Client Complaints Handling Policy & Procedures
# Client Complaints Handling Policy and Procedures

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## Version History

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1. Introduction

GBCORP takes disputes with and complaints from all clients very seriously. Disputes and complaints are usually evidence of a breakdown in relationships and therefore timely and appropriate action is essential if good relations are to be restored. If not settled quickly they can both tarnish GBCORP’s reputation and, in more serious cases, could result in time consuming and costly litigation and potential censure by the regulatory authorities.

All GBCORP employees should familiarise themselves with the procedures set out below and adhere to them. In order to assist in this regard, the policy and procedures manual will be incorporated into the induction training for all new staff and also made accessible to all staff.

In relation to redress, GBCORP will endeavour to return the customer to a position where they are financially no worst off than they would have been had the error (which lead to the complaint) not occurred.

For further information and guidance on client complaints handling, GBCORP staff should refer to CBB customer Complaints Procedures for Banks, and the bank’s internal guidelines “ownership of CRM Function” (see attached).

2. Applicability

This policy applies to all activities undertaken by GBCORP and to all staff. Client complaints procedures must be documented appropriately and clients must be informed of their availability.

3. Responsibility

GBCORP must appoint a client Complaints Officer and publicise his / her contact details to all departments. The client complains officer must be of senior level at the bank and must be independent of the parties to the complaint to minimize any potential conflict of interest.
4. Receiving Complaints

It is of vital importance that GBCORP understands the exact nature of any complaint and therefore all complaints should be received in writing (via post, fax or email). In instances where a complaint is received via the telephone, staff should write down the relevant details exactly as provided by the complainant and forward it to the Complaints Officer (for investigation) and the Complainant (in order to ensure the complaint has been accurately captured).

There is often a fine line between a customer providing feedback on how GBCORP might improve its service / products, and a customer making a complaint. Thus, GBCORP staff should always err on the side of caution and invite the customer to make a complaint if they so wish. If a customer contacting the bank believes they have a legitimate complaint then they should be encouraged to make it (regardless of whether you personally think it is a legitimate complaint or not).

All complaints should be referred to the Complaints Officer immediately.

5. Dealing with Complaints

GBCORP staff must provide the Complaints Officer with all assistance requested in order to allow for a full investigation to be made in a timely manner.

Upon receiving a request, the Complaints Officer will make an initial assessment as to the gravity of the complaint (minor, medium or major).

Complaints graded as being of minor severity. Such complaints (e.g. minor mechanical or clerical errors) are unlikely to require much investigation and therefore would be expected to be resolved within 5 working days. If after 5 working days the complaint remains unresolved, than a holding letter / email should be sent to the customer noting receipt of the complaint and outlining when GBCORP expects to be in a position to formally respond. Minor complaints may be referred on by the Complaints Officer to an appropriate manager (although not one who was directly involved in the matter which is the subject of the complaint). However, in such cases the responsibility for determining GBCORP’s response remains with the Complaints Officer. For minor complaints GBCORP’s formal response to the customer may be made orally unless financial redress is being made in which case a written response is always required.

Once the complaint has been satisfactorily resolved, the Complaints Officer and the relevant business unit will work to identify and remedy any specific or systemic problems identified by the complaint.

Complaints graded as being of medium severity. Such complaints (e.g. those deemed potentially as being equal to a risk classified as being of moderate impact under the R&CSA process) are likely to require investigation and therefore would not normally be expected to be resolved within five working days. If then after Five working days the complaint remains unresolved, a holding letter should be sent to the customer noting receipt of the complaint and outlining when GBCORP expects to formally respond. If the complaint remains unresolved after four weeks (from receipt of the original complaint), a written update should be provided outlining when GBCORP expects to be in a position to formally respond. Further updates should be provided every four weeks thereafter until resolution.
Medium complaints will be dealt with by the Complaints Officer in consultation with management from relevant business units. Once the Complaints Officer has completed their investigations he / she will respond to the customer in writing outlining their findings and any further action GBCORP proposes to take. The Complaints Officer will discuss the proposed response (including the nature of any redress to be offered) with the Executive Director of the relevant business unit, but the responsibility for determining GBCORP’s response ultimately remains with the Complaints Officer.

Once the complaint has been satisfactorily resolved, the Complaints Officer and the relevant business unit will work to identify and remedy any specific or systemic problems identified by the complaint.

Complaints graded as being of major severity. Such complaints (e.g. those deemed potentially as being equal to a risk classified as being of major or catastrophic impact under the R&CSA process) are likely to require substantial investigation and therefore would not normally be expected to be resolved within five working days. If then after five working days the complaint remains unresolved, a holding letter should be sent to the customer noting receipt of the complaint and outlining when GBCORP expects to formally respond. If the complaint remains unresolved after four weeks (from receipt of the original complaint), a written update should be provided outlining when GBCORP expects to be in a position to formally respond. Further updates should be provided every four weeks thereafter until resolution.

Major complaints will be dealt with by the Complaints Officer in consultation with senior management as applicable. Once the Complaints Officer has completed their investigations he / she will respond to the customer in writing outlining their findings and any further action GBCORP proposes to take (including the nature of any redress to be offered).

Once the complaint has been satisfactorily resolved, the Complaints Officer and the relevant business unit will work to identify and remedy any specific or systemic problems identified by the complaint.

6. Authority to settle Complaints

Whilst the Complaints Officer will discuss the proposed response to a complaint (including the nature of any redress to be offered), with relevant management, the responsibility for determining GBCORP’s response remains with the Complaints Officer. In the event there is an irreconcilable difference of opinion between the Complaints Officer and the business unit the matter will be referred to the CEO for resolution in the case in complaints graded minor & medium and the Audit Committee in the case of complaints graded as major.

7. Escalation of Complaints

a) When responding to a complaint the Complaints Officer will clearly outline the findings of his / her investigation and what further action GBCORP is proposing to take. The Complaints Officer must also make sure that the complainant is aware that should they remain dissatisfied with GBCORP’s response, the next level of escalation is to the CEO, in the case in complaints
graded minor & medium, and the Audit Committee in the case of complaints graded major.

b) In the event that the client remain dissatisfied with the bank response. The bank must outline the options that are open to that client to pursue the matter further, including, where appropriate, referring the matter to the Compliance Directorate at the CBB.

8. Record Keeping Requirements

The Compliance Department will keep records of all complaints for at least Ten years from when it is received.

In particular, the following must be maintained:

(A) Identity of the complainant;

(B) Substance of the complaint;

(C) Name of the Employee who investigated the complaint;

(D) Any correspondence between the Bank and the complainant, including details of any redress offered by GBCORP; and

(E) If applicable, the steps the Bank has taken to remedy a recurring or systemic problem.

The Complaints Officer shall circulate a summary report of complaints received and the status of the same to the CEO and Compliance Committee on a monthly basis and to the Board of Directors on a quarterly basis.

9. Review of Policy

The policy shall be reviewed by the Complaints Officer on a periodic basis (at least once a year) and amended if necessary.

10. Reporting of Complaints

GBCORP should submit to the Central Bank of Bahrain (CBB) a quarterly report summarizing the following:

   a) Number of complaints received.
   b) Substance of the complaints
   c) Number of days it took the bank to acknowledge and respond to the complaints; and
   d) Status of the complaint, including whether resolved or not, and whether redress was provided.
11. Regulatory Monitoring and Enforcement

GBCORP should make sure the compliance with these requirements is subject to the on-going supervision of the CBB as well as being part of any CBB inspection of the bank.

Failure to comply with these requirements is subject to regulatory enforcement measures