



Customer Complaints Policy

INTERNAL ONLY

Governance	
In support of the following applicable Principal Risk	Conduct Risk
Associated Key Risk (if applicable)	N/A
Approval date	30 May 2018
Last review date	4 June 2018
Next review date	4 June 2019
Location	Policy and Procedure Intranet Site > Documents > Policies

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Customer Complaints Policy

1. POLICY CONTEXT

1.1 Introduction

The Customer Complaints Policy, hereafter referred to as 'the Policy', specifies the control requirements and must be read in conjunction with the [Conduct Risk](#).

Complaints give us valuable information about how we are treating our Customers and help us continuously improve our services. How we deal with our Customers when they are dissatisfied is critical to us in achieving our desired customer experience outcomes.

Every complaint must be handled in a way that ensures we put our Customers at the centre of what we do by making sure all Complaints are positively responded to. We are committed to dealing with Complaints in a manner that complies with all laws and regulatory requirements wherever we do business, this includes handling complaints which relate to personal data in a manner which complies with data privacy legislation and regulations, as well as the [Data Privacy Policy](#) and [Data Privacy Standard](#).

Complaints are not limited to 'retail' Customers. Complaints can come from all potential, existing or former Customers, clients or counterparties. The process by which we deal with Complaints may vary across different businesses, however, we have an obligation to ensure that we treat all Complainants fairly.

This Policy is in support of the [Enterprise Risk Management Framework](#) and should be read in conjunction with any document listed in Section '[Related documentation supporting this Policy](#)'.

1.2 Purpose

The primary objective of the Policy is to:

- Provide control requirements relevant to the control objectives and corresponding minimum requirements.

1.3 Scope

1.3.1 In Scope

This policy applies to:

- (a) Absa Group Limited (AGL) and all its subsidiaries (including any consolidated entity acquired via a debt-for-equity swap or created through a joint venture); and
- (b) All employees and workers of any entity within paragraph above; for the purposes of this document, "employees" includes permanent employees and fixed term employees; "workers" includes contingency workers (also referred to as agency workers) and secondees to AGL from a third party, irrespective of their location, function, and grade or standing. (Consultants and managed services workers engaged under a master services agreement with a third party is not in scope for this policy as the Beam control requirements will apply. The only exception is if a consultant is seconded to AGL).
- (c) This policy is specifically important to (add Business Area name), if applicable.

1.3.2 Out of Scope

This policy does **not** apply to:

- Any entity in which AGL has any interest and which is a non-consolidated entity, or to any employee of any such entity; or
- Any entity which has been consolidated for International Financial Reporting Standards (IFRS) accounting purposes*, provided AGL has neither legal nor operational control.
 - By agreement between the Policy Owner and the AGL Accountable Executive / Relationship Manager for a non-consolidated entity, specific control requirements incorporated within this Policy may be applied to the non-consolidated entity. In such cases, obtaining the agreement of the non-consolidated entity concerned or its other owner(s) to the control requirement(s) and the monitoring / oversight of the effective operation of the related controls, will be the responsibility of the relevant Accountable Executive / Relationship Manager."

- ** such entities are likely to be special purpose vehicles (SPV) with a related AGL loan which is in default and where AGL has current and unilateral enforcement rights but does not have legal ownership / control.*

2. POLICY PROVISIONS / CONTROL REQUIREMENTS

2.1 Control Requirements

Businesses must establish and maintain appropriate measures to manage the risks set out in the Conduct Risk Management Framework in conformance with the requirements set out in this Policy and Standard. This includes (but is not limited to):

- *establish, enhance and maintain Controls set out in Business Standards or Business Procedures (as relevant) that implement the Mandatory Minimum Controls set out in this document as well as any relevant Business Mandatory Minimum Controls; and*
- *monitor the effectiveness of Controls within their Business and detect and escalate Control failures including potential Detriment and non-compliance with relevant Control;*
- *undertake remedial action in a timely manner, or as directed by third parties such as Absa' auditors or regulators, where potential Detriment or weaknesses in the control framework are identified.*
- *provide periodic attestations and maintain accurate books and records in adherence with any relevant Controls;*
- *ensure that Employees receive appropriate training with a view to understanding and managing any relevant risks within the context of the Controls applicable to their Business.*

2.1.1 Control Objectives, Corresponding Minimum Requirements and Responsibilities

Control Objective Ref	Standard Control Ref	Corresponding Minimum Requirements	Responsibility
1		Customers are provided with clear, consistent, readily available information on how to raise a Complaint.	
	1.1	Clear instructions must be published through all Absa customer interaction channels to confirm that complaints can be received by letter, telephone, face-to-face, fax, email, digital platforms, approved social media platforms and secure messaging and instructions on how to do so.	Entity
	1.2	Where a customer is not readily identifiable from contact on Absa owned websites, we will obtain more information from the customer to enable referral.	Entity
	1.3	Complaints leaflet must be available in English and any other official language as required by legislation.	Entity
2.		The process for raising a Complaint is accessible, transparent and simple to use.	
3.		Customers are not charged for raising a Complaint. <i>To ensure that there are no financial barriers for our customers to making a complaint, by enabling complaints to be made free of charge and keeping costs involved in making the complaint to a minimum.</i>	
	3.1	No charges are levied by the bank or third parties acting on behalf of the bank against the client for raising a complaint.	Entity
	3.2	Customers are informed of the most cost efficient contact numbers available e.g. toll free numbers, cellular phone numbers or "basic rate" telephone numbers for raising a complaint.	Entity

Control Objective Ref	Standard Control Ref	Corresponding Minimum Requirements	Responsibility
	3.3	Any potential costs to be incurred while raising a complaint must be visible to all customers/potential customers of the bank. The client will be informed of cost, if any, raised by any regulator, independent adjudicator or Ombud for submitting complaint for arbitration.	Entity
4.	Customer Feedback Mechanisms provide clear information on the appropriate process for raising a Complaint.		
	4.1	Our customer feedback capturing mechanisms make it clear that the process is for gathering feedback only and clearly signpost customers to our complaints process for the purpose of raising a complaint.	Entity
	4.2	Where there is an indication a customer is not satisfied with the overall service received, as best practice a review of the response should be undertaken to identify any potential complaints that need further review or action.	Entity
5.	Complaints are promptly acknowledged.		
	5.1	All complaints are acknowledged within a maximum of one (1) working day of receipt if we have not been able to provide a resolution prior to this.	Entity
	5.2	As a minimum, acknowledgements of complaints must be in writing, sent through a secure channel of the customer's choice.	Entity
	5.3	Where we are not able to use the customer's channel of choice and/or switch channel of communication we should explain the reasons.	Entity
6.	We will record all expressions of dissatisfaction		
	6.1	Complaints are recorded in a manner appropriate to the nature, scale and complexity of the Business and type of Complainant.	Entity
	6.2	We will record expressions of dissatisfaction raised by customers and non-customers of Absa.	Entity
	6.3	Complaints and customer concerns records will be accurately updated and maintained, throughout the lifetime of the complaint, to provide a complete record of progress.	Entity
	6.4	Remedial actions required to resolve the complaint or address the customer concerns to the satisfaction of the customer will be recorded with sufficient detail to monitor completion of such actions.	Entity
	6.5	All information, in whatever format, relating to each complaint or customer concern will be retained in line with regulatory requirements and Records Management Policy .	Entity
7	Complaints are fairly and thoroughly investigated, documented and resolved in a timely manner appropriate to the nature, scale and complexity of the Business and type of Complainant.		
	7.1	Assessment of customer complaints as minimum need to follow the following steps: <ul style="list-style-type: none"> • Understanding the issue • Gathering evidence and information to make a decision • Assessment and Investigation • Making a decision 	Entity

Control Objective Ref	Standard Control Ref	Corresponding Minimum Requirements	Responsibility
		<ul style="list-style-type: none"> Recording the decision and rationale. 	
	7.2	<p>Timelines</p> <ul style="list-style-type: none"> We will aim to resolve all expressions of dissatisfaction at First Point of Contact (FPOC). If we are unable to resolve at FPOC, we will escalate or refer as soon as possible with minimal avoidable delays. We will aim to resolve all formal complaints within three (3) days to eight (8) weeks of receipt based on the nature, scale and complexity of the complaint- Except if Local regulatory requirement and process drives different result. We will provide the customer with update at regular intervals – (if not otherwise agreed then every third working day until resolved). Business is required to document the reasonable resolution period for the common categories of complaints within the area. 	Entity
	7.3	<p>Multiple complaint points</p> <ul style="list-style-type: none"> Where a complaint has multiple complaint issues, we will, wherever possible, treat this as a single complaint from both the customer perspective and for recording purposes. We will record multiple issue complaints using the category which we consider forms the main part of the complaint. We will, wherever possible, assign the case to the area responsible for dealing with the main part of the complaint for investigation of the whole complaint, including customer concerns. We will, wherever possible, send a single response to the customer covering the outcomes on all the complaint points, including customer concerns. 	Entity
	7.4	<p>Escalating a complaint</p> <ul style="list-style-type: none"> A complaint will be escalated to a team manager or dedicated complaints team for review and investigation where: <ul style="list-style-type: none"> action agreed with the customer cannot be completed in the timescales for informally resolving the complaint we are unable to contact the customer to discuss the complaint and gain agreement on resolution the customer does not accept the resolution being offered the investigation is not completed in the timescales for informally resolving the complaint. A customer concern will be escalated to a team manager or dedicated complaints team for review and investigation where: <ul style="list-style-type: none"> The customer does not accept the apology or explanation provided at FPOC. The customer accepts the apology or explanation at FPOC but requests confirmation in writing. 	Entity

Control Objective Ref	Standard Control Ref	Corresponding Minimum Requirements	Responsibility
	7.5	<p>Closing a complaint</p> <ul style="list-style-type: none"> • We will treat a complaint as closed where: <ul style="list-style-type: none"> - the customer has accepted the resolution proposed at FPOC, or within the informal resolution period; or - the customer has withdrawn their complaint; or - a Final Response Letter has been issued. • We will treat a customer concern as closed where: <ul style="list-style-type: none"> - the customer has accepted the resolution/explanation. This can be expressly stated or implied where we write to the customer and they do not respond; or - the customer has withdrawn their concern. 	Entity
	7.6	<p>Reopens a complaint</p> <ul style="list-style-type: none"> • A complaint will be reopened where the customer has challenged the outcome or redress payment paid and we need to reassess the initial decision or actions agreed. • Where a complaint was resolved at FPOC and the customer contacts us again, colleagues should treat this as a “Reopen with no status change (not requiring a Final Response) where: <ul style="list-style-type: none"> - Customer contact is within five (5) working days of the initial resolution and; - The reason for the call (or request for reopen) is Redress not paid/paid incorrectly and/or Actions not completed and; - Customer is not requesting anything more than the initial resolution. <p>Where a case is reopened we will review and investigate the complaint using the same process and with the same skill and diligence as a new complaint, keeping our customer regularly informed of the progress on the case.</p>	Entity
	7.7	<p>Complaints from Third Parties</p> <ul style="list-style-type: none"> • There are times when a customer has authorised another individual or a company to act on their behalf. You must not register the complaint or discuss with a third party unless: <ul style="list-style-type: none"> - The customer’s authority has been provided in writing. - Identification and verification has been obtained for the third party using local business Identification and Verification (IDV) processes. <p>Once we are satisfied with the authority and the identity of the third party the complaint will be logged in the customer’s name and the third party details recorded.</p>	Entity
	7.8	<p>Time Bar</p> <ul style="list-style-type: none"> • We are able to time bar complaints, provided certain criteria are met. • To time bar a complaint a customer must complain outside a period that is either: <ol style="list-style-type: none"> a) Five (5) years from the date on which the cause of action occurred; b) Three (3) years from the date on which the complainant became aware (or ought reasonably to have been aware) 	Entity

Control Objective Ref	Standard Control Ref	Corresponding Minimum Requirements	Responsibility
		<p>that they had cause for complaint, whichever is the longer. When applying time bar, consideration must be given to the circumstances of the customer to determine whether there were any exceptional reasons as to why they are bringing their complaint outside the time limits. Time bar should not be applied where exceptional circumstances exist.</p>	
	7.9	<p>Remedial action is undertaken in a timely manner, and in accordance with relevant Business Mandatory Minimum Controls, or as directed by third parties such as AGL' auditors or AGL Regulators. Confirmation of completed remedial actions should be included in management information.</p>	Entity
8.		<p>Complaints Investigations are conducted by individuals who:</p> <ul style="list-style-type: none"> • Are empowered to recognise and investigate Complaints effectively; and • Have the relevant skills, knowledge and expertise in the relevant aspect of the Business to which the Complaint relates. 	
9.		<p>If there is a Conflict of Interest between the individual conducting the Complaints Investigation and the subject of the Complaint, it is escalated to a Business Senior Manager who is responsible for determining an appropriate course of action.</p>	
10.		<p>Customers are kept informed of the progress of the Complaints Investigation, where permitted, by any relevant Business Mandatory Minimum Controls.</p>	
11.		<p>Customers are provided with a timely, clear, fair, unbiased and robust response to Complaints, addressing all material elements raised by the Complainant.</p>	
12.		<p>When a Complaints Investigation has been concluded, appropriate remedial action and/or appropriate redress are offered to Customers.</p>	
	12.1	<p>Assessment of redress</p> <ul style="list-style-type: none"> • For customer concerns: only gestures of goodwill will be appropriate. All other forms of redress will not apply • For complaints, all redress types may be applicable, whether the complaint is upheld or not upheld • When considering any form of redress we will consider a number of factors, including, but not limited to: <ul style="list-style-type: none"> - the customer's individual circumstances - the customer's underlying or perceived problem - the wishes and needs of the customer - how effectively we have handled the complaint - the seriousness of the bank's error or omission, - the impact of our actions on the customer • Redress will vary depending on the nature of the failure and the impact it had on the customer <p>We will not offset redress payments against any existing debts owed to the bank without the customer's agreement</p>	Entity
	12.2	<p>Refunds & Compensatory Interest</p> <ul style="list-style-type: none"> • Where actual financial loss is established due to bank error or omission, we will provide a full refund and reimburse the actual amount of the loss (subject to netting rules where applicable) 	Entity

Control Objective Ref	Standard Control Ref	Corresponding Minimum Requirements	Responsibility
		<ul style="list-style-type: none"> • Where a refund is provided we will compensate for loss of funds (Compensatory Interest), and will pay interest as appropriate <p>Redress should be calculated as at the expected payment date</p>	
	12.3	<p>Distress & Inconvenience (D&I) payments</p> <ul style="list-style-type: none"> • Where we decide that a payment of D&I is appropriate, we will assess the amount based on the customer circumstances and impact of the bank's errors or omissions. Considerations include (but are not limited to): <ul style="list-style-type: none"> - Unnecessary delays in complaint handling - Additional steps or effort that the customer was required to take - Reliance on inaccurate information - Upset caused by our actions or behaviours • When considering payments of D&I on non-personal accounts (e.g. to Companies or Trusts), the following principles will apply: <ul style="list-style-type: none"> - Payments for distress to a non-personal account will not be applicable as an entity cannot experience pain or suffering. - Payments for inconvenience on a non-personal account will be paid directly to that account - If the individual raising the complaint on behalf of the non-personal account claims that our actions have had a personal impact (e.g. they claim a member of staff was rude) we will treat that individual as a non-customer, and consider a D&I payment in their individual capacity • Where multiple payments of D&I have been made to a customer/client on a single account, we will consider the holistic position and review the customer journey as a whole, before making further payments. This will enable us to fully assess the impact of our errors or omissions and also to identify any abuse of the redress standards. Consideration of D&I payments will be noted in the Complaints Recording systems 	Entity
	12.4	<p>Payment of Gesture of Goodwill (GOGW)</p> <ul style="list-style-type: none"> • GOGW payments are discretionary and are made without acceptance of liability by the bank. • We can consider a GOGW where there is no bank error but a payment can be justified to maintain customer confidence or to generate goodwill. • We can make a financial GOGW to reimburse costs (e.g. charges or fees) incurred by a customer, where no similar costs have been incurred, and no complaints, claims or payments for the same costs have been made, in the previous 12 months. • We can consider non-financial GOGW where a non-financial gift is deemed to be more appropriate based on customer circumstances. 	Entity

Control Objective Ref	Standard Control Ref	Corresponding Minimum Requirements	Responsibility
	12.5	<p>Communication and acceptance of Redress</p> <ul style="list-style-type: none"> • Customer acceptance of refunds, compensatory interest, non-Absa charges and refund of insurance premiums are not required before payment as they are reimbursing customers for actual loss. • Where possible, customer acceptance should be obtained before making payments for D&I and GOGW: <ul style="list-style-type: none"> - We are expected to make reasonable attempts to contact the customer to obtain acceptance <p>Where acceptance cannot be obtained, we must record the offer, customer contact attempts and/or reasons for customer not accepting the offer.</p>	Entity
	12.6	<p>Recording of Redress</p> <ul style="list-style-type: none"> • We will record all payments of Redress in our complaint system, using the correct categorisation based on the definitions detailed above. • We will clearly document our rationale for either paying or not paying Redress on the complaint system, to demonstrate consideration and assessment. 	Entity
13.	If the outcome of a Complaints Investigation is not resolved to the satisfaction of the Customer, clear information is provided on any relevant internal and external escalation process.		
	13.1	Where a satisfactory response cannot be agreed on a customer concern with the customer, we will review the circumstances to determine whether the expression of dissatisfaction should be re-categorised as a complaint. If not, we can escalate the issue internally for further review; however there will be no external escalation process.	Entity
	13.2	For all resolved complaints, from the 30 June 2016, we will send a Summary Resolution Communication in writing to our customers asking them to come back to us with any issues and confirming their right to refer the complaint to the /Relevant Ombuds or Regulatory scheme should they wish to do so.	Entity
	13.3	Where a satisfactory response cannot be agreed on a formal complaint, the customer must be advised of our reasons within the Final Response Letter.	Entity
	13.4	The Ombudsman will now require our consent to consider a complaint from an eligible customer, prior to it being fully investigated by AGL within eight (8) weeks. The Ombudsman can only investigate that complaint if we consent to them doing so Except if Local regulatory prescribes a different result.	Entity
	13.5	The Ombudsman will now consider a complaint from an eligible customer that we have time-barred (i.e. declined to investigate as being outside of the six (6) / three (3) year time limits). The Ombudsman can however still review our decision to time-bar without consent. The Ombudsman can also, with our consent, consider a complaint referred to them outside six (6) months of our final decision. When there are exceptional circumstances which have delayed the referral to the Ombudsman by the customer, the Ombudsman can consider the case without our consent.	Entity

Control Objective Ref	Standard Control Ref	Corresponding Minimum Requirements	Responsibility
14.		<p>A regular review of management information is undertaken including appropriate escalation of issues identified relating to Complaints and Complaints Investigations designed to:</p> <ul style="list-style-type: none"> • Identify emerging risks; • Perform root-cause analysis; and • Identify and resolve any recurring or systemic issues <p>To ensure we proactively learn from complaints and use feedback and data for service improvements and conduct risk management.</p>	
	14.1	<p>Monthly Management Information (MI) will be produced that encompasses all agreed key metrics and enables comparative discussion at the AGL Complaints Forums and Executive Committees</p> <ul style="list-style-type: none"> • Annually review their website information to ensure that the process and contact details are up to date and remain fully accessible. • Annually review literature on how to make a complaint to ensure it remains compliant and relevant. • Ensure that identification and handling of customers in vulnerable circumstances is monitored through assurance processes. • Monitor feedback mechanisms to ensure appropriate signposting of complaints. • Each business area will produce evidence against these controls on a periodic basis and the data will be reviewed by senior management at local and group management forums. 	Entity
	14.2	<ul style="list-style-type: none"> • Review any new telephone lines to ensure they meet this standard. • Keep abreast of any changes to telephone call rates outside our control, to assess impact, update any cost of call information and communicate change to our customers. • Each business will report adherence to this Standard annually to the Complaints Policy & Standards Forum. 	Entity
	14.3	<ul style="list-style-type: none"> • Timeliness of acknowledgements. • Minimum content and quality of acknowledgements. • Each business area will produce MI against these controls on a regular basis and the data will be reviewed by senior management at local and group management forums with the intention to adhere to the desired standard. • Assess accurate identification and timely recording of complaints. • Assess accurate identification and timely recording of customer concerns. • Monitor corrections to recording required as a result of assurance activity (where appropriate). • Each business area will produce MI against these controls on a regular basis and the data will be reviewed by senior management at local and group management forums. 	Entity

Control Objective Ref	Standard Control Ref	Corresponding Minimum Requirements	Responsibility
	14.4	<ul style="list-style-type: none"> • Ensure and evidence that our investigation process delivers fair and appropriate outcomes for both customer and the bank. • To monitor reopens and Ombudsman referrals. • To monitor fulfilment of corrective action agreed with the customer. • Assess conformance to investigation time frames. • Each business area will produce MI against these controls on a regular basis and the data will be reviewed by senior management at local and group management forums. 	Entity
	14.5	<ul style="list-style-type: none"> • monitor individual performance and quality. • monitor successful completion of annual accreditation. • report completion rates to Senior Management. • revisit and reassess complaint handling training material on an annual basis. • Each business area will produce MI against these controls on a periodic basis and the data will be reviewed by senior management at local and group management forums. 	Entity
	14.6	<ul style="list-style-type: none"> • Ensure staff receive training on how to deal with conflicts of interest and confirm awareness of Absa Code of Conduct. • Each business area will produce MI against these controls on a regular basis and the data will be reviewed by senior management at local and group management forums. 	Entity
	14.7	<p>Assess:</p> <ul style="list-style-type: none"> • Timeliness of updates. • Minimum content of updates. • For allocated complaints, quality of the update. • Each business area will produce MI against these controls on a regular basis and the data will be reviewed by senior management at local and group management forums. 	Entity
	14.8	<ul style="list-style-type: none"> • Assess the quality and content of the communicated outcomes. • Monitor compliance with regulatory requirements regarding communication of Ombudsman rights. • Each business area will produce MI against these controls on a regular basis and the data will be reviewed by senior management at local and group management forums. 	Entity
	14.9	<ul style="list-style-type: none"> • Assess remediation action and redress considered on complaints. • Monitor fulfilment of actions within agreed time frames. • Monitor payments of redress for upheld and not upheld complaints and customer concerns to ensure appropriate redress is made to reflect the Bank error, loss, upset and disruption caused. • Each business area will produce MI against these controls on a regular basis and the data will be reviewed by senior management at local and group management forums. 	Entity

Control Objective Ref	Standard Control Ref	Corresponding Minimum Requirements	Responsibility
	14.10	<ul style="list-style-type: none"> • Each business area will define limits of authority (empowerment limits) detailing the sign-off levels required for different levels of Redress. These limits of authority will be shared with all complaint handling colleagues and will also be available on the complaints system. • Each business area will have appropriate controls in place to: <ul style="list-style-type: none"> - Monitor the amount of Redress paid against each category defined above. - Monitor the amount of Redress paid for upheld complaints and not upheld complaints. - Assess the quality of categorisation and assessment of Redress. - Assess the quality of recording Redress decisions and rationale. - Assess the adherence to limits of authority - Confirm that employees are trained and competent in the application of redress. • Each business area will produce MI against these controls on a regular basis and a summary of performance will be reviewed by senior management at local and group level management forums. 	Entity
	14.11	<ul style="list-style-type: none"> • Each business will have appropriate controls in place to annually review the content of the Summary Resolution Communication, Final Response Letter, eight week and acknowledgement letter templates to ensure they continue to meet the minimum requirements. (Except if Published Templates are available – then business should align effort or utilised Published). • Each business area will produce MI against these controls on a regular basis and the data will be reviewed by senior management at local and group management forums. 	Entity
	14.12	<ul style="list-style-type: none"> • The key complaints metric configuration process will ensure alignment of MI output across AGL. • The Group MI Reporting Forum and Exceptions Reporting Forum will perform initial reviews of Complaints Management Information and recommend changes and actions for escalation to the Senior Complaints Forum. • All meetings where Management Information and Root Cause Analysis is reviewed and discussed will have Terms of Reference (reviewed minimum annually) and Minutes that will ensure that agreed actions are noted and tracked to completion. • Compliance, Operational Risk and Absa Internal Audit (AIA) will be represented at meetings or have access to the information produced, as required, to ensure the “second line of defence” are aware of current performance and issues. 	Entity

3. POLICY GOVERNANCE

3.1 Roles and responsibilities

Key roles and responsibilities to achieve the Policy requirements:

ROLE	RESPONSIBILITY
Entity	Implement all Minimum AGL Standard Controls and where relevant agree with Policy Owner on Business Standard.
Policy Owner	Implement the requirements of the Policy and Standard where available.
Business Standards Owner	<ul style="list-style-type: none"> Collaborate with the Policy Owner on the design of the requirements in this Policy to ensure that these can be implemented at a Business level. Collaborate with the Policy Owner and other Standards Owners to design fit for purpose Standards to implement the requirements of this Policy at Business level, for approval by the Policy Owner.

3.2 Adherence

The provisions / control requirements of this policy are mandatory and are used to implement a group-wide approach for managing Conduct Risk in support of the [Enterprise Risk Management Framework](#). Any deviations from these provisions / control requirements must be escalated per the requirements stipulated in the [Management of Dispensations, Waivers and Breaches Standard](#).

Non-adherence to any requirement in this policy may result in disciplinary action, which could lead to dismissal.

3.3 Reputational Impact

Any action or inaction taken relevant to this policy which may have potential to incur reputation risk for AGL, i.e. likely to result in material criticism and/or censure of AGL by key stakeholders or opinion formers (including clients, market counterparties, regulators, government officials, law enforcement agencies, media or Non Government Organisation (NGOs)) should be escalated to the appropriate Reputation Risk Review Committee in accordance with [Reputation Risk](#).

4. REFERENCES

4.1 Related documentation supporting this Policy

The following documents must be referred to during the execution of this Policy:

- [Management of Dispensations, Waivers and Breaches Standard](#).
- [Conduct Risk](#)
- [Enterprise Risk Management Framework](#)
- [Reputation Risk](#)
- [Data Privacy Policy](#)
- [Data Privacy Standard](#)
- [Records Management Policy](#)

4.2 Glossary

This glossary provides acronyms and definitions that are specific to the content of this document:

4.2.1 Abbreviations / Acronyms / Terms

Abbreviation / Acronym / Term	Explanation
AGL	Absa Group Limited

Abbreviation / Acronym / Term	Explanation
AIA	Absa Internal Audit
D&I	Distress & Inconvenience
FPOC	First Point of Contact
GOGW	Gesture of Goodwill
IDV	Identification and Verification
IFRS	International Financial Reporting Standards
MI	Management Information
NGO	Non Government Organisation
SPV	Special Purpose Vehicles

4.2.2 Definitions

Definition	Explanation
Complaint	<ul style="list-style-type: none"> Any expression of dissatisfaction, whether justified or not, about Absa financial services or products where the customer believes that they have been, or potentially could be, caused; a financial loss, or; upset or disruption which cannot be resolved by a simple apology or explanation
Complaints Investigation(s)	A thorough investigation of any Complaint raised by a Customer to ensure that all raised issues are properly identified, understood and addressed. The investigation should undertake appropriate enquiries and gather sufficient information to make a judgement on the validity of the Customer's Complaint and what steps will be required for its resolution.
Compliance	Compliance (2nd Line of Defence) sub-function responsible for oversight of a Business.
Conduct Risk	The risk that detriment is caused to our customers, clients, counterparties or Absa because of inappropriate judgement in the execution of our business activities.
Conduct Risk Appetite	The level of risk that Absa is prepared to accept whilst pursuing its strategy as articulated in the Principal Risk Framework and Associated Framework.
Conflict of Interest	A Conflict of Interest arises where there is a risk that the professional judgement or actions of the person investigating the complaint may be unduly influenced by a personal interest that could result in a possible disadvantage or loss to the customer. Personal interest can include financial gain, desire for professional advancement or wish to do a favour for family or friends
Control Objective(s)	An element of the control framework aimed at mitigating an identified risk or some aspect of an identified risk that sets out a high level objective against which Business is able to map the Controls that exist, or that are required, to mitigate the risk at an operational Business level.
Control(s)	<p>A control is a specific action designed to mitigate risk within an activity or process. Controls may be manual or automated and may operate in isolation or in conjunction with other controls. The design of a control can either be "detective" or "preventative":</p> <ul style="list-style-type: none"> a "detective control" is designed to identify and trigger a response to a risk issue that has occurred, whereas

Definition	Explanation
	<ul style="list-style-type: none"> a “preventative control” is designed to stop a risk issue arising.
Customer Concerns	<ul style="list-style-type: none"> Any expression of dissatisfaction: stating upset or disruption that can be resolved by way of apology and explanation, or; which doesn’t relate to a Absa financial service or product
Customer Feedback Mechanism:	A proactive method for obtaining Customer feedback supported by Absa. This is inclusive of mandated Absa customer care lines, employees and social media platforms
Customer(s)	Any existing and potential customers, clients and counterparties
Detriment	Anything that may cause damage, harm or loss to Customers, the markets in which Absa operates or Absa.
Distress & Inconvenience (D&I)	Financial payment made to recognise the trouble, upset or embarrassment caused by the bank’s error or omission Examples include payments for delays in resolving a complaint or time spent to put things right
Employee	All employees and workers of any entity within Absa; for the purposes of this document, "employees" includes permanent employees and fixed term employees; “workers” include contingency workers (also referred to as agency workers) and secondees to Absa from a third party, irrespective of their location, function, grade or standing. (Consultants and managed services workers engaged under a master services agreement with a third party are not in scope for this Policy as the External Supplier Control Requirements (BEAM) will apply. The only exception is if a consultant is seconded to Absa).
Enterprise Risk Management Framework	A document that sets out the activity, tools, techniques and organisational requirements to ensure that all material risks facing Absa are identified and understood, and the appropriate responses are in place to protect Absa and prevent detriment to its Customers, colleagues or community, enabling Absa to meet its goals, and enhance its ability to respond to new opportunities.
First Day Resolution	A complaint that has been resolved within twenty four hour of being lodged by a customer
First Point of Contact	A complaint that has been resolved without referral during an interaction with a customer where it was lodged
Gesture of Goodwill (GOGW)	Financial or non-financial payment (Simply Thank you) can be made where no bank error has occurred, as a one-off exception to maintain customer confidence or to generate goodwill
Key Metrics	Include:- Complaint Volumes, 8+weeks stock, resolution rates within key timescales, uphold rates, average redress, reopened complaints (operational and customer challenge), Ombudsman referral and overturn rates, Breaches of Acknowledgement, Quality Assurance scores and trends, outcome of Root Cause Analysis and any other data considered to be key to understanding Complaints Handling performance
Material Impact	Material Impact” is where the customer is alleging they have or may suffer financial loss, or have been caused upset or disruption which cannot be resolved by way of apology or explanation only
Multiple Complaint Points	Some complaints may be complex and/or have a number of secondary related or unrelated issues. Such complaints can relate to just one business unit or can relate to a number of business units.

Definition	Explanation
Non-Absa Charges (Compensation)	Financial payment made to cover expenses for third party charges incurred as a direct result of the bank's error/omission
Policy	A Policy mandates the high level principles / control objectives to address a specific risk or set of risks deemed material to Absa.
Principal Risk Framework Key Risk Control Framework(s)	A Framework which describes the high level Group-wide approach for a specific risk or set of risks. Group-wide frameworks are approved by the relevant Board and Policies are typically aligned to one of the relevant Board-approved frameworks.
Redress in the Event of a Crisis Policy	Which requires that a proactive approach is taken during a Crisis in relation to provision of information to customers and mitigating customer detriment.
Refund	Financial payment made to reimburse actual financial loss caused by the bank's error/omission Examples include: reimbursement of incorrectly charged charges, fees, or interest
Refund of Insurance Premiums taken in error	This option will only be used for repayments or refunds of Insurance premiums which have been taken in error
Standard(s)	A document, as described in the Enterprise Risk Management Framework that defines how mandatory minimum control requirements are applied, either on an Group-wide basis or by a Business or Function, in support of a Policy, that reflects the span and diversity of business activities and operating environments across Absa, and the regions, jurisdictions and regulatory environments in which it operates.
Time Bar	Time bar is the use of time limits within which customers must make a complaint and/or claim for compensation. The requirements may vary depending on jurisdictions and the higher of local requirements must be adhered to.

5. RECORD OF VERSION CONTROL / UPDATES

Date	Author / Source	Change
4 June 2018	Email received from; Nqabakazi Madalane (Policy Contact) Circular Date: 4 June 2018 Circular number: 401/2018	Annual Review. <ul style="list-style-type: none"> • Amendment of 13.2 to remove the informally (and eligible) complaints requirement. Inclusion of the following references: • Policy: Barclays Africa Group Limited - Data Privacy Policy The Policy and Standard document has been merged to form one document – the Policy.