

STANBIC BANK ZIMBABWE LIMITED COMPLAINTS HANDLING PROCEDURE

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STANBIC BANK ZIMBABWE LIMITED (THE BANK) COMPLAINTS HANDLING PROCEDURE

1. OBJECTIVE

The purpose of this procedure is to establish clear guidelines and procedures for handling complaints to enable the Bank to comply with banking regulations and to identify, monitor, measure and control reputation risk associated with service delivery and contact with external stakeholders. The procedure directs how complaints are managed in the Bank.

The Bank is committed to promoting the highest standard of service for its clients, including professionalism and efficiency. The Bank is committed to resolving complaints in a timely manner with due regard to the following:

- i. **Commitment:** The Bank is committed to efficient and fair resolution of complaints by all in the Bank at all levels. We acknowledge consumers' rights to complain and actively solicit feedback from customers.
- ii. **Fairness:** The Bank recognizes the need to be fair to the complainant, the person against whom the complaint is made (where applicable) and the organization.
- iii. **Capacity:** The Bank shall put in place adequate resources for complaints handling with sufficient levels of delegated authority. We further identify the need for complaints to be reviewed by someone in an independent position (i.e. someone who was not involved in the matter which has been raised).
- iv. **Visibility:** The Bank's complaints handling procedure shall be communicated to all staff members and shall be accessible to the Bank's clients and external stakeholders. The complaints handling procedure and supporting information shall be easy to understand.
- v. **Assistance:** The Bank shall assist complainants with lodging a complaint (where required).
- vi. **Responsiveness:** Complaints shall be dealt with promptly and the complainants shall be treated courteously.
- vii. **Remedies:** The Bank will aim to find and implement available remedies to exhaustion.

2. DEFINITION AND SCOPE

Complaints shall include matters relating to the below mentioned but are not limited to the following:

- i. Financial loss by a complainant as a result of failure on the part of the Bank in the provision of a product and or service pursuant to the contract;
- ii. Failure to provide appropriate advice/information;
- iii. Poor service delivery;
- iv. Failure to meet standards and or codes of conduct; and
- v. Breach of Terms or Conditions.

3. RECEIVING A COMPLAINT

- i. Complaints shall be recorded as outlined in this procedure. It is preferred that complaints are received in writing (including via letter, email (zimccc@stanbic.com) and via our website (using WebChat). Verbal complaints (e.g via telephone or walk in) will be accepted under this process and records of same shall be retained by the designated resources.

4. WRITTEN COMPLAINTS

The written complaint shall clearly state:

- i. The exact dissatisfaction with the product and or service; and
- ii. Any financial loss which has been suffered by the complainant.

5. VERBAL COMPLAINTS

- i. Customers can use the following toll-free numbers to submit their complaints telephonically:
Econet: 08080216
Telone: 08025777
NetOne: 08010045
Telecel: 0731950950/953/954
- ii. All complaints by telephone and face to face shall be dealt with using the following acronym;
A Answer each call in a positive way;
L Listen to what the complainant is saying;
E Empathize with what they are saying (but do not admit liability without conducting adequate investigation);
R Repeat/ reinforce your understanding of the situation;
R Resolution: offer them a resolution to the situation (within the confines of the procedure);
and
T Terminate the call in a positive manner.
- iii. It is desirable that complaints are submitted in writing by the complainant. Should the complainant wish to complain verbally, then the following process should be followed:
 - a. Identify yourself, listen, record details and determine what the complainant wants;
 - b. Confirm the details received;
 - c. Empathize with the complainant;
 - d. Explain the courses of action available;
 - e. Do not attempt to lay blame or be defensive;
 - f. Resolve the complaint if possible or commit to doing something immediately, irrespective of who will ultimately handle the complaint;
 - g. Ensure that the complainant is informed that the complaint is receiving attention, without creating false expectations;
 - h. Check whether the complainant is satisfied with the proposed action and, if not, advise alternative courses of action; and
 - i. On completion of the conversation with the client, the employee will compile a file note of the conversation for the purposes of retaining sufficient records of the complaint. Details of the file note must be recorded in the complaints register.

For both verbal and written complaints, the complainant should provide information relating to his/her complaint in the form that fits their circumstances, for example, in accordance with their literacy level.

6. ASSURANCE

We must assure the complainant of the Bank's commitment to resolve the issue.

7. COMPLAINTS PROCESSING AND RESOLUTION

The following process should be followed to resolve complaints:

- i. Acknowledge customer's complaint in writing within 48 hours of receipt;
- ii. Immediately communicate complaint to the Branch Manager or Customer Service Officer (for complaints in business units outside the branch);
- iii. The Branch Manager or Customer Service Officer shall work in liaison with any additional employees (where necessary) to ensure that the complaint is resolved within 48 hours of receipt. The Branch Manager or Customer Service Officer must engage relevant employees and relevant departments to discuss the complaint and develop an immediate action plan to resolve it and maintain written records of steps taken to resolve the complaint. The complaint must be investigated competently, promptly and impartially;
- iv. The client must be informed of the point of contact for their complaint and advised of the criteria and process for the investigation and resolution of the complaint, including the avenues for further review, applied by the Bank in dealing with complaints. The employee assisting the client must explain their rights to them while being patient and courteous;
- v. The Branch Manager or Customer Services Officer must ensure that the complainant is familiar with the Procedure. The client must be advised that they have the right to be heard and can supply material in support of their complaint. The complainant may be given a summary of the Procedure should they request it or if they are unfamiliar with the process;
- vi. The Branch Manager in each branch and the Customer Service Officer (outside the branch) is tasked with ensuring complaints are investigated and resolved in accordance with this Procedure;
- vii. The name and contact details of the relevant Branch Manager or Customer Service Officer is available in the Bank's branches or offices; and
- viii. Where a complaint cannot be resolved within 48 hours, the complainant must be advised of the delay and provided with a regular update on the progress of the investigation of the complaint at intervals of not greater than seven (7) days. Records of all updates and follow ups should be maintained for at least 5 (five) years.

8. RESPONSE TO CLIENT ON OUTCOME OF INVESTIGATION

- i. A response to a client shall be given within 48 hours of completion of the investigation. The response must be delivered by written or electronic means and in a manner that is fair, clear and not misleading and in a language comprehensible to the consumer.
- ii. The response will at a minimum include the following:
 - a. How the Bank assessed the complaint and the reason for the decision;
 - b. Address the issue raised in the initial complaint;
 - c. Refer to applicable provisions in legislation, codes, standards or procedures; and
 - d. Where a complainant has a right of referral to another body, this should be clearly indicated in the decision letter; and
 - e. Details of any offer of remedial action or redress.
- iii. Where a form of remedial action or redress is offered, and the complainant accepts, the Branch Manager or Customer Service Officer must ensure that such offer of remedial action or redress is complied with.

9. RESPONSIBILITIES OF BRANCH MANAGERS AND CUSTOMER SERVICE OFFICERS:

Customer Service Officers and Branch Managers should do the following when managing complaints:

- i. Liaise with responsible officers and monitor progress being made in resolving complaint;
- ii. Ensure maintenance and accessibility of complaints registers and procedure;
- iii. Assist the business with development of action plans for complaints;
- iv. Ensure escalation to the appropriate level of management of complaints that require attention at that level; and
- v. Review all Complaints Registers at point of representation on a quarterly basis for the purpose of providing analysis on systemic and recurring problems. This analysis will assist the Bank to:
 - a. determine the cause of complaints and whether remedial action is warranted;
 - b. identify and rectify systemic and recurring problems;
 - c. redesign products and services;
 - d. change organizational practices and procedures;
 - e. retrain staff on product and service delivery;
 - f. re-assess consumer information needs;
 - g. assess the performance of after-sales service; and
 - h. give early warning about potential product and service defects.

10. COMPLAINTS REGISTERS

It is the responsibility of the designated staff who receives the complaint to enter the complaint into the Complaints Register which shall be maintained and regularly reviewed by the Head of Unit and assurance functions like Audit to ensure that complaints are appropriately managed and resolved.

The complaints register shall record the following information:

- i. Unique complaint registration number;
- ii. Gender and age of complainant;
- iii. Name of complainant;
- iv. Date complaint received;
- v. Complainant contact details;
- vi. Details of the complaint – including the product/service and the distribution channel;
- vii. Name of staff member handling complaint;
- viii. A summary of the bank's responses, including dates;
- ix. Action taken to resolve complaint;
- x. Details of any other relevant correspondence or records;
- xi. Date Resolved;
- xii. If complaint has not been resolved, reasons for failure to resolve the complainant and mechanisms to prevent future occurrences; and
- xiii. Where relevant, the current status of the complaint which has been referred to the Reserve Bank.

The records of any complaint shall be retained for no less than 5 (five) years.

11. REMEDIES FOR RESOLVING COMPLAINTS

The following are examples of possible remedies for resolving complaints:

- i. Apology;

- ii. Correcting of systems and processes;
- iii. Provision of free services;
- iv. Reduction or refund of fees paid;
- v. Compensation;
- vi. Disciplinary action against staff member;
- vii. Mediation;
- viii. Technical Assistance;
- ix. Provision of additional information to complainant;
- x. Goodwill gift or token; and
- xi. Any other assistance as required.

The Branch Manager or Customer Service Officer shall ensure that all aspects of the complaint have been followed up and addressed.

12. STAGES OF REVIEW OF COMPLAINTS

- i. The Branch Manager or Customer Service Officer shall timely review complaints within 48 hours of receipt and this will ensure that any complaints which remain unresolved receive the necessary attention.
- ii. In the event that a complainant remains dissatisfied after efforts have been made to resolve the complaint, further communication should be made in writing by the complainant with specific reasons why they remain dissatisfied. If further information comes to the attention of the complainant, irrespective of whether the matter has been reviewed, complainants are entitled to have the matter looked at again.
- iii. If the complainant remains dissatisfied following a review the complainant shall be directed to the Head of Service who may delegate an independent function to investigate and review the complaint and make submissions to the Chief Executive.
- iv. Complainant must be advised of his/her right to escalate their complaint to the Reserve Bank of Zimbabwe, any available alternative dispute resolution mechanisms or the courts if dissatisfied with the outcome of the complaints resolution process.

13. DEALING WITH ANGRY COMPLAINANTS

Employees are urged to conduct themselves in the manner below when dealing with angry complainants:

- a. Remain calm and respectful: greet the person, introduce yourself and, if possible, ask them to sit down;
- b. Use a low, calm tone of voice;
- c. Speak at a similar pace to the complainant and try to gradually slow-down that pace;
- d. Listen: do not intervene too quickly, allow the person a chance to “blow off steam”;
- e. Demonstrate openness to complainant’s view point and use active listening skills;
- f. Acknowledge the person’s anger without encouragement, diagnosis or criticism;
- g. Paraphrase and summarize what the person is saying by picking out the key points and repeating them;
- h. Agree with the person without assuming any blame, listen for things that you can agree;
- i. Don’t debate facts while the person still feels angry; and

- j. Ensure the person understand what you are saying: avoid use of technical terms which the complainant may not understand.

14. CHARGES FOR COMPLAINTS

Charges: There will be **no** charge to the complainant for complaint lodgment, investigation and resolution.