria Deposit Insurance Corporation |
| RM | Regional Manager |

| | |
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| SRO | Senior Risk Officer (Compliance) |
| Suggestion | An idea or plan that is offered to an individual/organization for consideration. |
| Whistle –blowing | This is the reporting of alleged unethical conduct of employees, management, directors and other stakeholders of an institution by an employee or other person to appropriate authorities. |
| Whistle-blower | This is any person(s) including the employee, management, depositors, service providers, creditor and other stakeholder(s) of an institution who reports any form of unethical behavior, dishonesty or dissatisfaction to the appropriate authority. |

3. Complaint Management System



A. Complaints Management Channels

Client can lodge a complaint/suggestion through following complaint management channels:

- I. Customer Complaint/Suggestion box in all branches
- II. Email
- III. Direct call (09024969999)
- IV. Live Chat (Website)
- V. Chatbot (WhatsApp)
- VI. Social Media (Facebook)

B. Internal Handling

- I. Complaint/Suggestion is documented by the CSO including assigned number.
- II. Complaint/Suggestion is directed to the responsible person for review.
- III. In case of a suggestion, it's shared and dealt with internally by the Branch or Department.
- IV. In case of a complaint, the CSO directs the complaint to the concerned BM/HOD.
- V. When complaint involves Senior Management Team (SMT) it should be directed to the Board of Directors (BoD) and if it involves BM/HOD it should be directed to the SMT.
- VI. The concerned BM/HOD/SMT/BoD communicates the complaint resolution to the CSO.
- VII. The CSO or sometimes BM/HOD/SMT communicates the resolution to the client.

C. Communication and Resolution

Complaints will be resolved within a reasonable time frame in line with regulations. Complaints received would be resolved within the time specified in the timelines for complaints resolution by CBN in the **CBN-Consumer Protection Regulations 2019 Annexure D**.

Annexure D (Timelines for Complaints Resolution) of the CBN-Consumer Protection Regulations 2019 is considered a part of this policy.

For the purpose of feedback the following information is required while lodging a complaint:

- Name and contact details;
- Relationship with AB microfinance bank (e.g. client, guarantor);
- The complaint matter;
- Details of AB Microfinance Bank staff involved (if applicable);
- Copies of any documentation supporting the complaint (if applicable).

D. Essential Element of Complaint Management Systems

| Element | AB Microfinance Bank principles |
|--------------------|--|
| Commitment | Employees and the management of AB Microfinance Bank Nigeria are committed to efficient and fair resolution of complaints. We actively solicit feedback from our clients on a regular basis and acknowledge a client's right to complain. |
| Visibility | Our complaint management policy and procedures are available in all our branches and the bank's homepage. |
| Accessibility | Our complaint management policy and procedures are readily accessible to all employees and clients. The policy is easy to understand and includes details on lodging and resolving complaints. |
| Data collection | Information relating to complaints are collected, maintained and analyzed by the Customer Support Officer and the Risk Officer. |
| Resources | We have adequate resources for complaint handling and sufficient level of delegated authority. |
| Responsiveness | Complaints will be handled in an efficient and effective manner. All complaints will be treated courteously and equally. |
| Confidentiality | All complaints are treated confidentially and professionally. |
| Fairness | We recognize the need to be fair to both the complainant and the person against whom the complaint is made. |
| Accountability | Employees and management accept responsibility for effective complaints handling. The complaints handling team will ensure that, where appropriate, issues raised in the complaints handling process are reflected in employee performance evaluation. |
| Regular Assessment | Complaints are analyzed on a regular basis (weekly) for the identification and rectification of systematic or reoccurring problems and monitoring of timely resolution. |

Review

Our complaint handling process will be reviewed as required (for update on regulations) or at least every 2 years, to enhance its efficiency and delivery of effective outcome.

4. Roles and Responsibilities

CSO

- Receive complaints via direct call, email, live chat, WhatsApp and Facebook
- Generate a unique identification number and acknowledge complaints within 24 hours of lodgment including transcription of verbal complaints
- Reviewing complaints and allocating them to an appropriate BM/HOD for investigation and resolution.
- Reviewing, amending responses and findings from the BM/HOD(s) to ensure consistency, accuracy and completeness.
- Co-coordinating the resolutions for communication to the client.

BM/HOD

- Conduct investigations of complaints received from CSO.
- Seek advice from other department(s) where necessary to resolve a complaint.
- Reporting to CSO on complaint outcome after investigation and making probable recommendations or feedback to resolve or close the complaint
- Giving feedback to the complainants where necessary

SRO

- Coordinating the internal complaint resolution system together with the CSO.
- Collect complaint from Customer Complaint/Suggestion box in all branches and forward to CSO for documentation
- Response to written complaints from customers or request from CBN
- Follow-up on open complaints and analyzing CSO complaints' log
- Prepare monthly report on Complaint Management to Senior Management Team through Risk Management Committee
- Render quarterly return on Root Cause Analysis Report [RCAR] of complaints received to CBN

AB Microfinance Bank Staff

Staff members should ensure they have adequate knowledge and information about the complaint handling system and guide their clients accordingly.

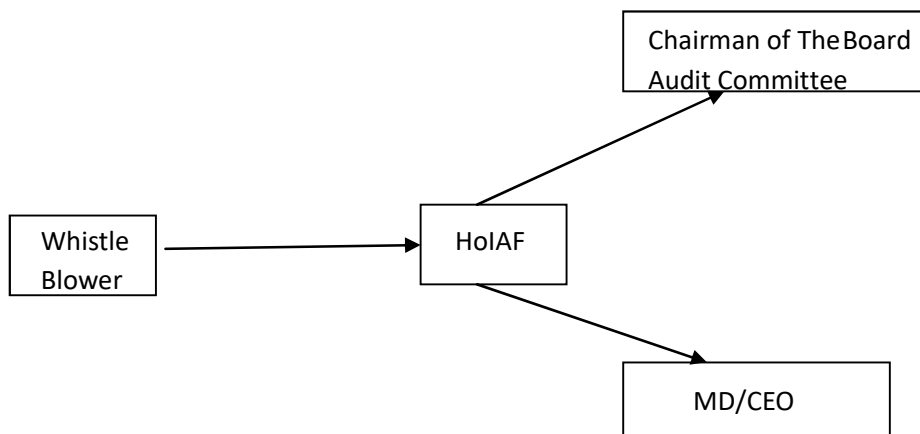
All suggestions/complaints should be lodged through any of the following channels;

- (a) Complaint/suggestion boxes in the banking halls of all AB Microfinance Bank branches.
- (b) Through a dedicated e-mail: customercare@ab-mfbnigeria.com
- (c) Through a hotline calling: +234 (0)9024969999
- (d) Website
- (e) WhatsApp
- (f) Facebook

5. Whistle Blowing System

The objective of whistle-blowing is to encourage customers and stakeholders to bring unethical conduct and illegal violations to the attention of an internal and or external authority so that actions can be taken to resolve the problem. The unethical practices may include any of the following:

- All forms of financial malpractices or impropriety or fraud;
- Failure to comply with a legal obligation or status;
- Actions detrimental to health and safety or the environment;
- Any form of criminal activity;
- Improper conduct or unethical behavior;
- Failure to comply with regulatory directives; Other forms of corporate governance breaches;
- Attempt to conceal any of these



A. Lodgment

Whistle-blower can report any unethical activity to the bank through a dedicated e-mail address: whistle-blowing@ab-mfbnigeria.com and phone line +234(0)9024969251

B. Internal Handling

- HoIAF receives and documents reports from whistle blowers.
- HoIAF reviews and investigates reported cases to come out with findings.

C. Communication and resolution

- HoIAF forwards a summary of reported cases and the result of the investigation to the Chairman of the Board Audit Committee when it involves Management and MD/CEO if it involves other employees.
- HoIAF reviews the reported cases and recommends appropriate action to be taken to the Board Audit Committee and MD/CEO respectively.
- The Board Audit Committee or MD/CEO shall take appropriate action within a reasonable time.

Reporting

The bank will provide a bi-annual returns on all whistle-blowing reports to the CBN at the end of June and end of December

Protection

The bank will ensure the protection of the whistle blower(s) who discloses their complaint provided the disclosure is made:

- (i) In good faith;
- (ii) In the reasonable belief that it is intended to show malpractice or impropriety.

The bank will ensure that all disclosures from a whistle-blower are treated in a sensitive and confidential manner and maintain as confidential the whistle- blower's identity unless;

- (i) Such person agrees to be identified;
- (ii) Identification is necessary to allow the bank or appropriate authority to investigate or respond effectively to the disclosure.

Whistle blowers can choose to remain anonymous in their disclosure. However, they are encouraged to disclose their name when filing reports to make their reports more credible.

Whistle-blowers are also protected from any detriment whatsoever which may include dismissal, termination, redundancy, undue influence, duress, withholding of benefits and or entitlements etc. anytime a disclosure is made.

6. Our Quality Control

Only the Risk Officer of the bank is in custody of the keys to the complaint/suggestion boxes of the bank's branches. Also only the HoIAF of the bank has the password to the dedicated e-mail and phone line for whistle-blowing. This is to ensure effective control and fairness in the complaint handling & whistle-blowing process.

Complaints will be analyzed by the Risk Officer on a quarterly basis for the identification of systemic or recurring problems. If such problems are identified, the Bank will consider what actions it may need to take to address these deficiencies. The complaints handling process will be reviewed as required (for update on regulations) or at least every 2years, to enhance its delivery of efficient and effective outcomes. This review will be performed by the Risk Officer. Where appropriate, issues that arise as a result of the complaints handling process may be incorporated in the process for monitoring and evaluating employee performance.