

UBANK LANGUAGE USAGE POLICY

VERSION 2

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TITLE PAGE

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RELATED PROCESSES/GUIDELINES

Process/Guideline Name
Not applicable

APPROVAL

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DEFINITIONS & ABBREVIATIONS

Descriptions of acronyms and terms

Acronym/Term	Description
'the Bank'	Ubank Ltd

1. INTRODUCTION

Ubank is dedicated to the upliftment of the workers, their families and communities within Southern Africa, through providing them with access to affordable financial services in a way that builds relationships, educates and empowers customers.

This includes addressing customers in their own languages, whenever possible. The Bank's customer research indicates that customers very strongly associate "speaking our languages" as an important attribute of the Bank.

2. PURPOSE

2.1 The Language Usage Policy has been developed to formalize and provide guidelines for language usage in terms of customer communication.

3. SCOPE

3.1 The Language Policy presents rules of implementation of language usage across all customer communication touch points.

3.2 The following areas are covered by this policy:

- Current languages used by the Bank
- Language breakdown per region
- Credit related documentation
- Marketing and advertising printed material
- Website and ATM screens
- Verbal communication

3.3 This policy does not cover:

- Internal printed or verbal communication
- Tone and language descriptors used – this is covered in the Brand Corporate Identity Policy

4. OBJECTIVES

4.1 To ensure that all languages used in customer communication are relevant to the dominant language(s) spoken, throughout our distribution network

4.2 To ensure alignment and compliance to the regulatory policies of relevant industry bodies, such as the Consumer Protection Act and National Credit Act

4.3 To formalize the Language Usage Policy within the Bank.

4.4 To establish responsibility for the maintenance and enforcing of the standards/policy on an ongoing basis.

5. PRINCIPLES/VALUES

- 5.1 Implementation of this policy should address misunderstanding issues that could arise as a result of language usage.
- 5.2 Implementation of this policy will also reinforce the Bank’s Brand positioning.

6. RISKS CONTROLLED BY THIS POLICY

6.1 The policy seeks to control the risks listed below:

Risk Category	Description of Risk
Regulatory Risk	Adherence and compliance to the National Credit Act and Consumer Protection Act

7. POLICY RULES

7.1 Current languages used by the Bank

- In addition to English as the general business language, the Bank translates customer communication into the following languages, within South Africa:
 - Xhosa
 - Zulu
 - Setswana
 - Sesotho

The above languages are dominant in the Bank’s distribution network. However when necessary or requested, Marketing communication is also translated into Sepedi and Tsonga.

- In addition to the above, customer communication applicable to foreigners from Mozambique and Swaziland, is translated into:
 - Swati
 - Portuguese

Foreign customers from Botswana and Lesotho are catered for in the dominant languages.

7.2 Language breakdown per region

English is the official business language. All banking documentation is available in English in order to be managed within the normal business processes. Where a vernacular version is not available, regional staff are able to explain the content to the customers in a vernacular language of the customer’s preference.

The table below gives a clear indication of the dominant languages and the areas they are relevant to our customers, throughout our branch network.

Province	Branch Network	Dominant Languages
Gauteng	Johannesburg	English Zulu Sesotho
	Pretoria	English Setswana Sepedi
	Randfontein	English Setswana
North West	Carletonville Klerksdorp Rustenburg Brits	English Xhosa Setswana Sesotho
Mpumalanga	Evander Burgersfort	English Zulu Sepedi
Free State	Welkom	English Sesotho
Limpopo	Northam	English Sepedi Setswana Tshivenda (Limited Tsonga)
Eastern Cape	Mthatha Mquanduli Lusikisiki Ngcobo Flagstaff Dutywa Matatiele Tabankulu Bizana Butterworth Mount Frere East London Port Elizabeth	English Xhosa Sesotho (Matatiele only)

7.3 Credit-related documentation

- The following credit documentation is available in English and the dominant languages (Sesotho, Setswana, Zulu and Xhosa):
 - Pre-agreement Statement and Quotation
 - Loan Agreement/Contract
 - Enforcement Notices (Section 129 Letter)
 - Loan Statement

7.4 Marketing and Advertising printed material

- All the product marketing material is translated into the dominant languages relevant to the specific region.

- Marketing material related to Pricing is also translated into Sepedi and Tsonga for the Limpopo region.
- Advertising is predominantly in English, but relevant vernaculars are also used in regional publications

7.5 Website and ATM screens

- Currently the website is English only
- ATM screens are available in English and the relevant regional vernaculars

7.6 Verbal Communication

- Branch Servicing
The Bank employs staff from the communities surrounding the branch network. As a result, customers are served in the dominant languages relevant to that region, in addition to English.
- Promotions
All promotions are conducted in the relevant regional vernaculars and English.
- Customer Call Centre
Customers can be helped in all the 11 official languages by the call centre agents.
- Advertising
Radio advertising and interviews are conducted in the relevant regional vernaculars

8. ROLES AND RESPONSIBILITIES

8.1 Marketing Department:

Marketing is responsible for the following:

- Ensuring all product marketing material is available in the relevant vernacular languages and English.
- Ensuring promotions are conducted in the relevant languages for each region.
- Ensuring advertising is in the relevant languages for each region.
- Assisting with translations of relevant documentation as and when requested by other departments.

8.2 Retail Banking Services

The abovementioned Department is responsible for:

- Ensuring the branch network has sufficient stock of all documentation and marketing material in the relevant languages for the customers they serve.
- Ensuring branch staff are able to assist and serve customers in the relevant regional dominant languages

8.3 Service Delivery Department

The abovementioned Department is responsible for:

- Ensuring the Customer Call Centre is staffed by agents who are proficient in all the 11 official languages.

8.4 Heads of Departments, Regional Managers, and Branch Managers

The managers above are responsible for:

- Ensuring full adherence to the policy by the regions.
- Ensuring that issues of non-compliance are rectified.

8.5 Executive Committee

The Executive Committee of Ubank is responsible for approving all changes to the policy and dealing with issues of violations of the Language Policy when related matters are escalated.

9. RELATED DOCUMENTS

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

- The Brand Corporate Identity Policy (Ubank Language Guidelines)

10. VIOLATION REPORTING

10.1 All violations of the Language Policy shall be reported to the accountable Executive.

10.2 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 Language Policy shall be dealt with in accordance with the internal disciplinary process or any legal process as deemed appropriate by the management of Ubank.

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

10.3.1 When a violation of the policy is reported or noted, the employee or entity concerned shall be requested to rectify the violation immediately.

10.3.2 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.

10.3.3 Should the violation continue the next escalation level would be to the accountable Executive.

11. MAINTAINING THIS POLICY

11.1 This policy forms part of the Marketing policies of Ubank and is formulated in the interest of effective governance of all customer interaction as far as language usage is concerned.

11.2 The Marketing Department is responsible for the maintaining of this policy document.

11.3 This policy needs to be regularly reviewed and updated. The reviews shall take place as and when required but no less than annually.