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COMPLAINTS RESOLUTION POLICY
VERSION 4
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APPROVAL



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RELATED PROCESSES/GUIDELINES

Process/Guideline Name
Complaints Resolution Process and Procedure
IT Service and Call Centre Call Logging Processes

APPROVAL

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DEFINITIONS & ABBREVIATIONS

Descriptions of acronyms and terms

Acronym/Term	Description
'the bank'	Ubank Limited
Exco	Executive Committee
ERC	Enterprise Risk Committee
Complaint	Any expression of dissatisfaction (justified or unjustified) or grievance conveyed to the Bank either verbally or in writing, through any channel. The complaint may relate to damages that can or have been suffered by the customer or it can be a request for corrective measures
Complainant	Anyone who expresses a complaint with the Bank
Query	A question about something, especially in order to express doubt or request clarity on a customer's account or product.
Customer	An individual or entity that purchases our products for consumption or the representative of the consumer
Code of Banking Practice	A voluntary code that sets out the minimum standards for service and conduct customers can expect from banks with regard to the services and products offered. The Code is a guide for customers transacting with banks that are members of the Banking Association of South Africa and it helps customers to better understand their rights and responsibilities as well as the banks' responsibilities in serving customers.
Principles of the Code of Banking Practice	FAIRNESS, TRANSPARENCY, ACCOUNTABILITY AND RELIABILITY.
"Our values"	The Bank's values: Passion, Empowering, Excellence, Respect and Sincerity
"Our Customer Promise"	The Bank's Customer Promise: Partnerships, Nurturing Relationships, Educating and Empowering, Ubuntu Principles
"set criteria"	Policies, Processes, Terms and Conditions, our Values, our Customer Promise, the Code and the law
"the Code"	The Code of Banking Practice
BASA	Banking Association of South Africa

1. INTRODUCTION

Ubank is an accountable financial services provider that is committed to providing a framework that provides guidance on how we receive, manage, respond and monitor complaints within our realm. We are committed to treating all stakeholders with dignity and respect, being transparent, proactive and responsive in all dealings with them. The bank is driven by the spirit of Ubuntu and thus places the stakeholders we serve at the centre of our work. Ubank customers are the heart of the business which strives to deliver the Customer Service and Operational Excellence pillars every day. In this respect, Ubank employees need to remain alert and sensitive to all customer complaints and compliments, which should all be taken seriously and treated in line with the bank's values.

Customer protection bodies which ensure that customers are informed of what to expect from different banks and treated as required, such as the Ombudsman for Banking Services, Financial Advisory and Intermediary Services (FAIS) Ombudsman and the National Credit Regulator (NCR), all provide the banks with an opportunity to resolve the complaints independently first before they arbitrate.

The bank seeks to satisfy the prescribed requirements to treat customers fairly in all our dealings; thereby ensuring that customers are given clear information and are kept appropriately informed before, during and after the time of contracting; they do not encounter any irrational post-sale barriers to change products or services and the submission of a complaint. All customer complaints are to be recorded on a central complaints management system that will allow the bank to properly monitor and generate regular reports for analysis and distribution to senior management and relevant governance structures.

2. PURPOSE

The reasons or needs for this policy to be put in place are to:

- Provide rules to be followed by Ubank employees when handling customer complaints.
- Ensure efficiency and consistency in handling and resolving customer complaints.
- Ensure customers have an efficient platform to communicate their complaints, while being confident that their complaints and concerns are listened to and acted upon promptly and fairly.
- Assist in identifying customers' unfulfilled needs on products, processes or service related features which could and should lead to business development.
- Identify causes of complaints and remedies required such as the review of delivery standards, training programs and corrective measures.
- Recording and reporting on complaints will allow the bank an opportunity to analyse and review possible strengths and weaknesses on a regular basis.

3. SCOPE

- The Complaints Resolution Policy rules for handling all customer complaints received in the bank via all available mediums such as branch, call centre, registered mail, customer mediation institutions (e.g. Ombudsman offices, NCR), social media or service rating websites such as Hellopeter.
- This policy applies to all Ubank employees (permanent or temporary), consultants, service providers and its agencies.

4. OBJECTIVES

The objectives of this policy are as follows:

- To provide principles for maintaining all complaints recorded onto an electronic complaints management system.
- To facilitate the process of ensuring that customers' complaints are resolved with ease, convenience and limited need for resorting to third parties.
- To ensure that all customers are empowered on how to lodge complaints and the process of lodging these complaints is accessible, convenient and seamless.
- To ensure that customers' complaints are acknowledged timeously, progress is communicated frequently, and the complaints are resolved efficiently.
- To nurture relationships through ensuring that unhappy customers are converted into satisfied customers by ensuring that their complaints are handled as swiftly as practicable.
- To provide timely responses that are aligned to our service level agreements and in line with industry standards, product terms and conditions, our values, our customer promise, the Code of Banking Practice and other related regulatory requirements.

5. PRINCIPLES/VALUES

By implementing this policy, the bank will address/reinforce the following values that it subscribes to:

- Passion – Going the extra mile, being bright and attentive, showing positive energy and commitment with pride and enthusiasm.
- Respect – Remaining open minded and considerate, listening and hearing others out, equality and treating each other with dignity.
- Sincerity – Delivering on our promises, having caring, open conversations, and always being there and being easy to talk to.

At Ubank we value all our stakeholders and thus will endeavour to proactively anticipate and resolve all complaints amicably to provide the best amenable solutions, thereby ensuring that we protect and enhance our reputation.

6. INTERVENTIONS

The implementation of the Complaints Resolution Policy will ensure:

- The bank remains an accountable institution committed to establishing and implementing a diligent complaints handling mechanism.
- The bank affords an accessible, efficient and effective complaints handling environment that will not create any undue bureaucracy.
- Continued improvement on learnings and accountability to strengthen relationships between the bank and its stakeholders.
- A response on the complaint will take full account of the complainant's concerns and feelings, and thus where a mistake is on the bank's side, an apology with the full explanation and assurance that the occurrence shall not be repeated, should be given to a complainant.

7. RISKS CONTROLLED BY THIS POLICY

The policy seeks to control the risks listed below:

Risk Category	Description of Risk
Compliance/Regulatory risk	Compliance risk is the risk of penalties and/ or sanctions arising as a result of failure to comply with any statutory requirements applicable to the bank. In view of the nature of the bank's business, this will include regulatory risk, that is, the risk that the bank does not comply with applicable law, regulations and supervisory requirement imposed by various regulatory bodies.
Operational Risk	Risk of direct or indirect loss resulting from inadequate or failed internal processes, people and systems or from external events. It can cause financial loss, reputational loss, loss of competitive position or regulatory sanctions.
Customer Risk	The risk that the bank's products and services might be inadequate, resulting in a decline in profitability due to the inability to retain current customers or attract new ones.
Reputational Risk	The risk to earnings or capital arising from negative public opinion affecting the Bank's ability to establish new relationships or services, or continue serving existing relationships. It can cause a loss of confidence resulting in the Bank losing its depositor funding and suffering a liquidity crisis.
Fraud Risk	An internal act by one or more individuals among management, those charged with governance, employees, or third parties, involving the use of deception to obtain an unjust or illegal advantage. Deception to make a personal gain dishonestly for oneself and/or create a loss for another. Plainly speaking, fraud involves a perpetrator committing a deceptive act to obtain a benefit.

8. POLICY RULES

8.1 OVERVIEW

- 8.1.1 All customer complaints received on either of the platforms and or any customer touch points will be referred to the Call Centre for immediate recording on the CRM system. A call reference number will be automatically generated by the CRM system and should be provided to the complainant immediately.
- 8.1.2 All customer complaints logged on the CRM system must be tracked and all actions and outcomes recorded accordingly.
- 8.1.3 Customers must be enabled to log calls through the following internal channels:
- Physically at the branch
 - Telephonically through the customer call centre on 086000 8322
 - Via email on callcentre@ubank.co.za or customercare@ubank.co.za
 - Letters sent by registered mail to :
 - Ubank CustomerCare
 - Private Bag x 0003
 - Halfway House, 1685

- 8.1.4 All customer complaints must be logged on the Customer Relationship Management (CRM) system and acknowledged with a Reference number that must be provided to the customer.
- 8.1.5 Employees assigned with the responsibility to resolve the customer complaint should acknowledge receipt and indicate the expected resolution time within 24 hours.
- 8.1.6 The assigned employee, Call Centre Agent and management shall be responsible for ensuring that feedback is communicated to the customer within this time frame.
- 8.1.7 All customer complaints must be resolved within 7 business days from the initial date on which the complaint was lodged.
- 8.1.8 Complaints that are not resolved within 7 business days must be escalated to the Customer Service Management team which will review the merits, motivate for a prompter response and/ or further escalation to the relevant executives, where necessary.
- 8.1.9 All customer complaint resolutions must be aligned to the relevant Policies, Processes, The Code Of Banking Practice and relevant regulatory requirements.
- 8.1.10 If the customer is not happy with the feedback provided by the Call Centre, the complaint must be escalated to Customer Service Management for further discussion and resolution.

8.2 Handling customer complaints received at the branch

- 8.2.1 Complaints logging in the branch must be performed through the branch Service or Sales Consultants.
- 8.2.2 The complaints recipients (Service or Sales Consultants) must ensure that they obtain detailed information to enable proper understanding of the nature of the customer complaint.
 - If it is an enquiry, it must be resolved in line with the relevant operational policies, processes and procedures.
 - If it is a complaint, it must be captured on the CRM system and the reference number be received and noted.
- 8.2.3 The customer must be provided with the reference number, potential timeline for resolution, and the Call Centre contact details
- 8.2.4 Customer should be contacted within 24 hours for the resolution feedback or status update.

8.3 Handling customer complaints received at the Call Centre

- 8.3.1 Complaints logged at the call centre must be performed through the Call Centre Agents or Management or the CallCentre on 086000 8322, callcentre@ubank.co.za or customercare@ubank.co.za
- 8.3.2 The complaints recipients (Call Centre Agents or Management) must ensure that they receive detailed information to enable a proper understanding of the nature of the query or complaint.
 - If it is an enquiry, it must be resolved in line with the relevant operational policies, processes and procedures.
 - If it is a complaint, it must be captured on the CRM system and the reference number should be provided to the customer.
- 8.3.3 The customer must be provided with a reference number, and advised that they will be contacted to provide resolution or expected resolution time.
- 8.3.4 The complaint must be escalated to the relevant department for resolution

8.4 Customer complaints assigned to the responsible departments

- 8.4.1 Employees assigned with the responsibility to resolve the customer complaint should acknowledge receipt within 24 hours, ideally with an indication of the expected resolution time. The Bank must communicate the expected resolution time within 2 business days at the most if the complaint is not resolved.

- 8.4.2 The resolving employee is responsible for providing an update and the responsible line manager is expected to ensure that the time frame is adhered to.
- 8.4.3 Call Centre is responsible for facilitation and escalation to management where contraventions might occur, and providing progress to the customer.
- 8.4.4 All complaints must be resolved within 7 business days. An estimated time frame not exceeding 7 business days from the initial date on which the complaint was logged should be provided to the customer.
- 8.4.5 The department responsible should clearly communicate the resolution statement, in writing and with supporting documents if required by the customer or Call Centre.
- 8.4.6 Business Unit handling the complaint to resolve and provide resolution statement, in writing if requested.
- 8.4.7 Call Centre will facilitate and provide feedback to the customer
- 8.4.8 If the complaint is unique and the resolving department can in no way resolve the complaint within 7 business days, feedback with background on why the complaint cannot be resolved within this time frame must be communicated to the Call Centre and/or Customer Service Manager. The Customer Service Management Manager will review the merits, negotiate for prompter responses, accept or escalate to relevant executive/s where necessary.
- 8.4.9 The responsible Business Unit shall ensure that all responses provided are aligned to the relevant policies, processes, terms and conditions, our values, our customer promise, the Code of Banking Practice and other regulatory requirements. In events where these are in contradiction, the Code of Banking and other regulatory requirements shall take precedence The Business Unit handling the complaint.
- 8.4.10 The complaint must be escalated with all the background information to the Customer Service Manager for the final opportunity to resolve the complaint (If the customer is unhappy with the response provided by the business).
- 8.5 Handling customer complaints received from customer mediation/ protection institutions**
- 8.5.1 The Customer Service Manager must handle all complaints which have been escalated by Call Centre as a result of the inability to satisfy the customer with the response provided or have been escalated by customer mediation/ protection institutions such as Ombudsman for Banking Services, Financial Advisory and Intermediary Services Ombudsman and National Credit Regulator.
- 8.5.2 The Customer Service Management team must verify and ensure that the resolution provided by the responsible department is aligned to the relevant policies, processes, terms and conditions, the Code of Banking Practice and other regulatory requirements.
- 8.5.3 The Customer Service Manager must facilitate and provide recommendations and is required to ensure that final resolution is provided within timeframes aligned to industry requirements.
- 8.5.4 Customer Service Manager must escalate complaints to relevant line management or Executives if recommendations are unreasonably rejected and or there is unnecessary delays in responses.
- 8.5.5 Business unit must provide information in writing if required, reviewing its resolution as per the Customer Service recommendation based on the set criteria, implementing or advising in writing why recommendation cannot be implemented.
- 8.5.6 The Customer Service Manager must provide final feedback to the customer and the customer mediation/ protection bodies, in writing.

8.6 Handling customer complaints received from service rating websites

- 8.6.1 The Customer Service Manager shall handle all complaints which have been reported on service rating websites, such as HelloPeter and Social Media on:
- Facebook page on UbankSA
 - Twitter handle @UbankSA
- 8.6.2 The above channels must be continuously monitored in order to identify complaints related to the bank.
- 8.6.3 Complaints identified via these channels need to be discussed with the complainant, in order to receive detailed information to enable for proper understanding the nature of the complaint.
- 8.6.4 Once detailed information is received, the customer must be advised that the complaint will be logged on the CRM system and a reference number will be issued.
- 8.6.5 The customer complaint must be logged on the Customer Relationship Management (CRM) system and acknowledged with a Reference number that must be provided to the customer.

9. ROLES AND RESPONSIBILITIES

A particular division, department or committee responsible for the activities of the processes governed by this policy will fulfil the roles defined in this policy. Below are the different roles responsible for fulfilling the policy.

9.1 Executive Committee/ Board Committee:

- The Social and Ethics Committee shall review and approve all changes to this policy.
- The Executive Committee is responsible for reviewing and recommending for approval, all changes to the policy.
- Exco shall support the structures, processes and changes necessary for the effective implementation of this policy.

9.2 Enterprise Risk Committee:

The Enterprise Risk Committee shall review and recommend this policy and changes thereto, for approval by Exco (or further recommendation to the relevant Board Sub-Committee).

9.3 Service Delivery: Customer Service Team

The Customer Service team is responsible for the following:

- Identifying customer service training needs for colleagues authorised to provide advice to customers and support in ensuring that they receive regular training on our products, services, processes and systems in order to ensure efficiency and fairness in the Bank's dealings with customers.
- Support the business in identifying and rectifying barriers to the effective implementation of this Complaints Resolution policy.
- Ensure that all colleagues are educated on the contents of this policy, process and procedure through effective communication measures with the support of management
- Periodically distribute reports of recorded complaints to relevant departments and committees for review.

- Ensure that the Ombudsman for Banking Services contact details are prominently displayed at branches.
- Ensure that customers are informed on the complaint process and facilitate the ease of access to the Bank's complaint reporting channels.
- Facilitate the resolution of all escalated customer queries and manage all external regulatory or mediated complaints and continuously pull learnings from all complaints logged.
- Support in ensuring that the inclusion of key performance indicators that measure the implementation of this policy are included in the scorecards of colleagues with a direct impact on the effective implementation of this policy.
- Provide support in ensuring that the business has relevant systems and forums for this policy to be effective.
- Develop and update service level agreements between Customer Service and supporting business units to support effective implementation of this policy.
- The Customer Service team shall provide complaints resolution time frames and may provide recommendations for delivery in alignment with customer mediation/ protection/ regulatory body's requirements, and the relevant business area shall be responsible for resolving the complaint in line with this advice.

9.4 Human Resource Department

The Human Resource Department is responsible for the following:

- Responding to needs identified by the Customer Service Department and ensuring that relevant training is provided to facilitate adherence to this policy.
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- Providing support in ensuring that the inclusion of key performance indicators that measure the implementation of this policy are included in the scorecards of colleagues with a direct impact on the effective implementation of this policy.

9.5 Risk Department:

The Risk Department is responsible for:

- Review of this policy and updates thereto in line with the policy formulation policy and relevant risk management requirements.
- Providing guidance on the risks and controls related to handling customer complaints.

9.6 Compliance Department:

The Compliance Department is responsible for providing guidance with regards to the regulatory requirements related to the Complaints Resolution policy.

9.7 Internal Audit

Internal audit is responsible for providing an independent assurance on the compliance with the Complaints Resolution policy and related policies.

9.8 Heads of Departments, Regional Managers, and Branch Managers

The managers above are responsible for:

- Keeping track of customer queries and complaints affecting their departments, branches, front-ends or areas and ensuring that this policy and its process and procedure are adhered to by colleagues.
- Ensure that all customer complaints in their unit are resolved within 7 business days.
- Ensuring that smart objectives for the application of this policy are outlined and measured in the performance scorecards of colleagues involved in resolving customer complaints
- Management shall ensure that relevant resources and service level agreements are in place to support the requirements of this policy.
- Management shall provide support in drawing and updating the service level agreement between the relevant supporting business unit and the Customer Service Department.
- Ensuring that efficiency and effectiveness is enforced as a culture, the complaint resolution does not delay unreasonably and timeframes are adhered to.
- Identifying trends that may have an undesirable impact on the service experienced by customers, resolving within area of expertise or escalating for resolution to the relevant department in order to facilitate a more proactive approach to the management of our customer experience.
- The relevant department will have the responsibility to ensure that reoccurrences of complaints are minimized.

9.9 All employees, contractors and consultants (or specific functional personnel)

The employees are responsible for adherence to this policy and its process and procedure.

10. RELATED DOCUMENTS

This document should be read in conjunction with the following related documents:

- The Code of Banking Practice
- Code Ethics
- Brand and Corporate Identity Policy
- Ubank Language Usage Policy

11. VIOLATION REPORTING

- 11.1 All violations of the Complaints Resolution Policy shall be reported to the accountable Executive Manager and Chief Risk Officer.
- 11.2 All employees are expected to comply with the terms and conditions of employment as prescribed in their employment contracts. Any employee violating approved policies and procedures including the Complaints Resolution Policy shall be dealt with in accordance with the internal disciplinary process or any legal process as deemed appropriate by the management of Ubank.

11.3 The escalation procedure for this policy shall be as follows:

- When a violation of the policy is reported or noted, the employee or entity concerned shall be requested to rectify the violation immediately.
- Should the violation be internal and the issue is not rectified within a reasonable length of time (not exceeding 7 days) the violation will be escalated to the relevant head of department, regional manager, brand champion, and branch manager.
- Should the violation continue the next escalation level would be to the accountable Executive Manager and Chief Risk Officer.

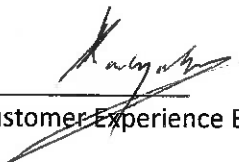
12. MAINTAINING THIS POLICY

- This policy forms part of the Service Delivery policies of Ubank and is formulated in the interest of effective governance of all Customer complaints activities.
- The Service Delivery Department is responsible for the maintaining of this policy document.
- This policy needs to be regularly reviewed and updated. The reviews shall take place as and when required but not less than 3 years.


13. APPROVAL

Considered and recommended by the Executive Committee at their meeting of 15 October 2019; and

Approved by the Social and Ethics Committee at their meeting of 03 December 2019.



Customer Experience Exec.



Company Secretary

