

Memo

To Board of Directors
Through Board Risk Management Committee
From Service Quality
Date April 8, 2021

Subject: Approval for HBL Mauritius Complaint Handling Policy

Purpose

The purpose of this memo is to seek approval for the HBL Mauritius Complaint Handling Policy.

Rationale

The captioned policy has been formulated in accordance with the Bank of Mauritius guidelines on Complaint Handling Procedures and Ombudsperson guidelines on Complaint Handling Policy & Procedures applicable to the Banks & non-Banks deposit taking institutions licensed by the bank of Mauritius.

In order to fulfil a regulatory requirement, board approved complaint handling policy need to be published on HBL website.

The policy document comprises of following sections:

- Resources and Staff Training
- Complaint Handling and Monitoring
- Investigation of Complaints
- Effectiveness
- Record Keeping
- Relationship of HBL with its Customers
- Notifications to the Ombudsperson

This policy has been concurred by Head of Compliance Mauritius, Country Manager Mauritius, Head International Compliance, Head International Banking, Head Global Operations, Chief Compliance Officer and the President & the CEO.

Recommendation

Based on the above, approval is solicited for the Complaint Handling Policy/Procedures for HBL Mauritius.

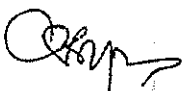
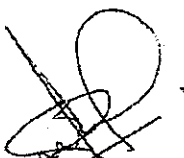

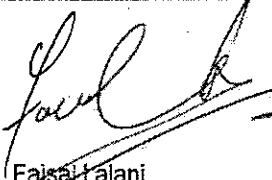
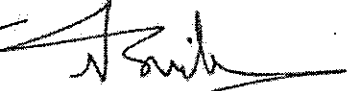
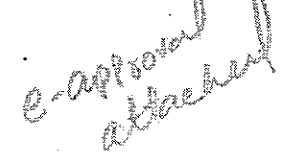
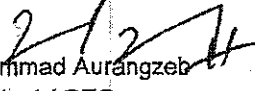
Shafaq Rahid
Head Service Quality

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★ Company Secretary ★



Complaints Handling Policy

Name of Document Owner: Complaint Coordinator

Name of Document: CC2 F280 Complaints Handling Policy			
APPROVAL SHEET			
Document Owner: HBL Mauritius			
Document Version: Version 1.0			
Implementation Responsibility: HBL Mauritius			
Custodian: Complaint Coordinator: HBL Mauritius			
Operating Jurisdiction: HBL Mauritius			
Last Approved: Not Applicable			
Review Frequency: After 3 Years or earlier if required			
Review Responsibility: Complaint Coordinator: HBL Mauritius			
Approval Date: 23 March 2021			
Effective Date: 23 March 2021			
Next Review Date: Three (03) years from approval date or earlier if required			
Prepared by		Reviewed by	
 Vanshinee Bhirugnath Complaints Coordinator – HBL Mauritius		 Pirbhay Zakirhussen Country Operations Manager – HBL Mauritius	
Concurred by		Concurred by	
 Ahsan Aziz Head International Compliance		 Faisal Lalani Head International Banking	
 Muhammad Nassir Salim Head Global Operations		 Waheed Rathore Chief Compliance Officer	
Recommended by		Approved by	
 Muhammad Aurangzeb President / CEO		Board of Directors	

HABIB BANK LIMITED
Approved in 231st
Meeting of the Board of Director
Held on April 20, 2021

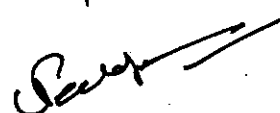

Company Secretary

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1.Introduction

Customer's complaint is an expression of dissatisfaction or grievance conveyed to the Bank orally or through any other channel that requires a response from the bank. The complaint may be related to the quality of services being provided by the bank or the behavior of the branch personnel.

Customer's complaint should not be viewed negatively as it is a source of customer feedback which provides an opportunity to the bank to identify how to improve performance and customer's related services.

1.1. Scope

This policy is applicable to HBL Mauritius (hereafter referred to as "HBL") and will be read and complied in conjunction with the Bank of Mauritius Guidelines on Complaint Handling procedures and the Ombudsperson Guidelines on Complaints Handling Policy and Procedures. As per Bank of Mauritius issued "GUIDELINES ON COMPLAINTS HANDLING POLICY AND PROCEDURES APPLICABLE TO BANKS AND NON-BANK DEPOSIT TAKING INSTITUTIONS LICENSED BY THE BANK OF MAURITIUS" dated October 07, 2019

The Ombudsperson may for the purposes of the Ombudsperson for Financial Services Act request any institution to furnish within such time and in such form and manner as he may determine such information as he may require. He may also by notice in writing to financial institutions falling under his purview, issue instructions and guidelines and impose such requirements as he may determine.

1.2. Target Audience

1.2.1Customers

This policy should be made available on HBL's website with a view to bringing actual notice thereof to their consumers. This policy may be made available to customers free of charge upon request.

1.2.2Staff

This policy is applicable to all HBL employees who are expected to act in accordance therewith. HBL will ensure that all relevant employees are aware of this policy either through e-mail or in hard copies.

1.3. Policy Owner

This policy is owned by the Complaint Coordinator of HBL Mauritius. Moreover, this policy will be reviewed every three years or earlier if required.

1.4. Board Approval

This policy and any of its subsequent amendments shall be approved by the Board of Directors.

1.5. Effective Date

This policy shall be effective upon its approval from the Board

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2. Resources and Staff Training

- HBL will appoint a complaints coordinator with the overall responsibility for the handling of complaints. The complaints coordinator, who will be an officer at senior managerial level, will be empowered to either resolve complaints or have access to, the person who has the authority to do so.
- HBL will ensure that appropriate training is provided to the staff to ensure an excellent customer service to all the clients.

3. Complaint Handling and Monitoring

- Consumers will be allowed to make complaints by any reasonable means, for example in person at the complaints counter, by phone, by letter, facsimile or e-mail.
- Special assistance will be given to customers having disability or language problems.
- Efforts will be deployed for complaints to be resolved on the spot. In the case that it has not been possible for the complaint to be resolved on the spot, consumers should then be advised to submit their complaints in writing at the counter or by letter through the post, facsimile or by email.
- HBL will, except where the complaint has been made verbally or over the phone, send a written acknowledgement of the complaint within two working days of its receipt, giving the name, job title and contact details of the person handling the complaint. A written reply containing the decision should be sent to customers within 10 days from the date of complaint.
- Complainants should be informed that in case they are still aggrieved by the decision provided to them by HBL, or that they have not received a reply from HBL within 10 days as from the date of their complaint, they may refer their complaint to the Office of the Ombudsperson to be dealt with in the manner the Office considers appropriate.

4. Investigation of Complaints

Once a complaint has been received by HBL, it shall: -

- investigate the complaint competently, promptly and impartially;
- assess fairly the subject matter of the complaint and see whether the complaint should be upheld and what remedial action or redress (or both) may be appropriate;
- offer any redress or remedial action which is appropriate;
- explain to the complainant, in a way that is fair, clear and not misleading, its assessment of the complaint, its decision on it, and any offer of remedial action or redress; and

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- comply promptly with any offer of remedial action or redress which the complainant accepts.

To avoid any conflict of interest, the complaint should be investigated by someone who has not been directly or indirectly involved in the complaint.

5. Effectiveness

- HBL will monitor its complaints to help identify whether its products and services are causing issues for consumers and whether its operations and processes are working as intended. Complaints can serve as helpful indicators of possible weaknesses in processes, training, and controls.
- HBL will put in place an efficient information management system capable to monitor and review the quality of complaint handling, detect underlying problems and take actions to address issues identified.
- There will be regular reporting to senior management for review as per section 10.3 of Guidelines on Complaints Handling Policy & Procedures Applicable to Banks & Non-Bank Deposit Taking Institutions Licensed by the Bank of Mauritius.
- A regular assurance exercise will be conducted by competent and independent staff. The assurance exercise should aim at examining whether the procedures are operating effectively.
- The results of the assurance exercise should be used to improve the complaint handling procedures, operating processes, products and services as appropriate.

6. Record Keeping

- HBL Mauritius will record and retain details of complaints for at least a period of 10 years as from the date of their receipt. In the event where complaints have been escalated to a court of justice, all the related evidences should be retained till the relevant court hearing is delivered.
- Bank will not close the account of a customer, without good cause shown.
- Phone calls made by consumers should be attended promptly by Bank. Consumers should not be made to wait for more than 2 minutes after his call has been made. In cases where the recipient of the call is not at his place of work or is busy, the consumer should be so informed and requested to call later. This provision shall not apply to a consumer phoning directly on the telephone number of any particular staff.
- If the events relating to the complaint made by a party have been recorded via the CCTV services operational at HBL Mauritius, HBL will make a copy of this CCTV recording on CD/external drive and keep same for a minimum of 10 years. Where complaints have been escalated to a court of justice, and the proceedings are more than ten years, the recordings should be retained till the relevant court hearing is delivered.

7. Relationship of HBL with its Customers

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- The relationship between HBL and a consumer shall be guided by three key principles namely: fairness; reliability; and transparency.
- HBL should not engage in unfair, deceptive practices or unbecoming behaviour such as intimidating, abusing, or humiliating a consumer. HBL should, through its préposés, always be courteous towards its customers. Responsibility thereof would be borne by HBL.

8. Notifications to the Ombudsperson

- HBL should provide the Office on a quarterly basis, with information on complaints as per format specified in the Guidelines on Complaints Handling Policy & Procedures Applicable to Banks & Non-Bank Deposit Taking Institutions Licensed by the Bank of Mauritius.
- HBL should notify the Office as soon as reasonably practicable of any subsequent change of the complaints coordinator.
- HBL should take such measures as are necessary and deploy every effort to reduce the time which consumers have to wait before being served at their premises. In this context, financial institutions should forward to this Office a report on a monthly basis showing the total amount of consumers visiting the financial institution on a daily basis and the maximum time that a consumer has had to wait at the financial institution before being served and the efforts that the financial institution have made to reduce waiting time.

This Complaints Handling Policy shall be binding on HBL.

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